

VIA E-MAIL

October 22, 2016

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-2016-0215 - EGD 2017 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 in the referenced proceeding. The Application by Enbridge Gas Distribution under section 36 of the *Ontario Energy Board Act, 1998*, as amended (the "Act"), requests an Order or Orders approving or fixing just and reasonable rates for the sale, distribution, transmission, and storage of gas commencing January 1, 2017. 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**

In the above subject application, Enbridge presents evidence in support of its requested 2017 rates under the incentive regulation mechanism approved in EB-2012-0459. Enbridge provides evidence for adjustments to their gas supply management including the introduction of synthetic storage into its portfolio. In addition, the evidence notes Enbridge's awareness and intent to investigate the impact of consistently higher heat value. Having brought the heat value issue to Enbridge's attention and recognizing that there may also be a cross-subsidization issue with this increased and fluctuating value, FRPO intends to pursue greater discovery for the purposes of examining this effect. Given that the notice of application provided a list of issues for which the Board would consider cost award, we are concerned that the Board's lack of awareness of emerging issues could preclude intervenor funding in pursuit of assisting the Board in the understanding and determination of issues in the public interest. As such, FRPO requests that it be determined eligible for recovery of its reasonably incurred costs herein is not confined only to the issues listed in the Notice, and is made without prejudice to positions which FRPO may advocate in this proceeding regarding the appropriate scope of cost awards to eligible intervenors.

## **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. A. Mandyam, K. Culbert, EGD Regulatory Proceedings – Enbridge Gas Distribution  
C. Schuch – OEB Staff  
S. Andison, M. Chopowick - FRPO