

VIA E-MAIL & COURIER TO THE BOARD

March 15, 2012

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

Attn: Kirsten Walli, Board Secretary

**RE: EB-2011-0210 UNION GAS REBASING - FRPO ISSUE LIST SUBMISSIONS**

The following are the submissions of the Federation of Rental-housing Providers of Ontario (FRPO) concerning the draft issues list in the above proceeding.

Recognizing much has been learned in recent deferral account and facility proceedings, we would want to ensure that the discovery process is not unduly constrained by a narrowing of the issues before the implications of accounting or methodology changes are fully understood. Therefore we strongly endorse the well stated conclusion of the School Energy Coalition (SEC) on these matters dated March 14, 2012. Further, in that regard, we believe that the generic Cost Allocation issue submitted by SEC ought to be mirrored on the Rate Making side. We would propose:

***Are Union's rate design proposals, including methodologies and judgements used and the application of those proposals with respect to Test Year rates, appropriate?***

We support the revision to the wording proposed by SEC under the General category as being more objective and appropriate to the determinations needed in this proceeding. While the following issue may find a home in the resulting final issues list, as it has components in several issue categories, we would want to ensure that it is not precluded by lack of specific reference:

***For facility investments made by Union to support ex-franchise services, is their inclusion in rate base and the proposed cost allocation and ratemaking appropriate?***

We note that the draft issues list mentions some ex-franchise services in cost allocations and some in ratemaking but we would want to ensure that all facility investments are reviewed for cost causality and recovery.

Lastly, we would support the additional issues submitted by SEC, London Property Management and Board Staff. To the extent that some parties would see overlap, we would welcome improved wording to allow better categorization of issues but not preclusion of the testing of complex issues.

Respectfully Submitted on Behalf of FRPO,



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Principal  
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c. Interested Parties EB-2011-0210  
V. Brescia