

VIA E-MAIL
August 6, 2019

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

RE: EB-2019-0137 – Consultation to Review Gas Supply Plans – FRPO Request

REQUEST & SUPPORT

We act on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”). We are writing to request participation in the above subject proceeding. The long-term economic implications and the resulting rates impact 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 with 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, CONCERNS & INVOLVEMENT

The application was submitted to follow the Gas Supply Review process approved by the Board in the Gas Supply Framework proceeding, EB-2017-0129. FRPO has been a strong advocate for the Board’s increased involvement in reviewing and approving the Gas Supply decisions. We are concerned that while there was due process in the Framework proceeding much of that proceeding focused on the incorporation of renewables in the Gas Supply proceedings of the respective utilities. Further, at that time, there were two utilities at that time. However, now with one utility, one geographic area of the utility is buying market-based storage from its own parent company with little transparency for the Board to evaluate the prudence of the operating choices made by the utility which could potentially reduce the amount of market-based storage it requires. In addition, due to Enbridge’s ownership position in over 99% of the storage in Ontario, the Board has little insight into storage status decisions that affect the cost that end-use customers pay for load balancing services in the market. These issues were brought into the Enbridge-Union merger proceeding but not ruled upon as these issues were outside the scope of the proceeding¹.

¹ EB-2018-0306 Decision and Order, page 48.

Lastly, and most importantly, the Procedural Order provides for only 10 hours to review the 170 pages of evidence and prepare written questions for a single-day conference which will only afford sufficient time to respond to a fraction of the questions that will be asked. As this is the first proceeding to implement the developed framework, we believe these restrictions are not in the public interest. In comparison, stakeholders were afforded more preparation time for the mid-term review of the DSM Framework where the combined annual budgets of the utilities was **\$130 million**. The combined annual budgets of the first ever review of the respective Gas Supply plans is **\$2 billion**.

We would respectfully request the Board re-consider these restrictions to allow a more fulsome initial review. In the alternative, without presuming upon the issues that will arise in initial phases, we would encourage the Board to exercise its option to hold a hearing to ensure that elements of the Gas Supply plan and the evolving Ontario market's impact on ratepayers may be full canvased and considered.

FRPO requests the opportunity to be fully engaged in all aspects of the proceeding.

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. M. Kitchen – EGIRegulatoryProceedings - Enbridge Gas
T. Irwin - FRPO