

VIA E-MAIL, RESS & DELIVERED TO THE BOARD

March 25, 2014

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

Re: EB-2014-0039 ENBRIDGE GAS APRIL 1, 2014 QRAM

We have reviewed Enbridge's response of March 25th and believe it necessitates a response in the public interest. In our view, Enbridge has selectively extracted the most favourable submissions of ratepayer interests and crafted an argument that suggests that there is no need for further scrutiny.

So that FRPO does not presume to speak on behalf of other intervenors, we will constrain our comments to assertions made by Enbridge in regard to FRPO submissions. From the outset, FRPO has respectfully requested enhanced opportunity for discovery. Specifically, we have avoided the stigma of prudence as we had insufficient evidence to call that into question. Now, however, Enbridge has implied that because we did not ask for a prudence review, that should not be something considered. In essence, they are submitting that they have yet to submit evidence that a prudence review is required and so, if intervenors want to request a prudence review, where is their evidence to substantiate that claim.

To be clear, FRPO respectfully requests that the Board approves the rates on an interim basis pending a full prudence review of the gas costs. To our point above, Enbridge submitted their letter of today that spoke to decisions made in one week in January that claim to establish diligence. However, FRPO's submissions spoke to a systemic variance from the Gas Supply plan in December and January. Enbridge was silent on their inaction in the month of December when substantial variances formed. Enbridge's selective response and inability to provide full assurance, in our view, is grounds for enhanced discovery before rendering a final decision on deferral dispositions in this proceeding.

If the Board were to consider the establishment of interim disposition of deferral accounts, in our respectful submission, the Board could clear the accounts on an interim basis and order an enhanced discovery phase in Enbridge's imminent deferral account disposition proceeding allowing a full discovery of aspects of seasonal and annualized gas supply costs in a timely fashion.

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