

VIA E-MAIL & RESS

October 24, 2011

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

RE: EB-2011-0327 UNION GAS APPLICATION FOR 2012-2014 DSM PLAN

REQUEST & SUPPORT

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application . The Application requests approval of the DSM plan for 2012 to 2014 under Section 36 (1) of the Ontario Energy Board Act, 1998. The plan and associated rate impacts 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

The Ontario natural gas distributors have delivered DSM programs in their respective franchises for approximately 15 years and the results of those programs are a matter of record at the Board. In 2011, the Board undertook a generic review the delivery of these programs through a staff discussion paper and ensuing consultation. The resulting guidelines directed the utilities to make fundamental changes to their historic approaches to their respective programs.

FRPO participated in the consultation and commended the Board on its approach. Among our chief concerns submitted was the cross-subsidization that resulted from the exclusion of privately-owned apartment buildings from Low Income programs through the application of eligibility criteria derived from electricity. FRPO has increased its participation in DSM and has

recently been added to the utilities respective consultatives. We recognize the work that has gone into the plans of the utilities to this point and the importance of ensuring that the efficacy of DSM programs are maintained and increased during this time of change.

Therefore, FRPO would respectfully reserve its right to be involved in all aspects of the review of Union's proposed plan with special emphasis on the those aspects that impact multi-family buildings and Low Income. We are concerned that we have not seen evidence that Union has committed to investing in overcoming market barriers to overcome the distributional inequity for Low Income incentives to privately-owned buildings during the term of this plan.

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. M. Redford - Union Gas
V. Brescia - FRPO