

VIA E-MAIL, COURIER & RESS

August 2, 2013

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

**RE: EB-2012-0459 ENBRIDGE 2014-2018 RATE APPLICATION**

**REQUEST & SUPPORT**

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application from Enbridge in the above proceeding. The Application requests approval of rates for five year period commencing January 1, 2014 under Sections 36 of the Ontario Energy Board Act, 1998. The 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 awards in this proceeding.

**ISSUE**

The Board determined 2013 Cost of Service rates for Enbridge in EB-2011-0354 proceeding. In our view, it was expected that the company would advance an Incentive Ratemaking Proposal and Evidence similar to the approach from 2008-2012 updated for the impacts of capital such as GTA reinforcement and priority infrastructure investment related to system integrity. The application is different in nature than what was expected.

We understand the Applicant has the right to propose a ratemaking framework. However, we do share the concerns expressed by the School Energy Coalition in its letter of July 20<sup>th</sup>. In our respectful submission, the proceeding could be encumbered and inefficient if a preliminary determination by the Board of the acceptability of Enbridge's proposed ratemaking approach is

not made. We would encourage the Board to consider the merits of a preliminary issue formulated to address the appropriateness of the proposed ratemaking framework.

FRPO represents the interests of its members who are impacted by changes to the regulated rates of Enbridge. Therefore, FRPO would respectfully reserve its right to be involved in all aspects of the proceeding.

**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  
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Phone: (519) 500-1022  
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Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. EGD Regulatory Proceedings  
V. Brescia - FRPO