

VIA E-MAIL

March 5, 2018

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

**RE: EB-2017-0391 Enbridge Gas Distribution – RNG Enabling & Geothermal Programs
FRPO Intervention Request**

REQUEST & SUPPORT

I am writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application in the above proceeding. In its Application, Enbridge is seeking an Order or Orders under Section 36 of the Act to commence operations of the new Programs. The rate impacts from these Orders would have impact on our members.

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 & INVOLVEMENT

We understand that Enbridge views these programs as instrumental in assisting consumers transition to a less carbon intensive economy. However, FRPO is concerned with the priority being placed on these infrastructure intensive programs with other more effective abatement initiatives being deferred. While RNG is purported to be emissions free from a statutory perspective, we respectfully recommend that the Board ought to consider the long-term nature of the investments being proposed and the rate impact on end-use customers with limited actual impact on the carbon emissions that are being targeted. As was evidenced in the EB-2017-0224, the cost of this stream of natural gas is very expensive and reliant on substantial provincial funding to be comparable to traditional sources.

In response to the Board's notice requesting input on the manner of hearing, given the technical nature of these programs, interrogatories followed by a technical conference would allow a comprehensive understanding of the issues allowing the Board and parties to consider the most effective manner of hearing. We respectfully request the opportunity to be involved in each step of the proceeding.

DR QUINN & ASSOCIATES LTD.

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. A. Mandyam, EGD Regulatory Proceedings - EGD
V. Bennett – Board Staff
L. Cooper – FRPO
Interested Parties EB-2017-0319