

VIA E-MAIL & COURIER

September 18, 2014

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

RE: EB-2014-0191 ENBRIDGE GAS DISTRIBUTION - QRAM October 1,2014

I am writing on behalf of the Federation of Rental-housing Providers of Ontario ("FRPO") in above matter . Given the tight frames associated the QRAM process and cognizant of the communication from the April 1st QRAM process for Enbridge, we offer the following for the Board's timely consideration.

In Enbridge's March 25th response to intervenor concerns, Enbridge diminished the value of comparison between itself and Union based upon differences in the respective gas supply plans. In its letter of September 17th, the Canadian Manufacturers & Exporters requested a comparison of the utilities' applied for commodity rates and PGVA recoveries. Unlike Enbridge, we view these outcomes of the gas supply plans as informative in determining whether further investigation into the prudence of actions and the appropriateness of applied for rates is warranted. The following table summarizes the applications:

		ENBRIDGE			UNION		
	APPLICATION	COMMODITY	PGVA	NB	APPLICATION	COMMODITY	PGVA
Apr-01	EB-2014-0039	23.07	7.16	(1)	EB-2014-0050	17.2	3.55
Oct-01	EB-2014-0191	17.6	5.54	(2)	EB-2014-0208	15.1	3.91

NB

(1)	Prior to Enbridge mitigation
(2)	Including Enbridge mitigation minimizing actual impact

In our view, in spite of distinctions drawn by Enbridge in the aforementioned response, the magnitude of the differences is without adequate explanation. Recognizing the time constraints and to allow better understanding, we would respectfully request the Board consider requiring full and complete response to our and other parties' inquiries in these matters in the Deferral disposition proceeding. In this way, October 1st rates could be implemented without prejudice to the findings within the Deferral Account proceeding.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
 Principal
 DR QUINN & ASSOCIATES LTD.

c. A. Mandyam - EGD, EGD Regulatory Proceedings, Parties to EB-2012-0459