VIA E-MAIL

September 21, 2016

Ontario Energy Board

Attn: Kirsten Walli, Board Secretary

P.O. Box 2319

27th Floor, 2300 Yonge Street

Toronto ON M4P 1E4

**RE: EB-2016-0186 Union Gas Panhandle Reinforcement Project**

**FRPO Request for Technical Conference**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in regard to the current discovery process in the Panhandle Reinforcement Project. We have reviewed the Applicant’s Interrogatory Responses submitted September 19th and would respectfully submit that a Technical Conference would contribute to an efficient and effective proceeding in the determination of the application and assist in our consideration of the value of evidence to the Board.

As outlined in the cover letter to our interrogatories of August 26th, to understand fully the complexity of the natural gas flows, it is crucial to understand the conditions, constraints and assumptions that form the basis for the analysis. A technical conference would provide an opportunity to determine the difference between physical, commercial and market constraints to allow for a consideration of the range of feasible alternatives considered and the impact of those alternatives on ratepayers.

As one example, there are many flows and capacities stated in different interrogatories that, on the surface, don’t seem to reconcile. In seeking to understand the constraints on the ability for enhanced flow at Ojibway to defer or reduce the scope of the project, several different constraints are stated in different ways throughout the interrogatory responses. For example, in IR response FRPO.6, Union states that the Presidential Permit limits the maximum receipt by Union at Ojibway to 210 TJ/day. However, in that same response, Union states that the maximum Ojibway to Dawn capacity that Union will guarantee is 140TJ/day in the winter of which 58TJ/day in Union Gas supply with more capacity sold when the Windsor market need is greater. At the same time, in IR response FRPO.20, the actual gas receipts at Ojibway exceed 210TJ/day for dozens of days topping out at over 440TJ/day in January of 2014. Understanding the operational, technical and physical constraints and Union’s ability to overcome these barriers is essential to a determination that the proposed solution is the most effective or if another solution can be proposed.

In our view, a Technical Conference that allows for a dialogue contributing to a refined understanding is more effective than supplemental interrogatories for a consideration of the benefit of intervenor evidence to the Board. Further, we would respectfully submit that this type of dialogue would likely be best heard in a technical conference as opposed to an oral hearing even if intervenor evidence is not produced. This is especially the case if the hearing going to be held at a location closer to the communities served by the Panhandle system. Given the applicant’s request for a determination of these issues and approval of the project by mid-March 2017 as provided in its cover to the Interrogatory responses, we would respectfully submit that including a Technical Conference is the most efficient and effective means of determining the issues in this proceeding.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn

Principal

DR QUINN & ASSOCIATES LTD.

 c. K. Hockin – Union Gas, S. Andison, K. Lauesen – FRPO, A.S. Cheung

 Interested Parties EB-2016-0186