

VIA E-MAIL

June 13, 2020

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

**RE: EB-2020-0094 – EGI Harmonized System Expansion Surcharge,
Temporary Connection Surcharge and Hourly Allocation Factor
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 some time in May by Enbridge Gas Inc for **Harmonized System Expansion Surcharge (SES), Temporary Connection Surcharge (TCS) and Hourly Allocation Factor (HAF)**. We are seeking intervenor status. We apologize for submission later than the June 9, 2020 deadline as we had not received notice but learned about the proceeding through another source.

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

Enbridge Gas has applied for approval to harmonize its System Expansion Surcharge (SES) of legacy Enbridge Gas Distribution and the Temporary Connection Surcharge of legacy Union Gas. The application also requests modification of the economic criteria used to determine the respective charges. These surcharges and the economic criteria were approved by the Board less than 5 years ago in a generic proceeding in which the Board made determinations to balance the interest of all stakeholders in matters of community expansion. The continuation of that balance with these proposed changes ought to be tested and understood.

In addition, Enbridge has proposed an Hourly Allocation Factor that distributes costs amongst prospective new customers. This concept warrants additional consideration.

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.

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