

VIA E-MAIL (RESS and Courier to the Board)

April 11, 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-2011-0052

**Preliminary Assessment of Incentive Regulation Plans of the Natural Gas Utilities
Cost Eligibility Request for the Federation of Rental-housing Providers of Ontario (FRPO)**

REQUEST & SUPPORT

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Board-initiated consultations articulated in its letter of February 25, 2011.

FRPO is requesting the opportunity to participate as it has been actively involved in rate matters for both utilities over the last few years. The Incentive regulation are foundational to the balance between the interests of the utilities and its customers. These are substantive issues for our membership and we offer the following in support of our request.

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 with these regulatory proceedings and submits that it is eligible under Section 3.03 (a) in representing the interests of its rate-paying members. FRPO has previously assisted the Board in other matters and has been awarded costs by the Board.

REPRESENTATION

The Board requested that those organizations applying for eligibility identify the name and credentials of the representative that the organization intends to retain. FRPO advises that Mr. Dwayne Quinn of DR QUINN & ASSOCIATES LTD would be retained to represent its interests. Mr. Quinn has over twenty years of experience in the natural gas industry. He is well known to the Board in a previous capacity in leading a combined natural gas and water utility and most recently in representing our members' interests at the Board in natural gas. Further, in his previous role with the utility, Mr. Quinn was instrumental in working with the Ministry of Public Infrastructure Renewal, the Ministry of Environment and the

Ministry of Municipal Affairs in developing a balanced approach to water and wastewater investment and ratemaking. Please find his resume attached.

For the reasons stated above, FRPO would respectfully request being added to the list of eligible organizations consulted and a determination of costs at the appropriate time as deemed by the Board.

If the requested 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 3P7
Phone: (519) 500-1022
Email: drquinn@rogers.com

Timing of Request

On behalf of FRPO, DR QUINN & ASSOCIATES would offer an apology to the Board and the natural gas utilities for the timing of this request. FRPO was not involved in the previous proceedings on Incentive Regulation and, as such were not sent the letter with other interested parties on February 25, 2011. In fact, we were only made aware of the proceeding this afternoon in consultation with another intervenor who noted our absence on the decision on Cost Eligibility issued April 8th. We apologize for any inconvenience our timing has caused the Board or other parties but would respectfully submit that no party would be prejudiced by our participation in this proceeding as scheduling has not been determined..

Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. L. Klein (OEB)
- N. Ryckman (EGD)
- M. Kitchen (UG)
- V. Brescia (FRPO)