

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-2019-0294 – EGI Low Carbon Energy Program – FRPO Request for Intervention

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in regard to the Notice of Application produced by Enbridge Gas Inc. (“EGI”) on April 21st in the matter of the proposed Low Carbon Energy Program.

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 in 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

FRPO is a frequent intervenor in the natural gas applications. The proposed program of Low Carbon Energy seems aligned with the interest of reducing carbon combustion. However, with the introduction of the new component of hydrogen to the transported gas stream, all aspects of the traits of this component’s impact must be assessed. The utility has identified an adjustment to the bills of customers in respect of the lower heat value of hydrogen which is directionally correct. In addition, hydrogen is known to affect the integrity of carbon steel¹. This is a serious safety consideration of the program which must be thoroughly understood and potentially mitigated to ensure the benefits are worth the risks.

¹ “Hydrogen environment embrittlement of stable austenitic steels”. International Journal of Hydrogen Energy, Volume 37, Issue 21, November 2012, Pages 16231-16246

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
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. J. Denomy, EGIRegulatoryProceedings – EGI