

VIA E-MAIL & COURIER

December 19, 2014

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

RE: EB-2014-0276 ENBRIDGE GAS DISTRIBUTION - 2015 Rates

REQUEST & SUPPORT

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application in the above proceeding. In its Application, Enbridge is seeking adjustments to rates under section 36 of the OEB Act. These rate adjustments have impact on our members.

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 & INVOLVEMENT

This is the first year of the Incentive period whereby Enbridge will be setting rates under the novel custom Incentive Ratemaking Framework approved in EB-2012-0459. That proceeding was exceedingly complex and we want to ensure a faithful execution of the resulting Boards orders and directives. As such, we would expect to be involved in all aspects of the proceeding.

Further, the end of 2015 will see the first steps into a transition of moving from predominately long-haul transport from Alberta to short-haul transport from neighbouring supply sources. This shift in transport will impact transport and load balancing costs for customers. The Enbridge QRAM application EB-2014-0348 provided little information on how this shift and the resulting PGVA impacts would be handled from a cost allocation and ratemaking perspective. We believe that this 2015 rates proceeding would provide a better forum for discovery and comprehension of the principles to be used in managing these impacts and we would encourage the Board to provide the necessary discovery even if some of the dispositions will be managed in the QRAM process.

DR QUINN & ASSOCIATES LTD.

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

Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Mandyam, K. Culbert - EGD
EGD Regulatory Proceedings
S. Andison - FRPO
M. Chopowick - FRPO