

VIA E-MAIL

January 15, 2020

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

**RE: EB-2019-0255 Draft Guidelines for Natural Gas Expansion Proponents
FRPO Submissions**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Board's invitation to comment on the draft Guidelines for natural gas expansion. FRPO participated in EB-2016-0004 and commends the board for developing a balanced and principled approach to natural gas community expansion in that proceeding. We respect that the government has the authority to evolve the parameters around who potentially subsidizes the expansion. However, FRPO would encourage the Board to maintain the principles underpinning the decision in that proceeding while allowing for ministerial direction to override those components of the decision, such as funding, in their discretion.

That stated, FRPO supports the submissions of Energy Probe on this matter as their views are aligned with ours. In addition, we add the following submissions on matters not addressed by Energy Probe.

Proponent Technical Expertise

We believe that it is essential that any proponent has the wherewithal to provide safe and effective distribution service. Section 2.1 of Guidelines requests information on the proponent's expertise. While we commend staff for its inclusion, it is our view that this aspect of the proponent's background would likely be better evaluated by the Technical Standards and Safety Authority (“TSSA”). As the safety regulator for the natural gas industry for Ontario, we would respectfully submit that the TSSA ought to be involved in the review of expertise of those who would be designing, constructing, operating and maintaining the distribution system.

Annual Residential Consumption will Vary

New community expansion will bring gas to communities that historically have not had access. While these communities could be across the province, many will be northern communities where pipeline systems are not as extensive. Part 3.3 of the Guidelines propose an annual consumption of flat 2,200 m³ for the mass market. We would respectfully submit that this value should be allowed to vary based upon better information for the respective community. We note that while Enbridge Gas Inc. (“EGI”) uses an annual consumption of 2,200 m³ for its lowest consuming rate classes in the Union rate zones, while 2,400 m³ is used for the Enbridge Gas Distribution (“EGD”) rate zone. It is likely that some of the potential communities are further north than the EGD territory. We would respectfully encourage staff to consider this variability and allow forecasts for mass market consumption to be consistent with climate conditions of the community.

Respectfully Submitted on Behalf of FRPO,



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Principal
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c. Interested Parties – EB-2019-0255