

VIA E-MAIL & COURIER

October 21, 2017

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-2017-0087 - UNION GAS 2018 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. The Application by Union Gas, pursuant to section 36 of the Ontario Energy Board Act, 1998, requests an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas effective January 1, 2018. 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. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Union Gas. 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.

**INVOLVMENT AND INTENTION TO SEEK COST AWARD**

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. Therefore, FRPO would respectfully request involvement in all aspects of the review of this Application. 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.

In reviewing the Notice of Application, we noted the limitation on consideration of cost awards to updates to the Rate M12 Schedule "C" and the Panhandle Reinforcement Project. From our involvement in Union Gas rate cases and their respective settlement conferences during the IRM period, we understand that there is risk to our members with other issues outside of the mechanistic increase formula and the two issues above. As a result, we would respectfully

reserve our position to seek cost awards on issues which upon full discovery inform the Board in the need for determination.

**WRITTEN VS. ORAL HEARING**

In response to this issue contained in the Notice, while we do not have the benefit of the results of discovery, in our experience, we believe that it would be valuable to plan for an oral hearing to ensure timely hearing of any unsettled issues. However, even if there is a full settlement of all issues, we believe that the Board and the process benefit from a presentation of the settlement to ensure clarity and to include any amendments to the agreement the Board Panel may seek.

**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 our request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. A. Stiers - Union Gas  
P. Fogolin - FRPO