

VIA E-MAIL

January 21, 2020

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

RE: EB-2019-0159– EGI 2021 Dawn Parkway Expansion Project

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 orders for the purposes of constructing an expansion to the Dawn Parkway system in the City of Hamilton. If approved, the project and 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 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 & INVOLVEMENT

The application requests the Board's approval of an addition to the Dawn-Parkway system. While FRPO appreciates the important role that natural gas plays in the economy of Ontario, our members would want to support the economically-rationale and environmentally sensitive expansion of system to deliver that energy. As such, we have advocated for the consideration of market-based solutions over facilities solutions in past proceedings.

In the matters of this application, EGI is requesting the Board make a determination on its Integrated Resource Plan ("IRP"). In our view, whether the facilities request and IRP determination are heard together or separate, it is in the public interest to have a close examination of alternatives to the facilities. These alternatives should be viewed on an integrated basis with system needs and capabilities. FRPO has assisted the Board in comparable matters in the past and would respectfully request participation in all elements of the proceeding the Board orders.

PROCEDURAL MATTERS

Given our experience, we believe an oral hearing may be necessary but would respectfully recommend the provision of a technical conference to ensure fulsome discovery of facilities and IRP technical matters prior to determining the need for written or oral hearing. In addition, we would respectfully request the reserving of our right to file evidence to assist the Board's consideration of alternatives.

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. A. Stiers, EGIRegulatoryProceedings, EGIRegulatoryProceedings – EGI
Z. Crnojacki – Staff
T. Irwin, A. Allen - FRPO