

VIA E-MAIL

February 26, 2018

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

RE: EB-2017-0127/0128 – LDC DSM MID-TERM REVIEW – FRPO REQUEST

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) with respect to the mid-term review of the LDC DSM programs initiated by the Board in the summer of 2017. While FRPO was an active participant in the generic proceedings EB-2015-0029/0049, and in the individual LDC proceedings prior to the generic proceeding, competing priorities and extenuating circumstances resulted in our conscious decision to trust in our colleagues from other ratepayer groups to address the policy concerns on behalf of the ratepayers' perspective. In reviewing submissions by our colleagues, our confidence was well-placed.

As the proceeding moves to phase 2, we believe we have a contribution to make to the Board's process while advocating our members' perspectives directly. Our interests and contribution will be outlined below. As such, we respectfully request intervenor standing and a request for cost award eligibility. We recognize as a matter of protocol that we accept the record as it stands as our review of that record and evolutions in public policy are driving our request to intervene at this time.

FRPO is Ontario's leading advocate for quality rental housing, representing over 800 private owners and managers who supply over 350,000 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.

ISSUES

As has been articulated by many of the participants in phase one of this proceeding, the emphasis on addressing the climate change initiatives of the government creates a complex inter-play between the DSM initiatives of the LDC's and their carbon emission mitigation efforts under

their compliance requirements. This complexity is enhanced as the government's initiatives, such as GreenOn, attempt to address reductions in carbon emissions from energy sourced from natural gas fuel. Our members' desire is to support the policy initiatives driving these changes while striving to contribute to systems that would support coordination of programs and efficacy from investments made by ratepayers.

In addition, FRPO desires to contribute to advancing some of the longer term initiatives with respect to the infrastructure implications of DSM and climate change initiatives. FRPO has contributed to the record in assistance of the Board on technical and engineering issues and infrastructure initiatives in the past and would desire to do so in this proceeding. In our view, the public interest determinations ought to be considered within a different context than at the outset of the six year plans of the utilities.

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. A. Mandyam – EGD, A. Stiers – Union
EGDRegulatoryProceedings, UnionRegulatoryProceedings
V. Bennett – OEB Staff