

VIA E-MAIL

October 8, 2020

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

RE: EB-2020 – EGI 2019 Earnings Sharing and Deferral Account Disposition

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application received from EGI September 18th. The Application by EGI is seeking order or orders clearing certain non-commodity related deferral accounts and sharing utility earnings pursuant to the Board-approved earnings sharing mechanism. 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 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 has participated in past Enbridge and Union Deferral Account Disposition applications and desires to assist the Board in reviewing the application considering the rate impacts that would be generated by this Application. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Enbridge Gas. Therefore, FRPO respectfully requests involvement in all aspects of the review of this Application.

The Notice issued by the Board requested input on written vs. oral hearing. Respectfully, we believe this determination is best made after discovery.

However, from our experience, we would recommend that the provision of a Technical Conference after Interrogatories responses have been made would be assist in the efficacy of the overall process. Being the first year of the newly consolidated utility, the aggregate financials create challenge to understand the activity in a historical context especially with transactions between the former legacy utilities. While interrogatories may provide the initial information sought, the efficacy of a technical conference would likely provide the Board with an enhanced record for the purposes of a potential settlement and the greater probability of the avoidance of the need for an oral hearing.

If the Board is uncertain of the merits of pre-determining the need for a Technical Conference, we would respectfully submit that the process would be enhanced through supplementary evidence filed by the company providing the individual legacy company reporting. Specifically, we would ask that the utility be directed to provide the EGI Utility Income (Ref: Ex. B, Tab 2, Schedule 2) and the schedules referenced in that specific schedule broken into the tables for each legacy utility company ideally in a similar format to their filings in the last few years. Further, the respective notes could then be referenced more definitely, including and especially, those that refer to transactions between the legacy utilities (e.g., M12 for EGD). In this way, the need for a supplemental discovery process may be reduced.

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 the above requests.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. A. Kacicnik, EGIREgulatoryProceedings – EGI