

VIA E-MAIL

December 17, 2019

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

RE: EB-2019-0273 Submissions

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) with respect to the submission filed by Enbridge Gas Inc (“EGI”) December 17, 2019. Given the condensed time frames in this proceeding, we are respectful of a timely submission.

EGI submitted a letter responding to Board staff inquiries but provided very little specific information in response to our inquiry. We had inquired about the approximately 30% increase in Nexus rates for the EGD Rate Zone in the last two years and seeking parallel information for the Union Rate zones. We have reviewed the references EGI provided but their response lacked a clear explanation for level of increase. Ideally EGI would have answered the questions asked and clarified the impact of various factors on the rapid escalation of cost for this transport.

Given our understanding of the Board’s desire for an expedited process for QRAM proceedings, we respect that we cannot attempt to get a more fulsome response in this proceeding. However, since the Board has already implemented an interim rate for January 1, 2020 in the Distribution Rates proceeding pending Phase 2 (EB-2019-0194), we respectfully submit that these rates could also be approved on an interim basis and, with the Board’s leave, we could pursue a better explanation of cost escalation in Phase 2 of the 2020 Distribution Rates proceeding. Further, in our view, EGI’s deference to the OEB Staff Report for our inquiry regarding testing gas supply evidence reinforces our concern that gas supply costs are not being evidenced and tested with the evolutions that have occurred¹.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. B. Ott – EGI, EGIRegulatoryProceedngs,
R. Murray – OEB Staff, Interested Parties EB-2019-0194

¹ EB-2019-0137 FRPO_Comments_ 20191021 pages 6-7