

VIA E-MAIL & RESS

October 31, 2011

Ontario Energy Board
Attn: Kirsten Walli, Board Secretary
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

**RE: EB-2011-0242 - Enbridge Gas Distribution
EB-2011-0283 - Union Gas Limited
Renewable Natural Gas Program Application**

REQUEST & SUPPORT

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application dated October 21, 2011. The Application requests approval for the program and adjustments to rates under Section 36 of the Ontario Energy Board Act, 1998. If the program were approved and depending on what rate mechanism is chosen, the resulting rate adjustments would have effect on the members of the FRPO.

FRPO is Ontario's leading advocate for quality rental housing, representing over 800 private owners and managers who supply over 250,000 rental suites across the province. Our members strongly believe that the rental-housing sector is best served by a competitive marketplace that offers choice and affordability in the provision of energy services. As a not-for-profit organization, FRPO does not have other funding sources to ensure experienced representation to participate in and assist the Board in these regulatory proceedings. FRPO has previously assisted the Board in other matters and has been awarded costs by the Board. Therefore FRPO would respectfully request a determination of eligibility for cost award in this proceeding.

ISSUE

FRPO has reviewed the application and recognizes that there would be environmental benefits with the program and possibly economic benefits. However, we would desire a better understanding of those benefits and give consideration to who would bear the costs. At this time, it is difficult, absent additional discovery for us to recommend a written or oral hearing. We would, however, respectfully reserve our rights to ask interrogatories and cross-examine depending on the chosen proceeding. This program is somewhat novel to the existing natural gas

systems and would represent a long term commitment by ratepayers. Any resulting impacts ought to be considered in an equitable fashion in the public interest, however, our members would likely be impacted.

REPRESENTATION

If the intervention requested is granted, then FRPO asks that further communications with respect to this matter be sent to the following:

Mr. Dwayne R. Quinn
DR QUINN & ASSOCIATES LTD.
130 Muscovy Drive,
Elmira, Ontario
N3B 3B7

Phone: (519) 500-1022
Email: drquinn@rogers.com

Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. N. Ryckman - Enbridge Gas Distribution
- K. Hockin - Union Gas Limited
- V. Brescia - FRPO