

VIA E-MAIL, COURIER & RESS

December 21, 2011

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

RE: EB-2011-0210 UNION GAS APPLICATION FOR 2013 DISTRIBUTION RATES

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 Distribution Rates for 2013 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 300,000 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

Union Gas has just been through a five-year incentive regulation period which provided for stable rates and significant earnings for the utility. This proceeding will allow the Board and ratepayers to understand the opportunities for sustainable savings in 2013 and create rates that would become the foundation for future periods. The process should also be informed by the continued understanding of how Union's integrated system and market dynamics contribute to distribution rates.

FRPO participated in recent annual ratemaking and deferral account disposition proceedings and has gained understanding of the elements that would contribute to ratemaking in the public interest. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of the utility. Therefore, FRPO would respectfully reserve its right to be involved in all aspects of the review of Union's rate application.

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. C. Ripley - Union Gas
C. Smith - Union Gas Counsel
V. Brescia - FRPO