

VIA E-MAIL (RESS)

January 18, 2011

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

Dear Ms. Walli:

RE: EB-2010-0300 Union Gas Limited and EB-2010-0333 Enbridge Gas Distribution

Pre-approval of Cost Consequences of Long-Term Natural Gas Contracts

FRPO Letter of Support for Written Argument

The Federation of Rental-housing Providers of Ontario (FRPO) is providing the following submission to the Board in support of the Letter of Comment of the Industrial Gas Users Association on the timing of response argument for intervenors in the combined proceeding noted above. For the purposes of efficiency, we will not repeat IGUA's submissions relative to timing but will support their rationale and provide our additional concerns.

Over the past few years, the Board demonstrated considerable foresight in the development of the Filing Guidelines for the Pre-Approval of Long-Term Gas Supply and/or Upstream Transportation (EB-2008-0280) and, more recently, the 2010 Natural Gas Market Review. These two initiatives were developed using industry expert evidence and extensive consultations to provide the Board with publicly interested ideas and considerations for the benefit of the market participants and ratepayers in the province. In our view, the current proceeding for Pre-approval of the Cost Consequences is founded on the Filing Requirements and its complexity is a direct result of the North American market changes that precipitated the 2010 Market Review. Given that the Approvals being sought are ten year contracts that start to flow at the end of 2012, we submit that there is an opportunity to consider the need for an expedited approach. Further, since the utilities are seeking complete ratepayer funding, we would respectfully submit that ratepayers be afforded some time to review the additional evidence from the oral examination prior to preparing submissions in the relatively new framework.

In addition to the above concerns regarding the timing, our concern was heightened regarding the need to meet the initial deadlines articulated by the utilities by the most recent amendments to the Applications. Each utility has provided Amended Precedent Agreements with TCPL dated December 9, 2010 that provide for an Event Cancellation by the TCPL Board of Directors that could visit costs on ratepayers, directly or indirectly. In our respectful submission, the timing of this update alone presents reason to consider the requirement for oral argument in the hearing to meet expedited time frames.

Therefore, we would also encourage the Board to consider the merits of a written argument in whatever timeframe the Board sees fit given the balance between efficiency and effectiveness in a complex situation.

We have chosen this method of submission as our representative in these matters, Dwayne Quinn of DR QUINN & ASSOCIATES LTD., will also not be able to be in attendance personally due prior obligations committed to before the hearing was scheduled. However, he is the process of working with Board staff to determine alternative methods of monitoring the hearing and presenting our position whatever the Board decides on the argument schedule.

Please place copies of this letter before the Hearing Panel in advance of Thursday's scheduled hearing.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. Applicants, Interested Parties - EB-2010-0300/EB-2010-0333
V. Brescia (FRPO)