

VIA E-MAIL, RESS & COURIER TO THE BOARD

December 14, 2011

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Attn: Kirsten Walli, Board Secretary

**RE: EB-2011-0242, EB-2011-0283 Renewable Natural Gas Program -
Draft Issues List Comments of FRPO**

In accordance with the Procedural Order No.1 dated December 5, 2011, the Federation of Rental-housing Providers of Ontario (FRPO) provides the following comments to the Draft Issues List appendix to the Order.

The applications provide an effective overview of the potential opportunities of Renewable Natural Gas and the Draft Issues List covers the regulatory issues well. We see merit in the view of some that threshold issues of jurisdiction and the role of the utility are paramount. We respect the foresight of the Board in planning a Procedural Conference to facilitate the development of an effective process to hear the applications. In addition, we support specifically the comments submitted by the Vulnerable Energy Consumers Coalition (VECC) in their proposed broadening of the issues list to encompass the alternatives to the utilities' proposed recovery of the costs of the program.

Thank you for the opportunity to comment on the Draft Issues List changes and we remain available to assist the Board and the utilities in the interest of those we serve.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. Union Regulatory Proceedings, EGD Regulatory Proceedings, Interested Parties, V. Brescia