

VIA E-MAIL & COURIER TO THE BOARD

September 24, 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 QRAM Application – FRPO Submission

Further to our submissions of last week and in response to the Enbridge letter of September 22nd, we respect that, once again, the QRAM process may not be the best proceeding for discovery and determination of our concerns. In response to the Enbridge letter of the 22nd, we understand that the proposed increase may not meet the threshold for greater discovery determined by the Board in August when viewed in isolation. However, viewed with the increases already in place from the winter, the threshold is easily achieved for cumulative rate impacts from the quarterly period prior to April 1st. We have tried to expedite a review of the circumstances to reduce further ratepayer risk for this winter by encouraging a review of concerns in the Deferral Account proceeding that is underway but respect that efficiency may not be effectiveness.

While Enbridge provided some answers as to what happened starting at the end of February, they have refused to disclose this level of detail for the earlier part of the winter which we requested. Enbridge's evidence speaks to the importance of maintaining store levels. But in our view, by February, they had already dug the hole and there was no good way to get out. As gleaned from Exhibit K8.2 in EB-2012-0459, Enbridge's actual storage level was 14.4 PJ less than their end of December target. While we understand that Enbridge has communicated that priority was given to filling potential UDC. However, from that same K8.2 Exhibit, Enbridge had only 8.5PJ in January. We have no clear answer as to what the plan was for fill in January (let alone December) from weekly meetings to assess market conditions and storage plan.

Respecting the Board's determinations, if the Board is satisfied with the evidence for the winter period, the rate impacts can be implemented on a timely basis and we will withdraw our request for discovery in the Deferral Account proceeding. We would respectfully request the Board consider the importance of this information for the Natural Gas Market Review EB-2014-0289 proceeding.

Respectfully submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. A. Mandyam – Enbridge D. Kim – Board Staff Interested Parties – EB-2014-0191