

VIA E-MAIL

March 6, 2018

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

RE: EB-2017-0306/0307 – EGD and UGL – Merger Application – FRPO Submission

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) with regard to the Board’s Procedural Order No. 3 issued March 1, 2018 in support of the letter filed by the Consumers Council of Canada (“Council”) March 5, 2018.

FRPO’s review of the Procedural Order resulted in the same concern expressed by the Council. While it is difficult to be exhaustive or definitive, our preparation of interrogatories, filed yesterday, served to identify some issues whose resolution may result in a need to adjust base rates to ensure a balance of interests for consumers and the merged utility. However, we will not be in a position to demonstrate that need without the completion of an effective discovery process. We add our voice to that of the Council in respectfully urging the Board to reconsider its decision on adjustments to base rates to ensure fairness to consumers who may propose an adjustment in the public interest.

Thank you for your consideration of our request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. Andrew Mandyam, EGD, M. Kitchen - Union Gas,
EGDRegulatoryProceedings, UnionRegulatoryProceedings
K. Viraney – Board Staff