

VIA E-MAIL, RESS & DELIVERED TO THE BOARD

March 17, 2014

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-2014-0039 ENBRIDGE APRIL 1, 2014 QRAM**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario ("FRPO") in response to the Board's Procedural Order No.1 in the above proceeding.

The QRAM process has been described by the Board and the Applicant as a mechanistic process to establish market sensitive rates on a quarterly basis. Variances from forecast are rolled through on a cycle and there is usually very little need for discovery.

Having reviewed the application in this proceeding, we are very concerned with the level of variances that the company has applied to pass on to customers without significant supporting evidence. We understand that it has been one of the coldest winters in the last quarter century and gas prices have spiked as a result of market dynamics. At the same time, the volume variances by month cause some concern relative to the prudence of the timing of load balancing purchases. We respect the Board's desire to allow prompt implementation of price changes. However, we respectfully recommend the Board consider whether there is sufficient evidence on the record to establish final rates.

Having viewed questions submitted by the Canadian Manufacturers & Exporters on March 14th, we strongly support their submissions as a starting point for inquiry. Balancing the desire to implement revised rates more closely aligned to the market, we would encourage the Board to consider approving the proposed rates on an interim basis pending further discovery as ordered by the Board.

Respectfully submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. EGD Regulatory Proceedings, A. Mandyam – EGD  
Interested Parties – EB-2014-0039  
M. Chopwick - FRPO