

VIA E-MAIL, COURIER & RESS

May 31, 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-2014-0145 UNION GAS DEFERRAL ACCOUNT DISPOSITION**

**REQUEST & SUPPORT**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario ("FRPO") in regard to the notice of application from the Ontario Energy Board published May 27, 2014. The Notice outlines Union's request for approval of the disposition of deferral account balances at year end 2013.

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.

**ISSUES OF CONCERN**

As 2013 was a rebasing year, much of the evidence in the application focuses on Gas Supply, Transport and Storage. These facets have come under considerable scrutiny in the last few years. With the continued changes in the North American supply market, we believe that it is important to ensure an equitable allocation of costs and benefits from the respective accounts as directed by past Board decisions in these areas.

FRPO's members purchase their natural gas through both direct purchase and system supply. Our concern would be that the account balances are allocated and disposed of consistent with past Board decisions. Further, we would seek to assist the Board and our members in understanding the implications of the Gas Supply Memorandum included in the evidence.

**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](mailto: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. K. Hockin - Union Gas