

VIA E-MAIL

May 27, 2019

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

RE: EB-2018-0205 – EGI Federal Carbon Pricing - FRPO Submissions

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in the matter of the above subject proceeding.

We have examined the interrogatory responses, the record in this proceeding and argument-in-chief of the Applicant. From the outset of this proceeding, we identified our key concerns were issues of cost recovery and bill presentment. In preparing our submissions, we reviewed the submissions of the London Property Management Association (“LPMA”)¹. We support and adopt the submissions of LPMA.

In addition, we add one additional point that we trust is helpful to the Board: **What do customers want?** While there is no evidence in the application of market research on customer preferences, there is in the interrogatory responses²:

Enbridge Gas drew upon the information it acquired from the Cap and Trade Framework and Compliance Plan proceedings to inform its strategy regarding bill presentment for the Federal Carbon Charge. For example, in 2016, a focus group study was conducted related to the Ontario Cap and Trade Program, which stated³:

Respondents were nearly unanimous that whatever additional cost consumers have to bear as a result of the cap and trade program should be transparent to the consumer and that additional charges for cap and trade should be specifically referenced on natural gas bills.

It is surprising given this very specific input to the company’s considerations that a decision would be made to separate the facility-related charges and embed them in a rate that would completely obscure these costs from the customers in their bills.

¹ London Property Management Association, Written Submissions, May 27, 2019

² Exhibit I.CCC.4

³ EB-2017-0255 Exhibit B.Energy Probe.11; EB-2015-0363 Natural Gas Consumer Reaction to Ontario Government Reported Cap and Trade Plan (June 21, 2016), p. 5.

Enbridge provided its reasons for choosing to put this customer impact in delivery rates in argument- in-chief⁴ and LPMA provides strong rebuttal⁵ which we support. On the other hand, the company fails to address this fundamentally important factor as to why it would not meet this strong desire on behalf of the customers who will not only be paying these costs but also any costs associated with developing the bill presentment approved by this Board. It is clear that it can be done⁶.

In our view, there are many ways this customer imperative could be met. We would respectfully submit that this customer view could be satisfied by moving these facility-related charges to a line on the bill with appropriate information provided in an economical and expedient manner if the Board so directs.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers, EGDRRegulatoryProceedings - Enbridge Gas
Parties to EB-2018-0205

⁴ Enbridge, Argument-in-Chief, page 9, submitted May 14,2019

⁵ London Property Management Association, Written Submissions, pages 3-5. May 27,2019

⁶ Exhibit I.STAFF.14