

VIA E-MAIL

August 6, 2018

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-2018-0131 Enbridge Gas Distribution - 2017 ESM & Deferral Account Disposition  
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 approving the clearance or disposition of amounts recorded in certain Deferral or Variance Accounts under section 36 of the OEB Act. The rate impacts from these dispositions will 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**

This is the fourth year of the Earnings Sharing and Deferral Dispositions under the new Incentive period whereby Enbridge has been setting rates under the novel custom Incentive Ratemaking Framework approved in EB-2012-0459. That proceeding was exceedingly complex and we want to ensure the resulting determination, allocation and disposition of the Deferral and Variance accounts are appropriate under the Board's orders and directives. In particular, Enbridge is seeking disposition of significant Commodity Related Accounts (specifically Storage and Transportation). FRPO has assisted in providing insight to the Board and advancing ratepayers' interests in these areas in the past. As such, we would expect to be involved in all aspects of the proceeding.

In response to the Board's notice requesting input on the manner of hearing, given our experience with matters arising from recent Deferral Account proceedings, we believe that an oral hearing preceded by interrogatories and a settlement conference would be an effective process to determine these issues.

# 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](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 - EGD  
D. Chong - FRPO