

VIA E-MAIL
May 11, 2020

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

RE: EB-2019-0137 – Consultation - LDC Gas Supply – FRPO Cost Claim - Reply

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to EGI’s letter of May 7th regarding our cost claim.

From the outset of this proceeding, we had identified concern over the time limitations placed on this proceeding¹. This was the first proceeding to implement and test a newly-adopted framework for the 5-year Gas Supply plan of the amalgamated utility with an annual budget of \$2 billion. We believed that a comprehensive review of not only the content of the applicant submission but also the efficacy of the process as a regulatory tool were critically important to the energy market in Ontario. As such, we acknowledged that our investment of time was greater than limits communicated² and accepted the Board’s discretion in this area.

While not surprised by EGI’s objection as we are accustomed to their approach in these matters, we are disappointed with their position given our work with EGI and Board staff to reduce potential conflicts which could have impacted the quality of submissions by both intervenors and the utility³. FRPO has been the “de facto” gas supply lead on behalf of the intervenor group during this last decade⁴ including many settlements where we worked with Enbridge Gas Distribution to develop workable solutions in the public interest^{5 6 7}. This leadership is not just our opinion⁸:

“Energy Probe has no expertise in detailed gas supply planning and leaves comments to FRPO and Mr. Quinn on behalf of intervenors.”

¹ FRPO_Participant_REQ_Cost Eligibility_20190806

² FRPO_COST CLAIM_20200413

³ FRPO_LTR_GS FRAMEWORK_20190926

⁴ EB-2015-0238 FRPO_Presentation_OEB_GAS SUPPLY CONSULT_20151125

⁵ EB-2012-0459 EGDI_Motion and Settlement Agreement_20131029

⁶ EB-2014-0276 Exhibit N1, Tab 1, Schedule 2

⁷ EB-2016-0215 Exhibit N1 Tab 1 Schedule 1 Page 7, Commitment 3 Heat Value

⁸ Energy Probe_Comments_20191021. Page 8

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Consistent with our communication in this proceeding, we submitted our reasonably incurred costs to the Board respecting the Board's ultimate determination. We can understand that EGI may be concerned about the perception of fairness if an award in excess of the stipulated limit were to be made to FRPO. In respect of that potential reason for their objection, we declare that if the Board sees value in our incremental investment of time in this proceeding, 100% of any incremental award above the stipulated limit will be donated to Interval House⁹ for the benefit of those they care for during these difficult times.

Thank you for your consideration of this request.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. M. Giridhar, M. Kitchen, B. Ott, EGI Regulatory Proceedings – EGI
P. Duguay – Staff
T. Irwin, A. Allen, L. Cooper – FRPO
Interested Parties – EB-2019-0137

⁹ Interval House is the first centre for abused women and children in Canada. We are leaders in the campaign for women's empowerment, providing innovative, specialized services that help women survivors of intimate partner violence and their children transform their lives and break the cycle of abuse. FRPO and our members have supported the work of [Interval House](https://www.intervalhouse.ca/) since 2007, funding innovative programs and helping to provide housing and resettlement for women and their families after they leave the shelter. <https://www.frpo.org/about/inourcommunity>