

VIA E-MAIL & COURIER

October 20, 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-2014-0271 - UNION GAS 2015 RATES APPLICATION**

**REQUEST & SUPPORT**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application . The Application by Union Gas, pursuant to section 36 of the Ontario Energy Board Act, 1998, requests an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas effective January 1, 2015. The resulting rates impact members of the FRPO.

FRPO is Ontario's leading advocate for quality rental housing, representing over 800 private owners and managers who supply over 350,000 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**

FRPO has participated in recent Union applications and desires to assist the Board in reviewing the application in light of the rate impacts that would be generated by this Application . FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Union Gas. Therefore, FRPO would respectfully requests to be involved in all aspects of the review of this Application. Specifically, FRPO is concerned with:

- The application of the IRM formula to generate 2015 rates
- Normalized Annual Consumption adjustments
- Union's response to 2014 Directives from the Board and Settlement Agreement provisions
- Y factor adjustments

**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. C. Ripley - Union Gas  
M. Chopowick - FRPO