

VIA E-MAIL & COURIER

May 12, 2017

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

RE: EB-2017-0091 - UNION GAS 2016 Deferral Account Disposition

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application received from Union Gas on May 9th. The Application by Union Gas is seeking order or orders clearing certain non-commodity related deferral accounts and sharing utility earnings pursuant to a Board-approved earnings sharing mechanism. The resulting rates impact the 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 applications and desires to assist the Board in reviewing the application in light of the rate impacts that would be generated by this Application. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Union Gas. Therefore, FRPO respectfully requests involvement in all aspects of the review of this Application.

Given that the notice of application provided a list of issues for which the Board would consider for 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's request 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.

As a specific example, Gas Supply issues were omitted from the list of issues considered for cost award in Union Gas' 2017 rates proceeding (EB-2016-0245). We respect that the Board has undertaken a process to develop a framework to review the Gas Supply plans of the utilities (EB-2017-0129). However, given the timeframe projected for the Staff report, more than a year of Gas Supply planning would go untested prior to the Board's opportunity to implement a new framework, if that is the outcome of the framework proceeding. While there is no specific approval requested by Union, their provision of Incremental Transportation Contracting Analysis was the agreed upon documentation that Union would provide in its Deferral Account disposition proceeding to allow insight into Gas Supply contracting decisions for more than a decade. Absent other means of testing the decisions that Union is making on behalf of its ratepayers at this time, we respectfully request that the Board consider inquiry into Gas Supply matters for cost awards in this proceeding.

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 Muscovey 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. K. Hockin - Union Gas
- K. Lauesen - FRPO