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February 18, 2025

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Marconi,

**RE: Board File No. EB-2024-0111, EGI 2024 Cost of Service Application, Phase 2**

Please find enclosed the final submissions of the Ontario Greenhouse Vegetable Growers with respect to the above noted proceeding. We note that our submissions are focused on the following issues only:

*Should the OEB approve Enbridge Gas's proposed change to calculation of the Meter Reading Performance Measure (MRPM) metric to exclude inaccessible meters?*

*Should the 2024-2028 Incentive Ratemaking Mechanism (IRM) include a mechanism to decouple revenue from customer numbers?*

If any further information is required, please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro  
Encl.

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*,  
1998, S.O. 1998, c.15 (Schedule. B);

**AND IN THE MATTER OF** Phase 2 of an Application  
by Enbridge Gas Inc, pursuant to section 36(1) of the  
*Ontario Energy Board Act, 1998*, for an order or  
orders approving or fixing just and reasonable rates  
and other charges for the sale, distribution,  
transmission and storage of gas as of January 1,  
2024.

**Submissions of the Ontario Greenhouse Vegetable Growers**

**February 18, 2025**

## Introduction

1. These are the submissions of the Ontario Greenhouse Vegetable Growers (OGVG) with respect to the following unsettled issues:
  - a) Should the OEB approve Enbridge Gas's (EGI's) proposed change to calculation of the Meter Reading Performance Measure (MRPM) metric to exclude inaccessible meters?
  - b) Should the 2024-2028 Incentive Ratemaking Mechanism (IRM) include a mechanism to decouple revenue from customer numbers?

## METER READING PERFORMANCE MEASURE

2. OGVG's members have not expressed issues with respect to EGI's meter reading performance. Accordingly, we expect that intervenors representing ratepayers who have experienced serious meter reading issues may have more impactful submissions as to whether it is appropriate to allow a change to EGI's MRPM.
3. OGVG would note, however, that EGI has provided extensive evidence as to the nature of its meter reading performance, including the issues related to inaccessible meters and EGI's (successful) efforts to increase its meter reading performance including with respect to inaccessible meters.
4. Considering this extensive evidence of what OGVG would suggest represents EGI's reasonable efforts to deal with meter reading issues, OGVG submits that it may not ultimately matter whether the MRPM is changed to exclude inaccessible meters or not.
5. If the MRPM is not changed then EGI will, presumably, respond to any *prima facie* failure to meet the required performance metric by repeating and relying on its already extensive evidence as to the nature of the issue and its efforts to address it. If the MRPM is changed to exclude inaccessible meters OGVG expects that such exclusion would necessarily be made in conjunction with a direction from the OEB to EGI to, notwithstanding the exclusion, continue efforts to reduce the incidents of inaccessible meters and report on the progress towards that goal.
6. Accordingly OGVG is agnostic as to whether the MRPM is actually changed or not; in OGVG's view what is important is that EGI's efforts to manage inaccessible meters continue to be tracked and acknowledged, whether in response to an unchanged MRPM or as a requirement in exchange for a changed MRPM, such that in either case EGI remains motivated to continue its work to reduce inaccessible meter issues to the extent that is reasonable.

**REVENUE DECOUPLING PROPOSALS**

7. Having reviewed the submissions of both Environmental Defence (“ED”) and EGI on the issue of revenue decoupling, and having discussed the issue amongst a sub set of intervenors, OGVG respectfully submits that it makes most sense to consider revenue de-coupling as a possible feature in EGI’s ratemaking framework in the context of EGI’s next cost of service proceeding, wherein it can be considered alongside the host of other ratemaking framework elements that could be changed in concert to address, wholistically, the concerns raised by “energy transition” issues to the extent that the province’s and the OEB’s plan to address such issues have more fully crystallized at that time.
8. In OGVG’s submission while it may be tempting to make a temporary, pre-emptive change along the lines of one of the “options” suggested by ED in advance of a wholesale review of the regulatory framework that governs EGI’s rates, it would be premature and inappropriate to act on one such measure in isolation before considering potential consequences and whether it is necessary or appropriate in the context of other changes that may be implemented in the near future.
9. With those views in mind, OGVG does not intend to make further detailed submission that would mimic and overlap with the submissions of similarly minded intervenors. To that end OGVG has reviewed an early version of the detailed submissions that have been prepared by the School Energy Coalition (“SEC”) on this issue and can assert that OGVG generally agrees with SEC’s analysis and conclusion that the OEB should require Enbridge to consider the issue as part of a broader review of the company’s rate framework for its next rebasing application.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 18<sup>th</sup> DAY OF FEBRUARY, 2025**