

VIA E-MAIL

January 2, 2020

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

**RE: EB-2019-0271 – EGI DSM 2021 – FRPO INTERVENTION REQUEST**

**REQUEST & SUPPORT**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) with respect to Notice published for the DSM plan of Enbridge Gas Inc for 2021 (EB-2019-0271) seeking Intervenor status.

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**

Our members' desire is to support public policy initiatives that are efficient and effective for DSM while striving to contribute to systems that would support coordination of programs and efficacy from investments made by ratepayers. As a result, we support the comprehensive review communicated by the Board in its September 16, 2019 letter. At the same time, we respect that this review would be informed by diverse opinions and potentially evidence that would likely result in an extended hearing making fundamental change for 2021 difficult.

In its application, Enbridge Gas Inc. (EGI) is seeking to extend the parameters of its approved 2020 DSM plan to 2021. Since filing its letter of application November 27, 2019, the Board has received a variety of opinions about the proposal. One aspect that has not been emphasized in these submissions is the appropriateness of extending the plans of two separate utilities has a basis for the costs and resulting cost consequences for the delivery of these programs under one utility. We believe this issue ought to be considered, amongst others, in determining the appropriateness of EGI's application.

**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  
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Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers - EGIRegulatoryProceedings  
J. Wasylyk – OEB Staff