

VIA E-MAIL

September 12, 2015

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-2015-0179 - UNION GAS EXPANSION OF NATURAL GAS DISTRIBUTION**

**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 changes to rates and Ontario Energy Board policy EBO188 for the expansion of the natural gas distribution systems to un-serviced areas using an evolved economic approach and threshold. The resulting rate changes 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 Gas applications and desires to assist the Board in reviewing the application in light of the rate impacts that would be generated by this Application. These proposed changes would result in a very significant change to Board policy in the area of expansion and would have impact on the distribution rates of other customers. 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.

**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  
S. Andison, M. Chopowick - FRPO