

VIA E-MAIL

September 3, 2015

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

RE: EB-2014-0182 Union Gas Burlington Oakville Project – Request for Oral Hearing

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”). We are writing in support of the letter submitted by the School Energy Coalition (“SEC”) on September 2, 2015. The SEC letter outlines the substantial differences between the positions of the applicant and the independent expert in evidence to this point. We support the concerns expressed by SEC.

Further, we are concerned that the Reply Evidence filed by Union relies on a mis-characterization of the Cheung evidence. The Cheung evidence proposes meeting the incremental needs for Burlington-Oakville at Niagara instead of Dawn¹. Union has re-framed the evidence to assert that the Alternate Proposal requires the purchase of the entire 20 year growth projections of 276TJ/day at Niagara². FRPO sought to clarify this significant difference through interrogatories to the Reply Evidence³. The response in part c) of FRPO.3 provides the incremental capacity required as 88TJ/day yet, in answer to part b), Union answers:

“This would indicate that the Alternative Proposal not only contemplates contracting for the incremental amount needed at the outset to meet peak day needs but the amount needed to meet all peak day needs at the outset.”

This statement tests the bounds of reasonableness. Why would anyone recommend meeting the entire peak day needs of a distribution system including 20 years of growth with 15 year transportation contracts?

We support SEC’s request for an oral hearing to test the evidence and ensure a clear record for the Board.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. V. Innis, Union Regulatory Proceedings
Parties to EB-2014-0182
S. Andison – FRPO

¹ CME_OGVG_IntrvEVD_Aggie Cheung_Union Gas_20150629, page 4, para. 15.

² Union_ReplyEVD_Burlington Oakville_20150731, page 16.

³ Exhibit D. FRPO.3