

VIA E-MAIL

November 2, 2019

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

RE: EB-2019-0183– EGI Owen Sound Reinforcement & M17 Rate Class

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice ordered by the Board for this subject application. The Application by EGI is seeking order or orders for the purposes of creating a new rate M17 and reinforcing the Owen Sound line to serve new communities and provide for expected growth in consumption. The resulting rates impact the members of the FRPO.

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 believe strongly 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

There are two separate but connected issues in this proceeding. One issue is the application under section 90 for leave to construct an additional pipeline to reinforce the system. FRPO has participated in past Union Gas facilities proceedings and desires to assist the Board in reviewing the application in light of the rate impacts that would be generated by this Application.

The second issue under Section 36 is the establishment of the M17 rate and changes to M9 and T3. FRPO applied for and received intervenor status and eligibility for cost award in the original application, EB-2018-0244, in spite of the objection of Union Gas. In approving FRPO, the Board stated¹:

¹ EB-2018-0244 Procedural Order No. 1, issued October 24, 2018

“In response, FRPO noted that the proposal of a new rate class (M17) applicable to gas distributors could create a barrier for other providers to compete with Union Gas. FRPO submitted that any proposal that could increase the cost of gas expansion projects may have an impact on FRPO members. Accordingly, FRPO requested that its request for intervention and cost eligibility should be accepted.

Union Gas’ proposal, if accepted, will have implications on existing gas distributors and new entrants to the Ontario market and FRPO will not have an opportunity in a future proceeding to argue this matter. Therefore, FRPO is approved as an intervenor and is eligible to apply for an award of costs.”

FRPO respectfully requests involvement in all aspects of the review of this Application. We recognize that our request did not meet the deadline in the original Notice. While the Notice was received, it was not reviewed due to extenuating circumstances. If given intervenor status, we would accept the record and would collaborate with intervenors of similar interest and act in a responsible manner consistent the Board's Practice Directions. Further, DR QUINN & ASSOCIATES apologizes for the inconvenience to the Board and Staff.

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 Muscovy 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. B. Ott, EGIRegulatoryProceedings – EGI
Z. Crnojacki - Staff
Interested Parties EB-2019-0183