

VIA E-MAIL

October 26, 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 Dawn Parkway Withdrawal – FRPO Submission

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in regard to the request for withdrawal of their application by Enbridge Gas Inc. (“EGI”) October 22, 2020 in the above subject proceeding and in support of specific requests made in the submission of the Green Energy Coalition (“GEC”) earlier today.

From the time of the adjournment request, FRPO understood that the Pandemic had resulted in changes to forecasts for many companies and respected EGI’s desire to evaluate the demand underpinning its application. EGI’s withdrawal letter states the company “...has determined there is no longer a need for the Project in the time frame originally proposed”. However, the letter provides none of the information on which such a determination has been based. We respectfully submit that the Board should direct EGI to file that information. In our view, the Board and all those who participate in EGI’s LTC applications should have the 2020 information baseline that has led to the withdrawal of this application for use in considering the “reassessment” of capacity and need that the company says that it will be conducting in 2021.

Further, FRPO agrees with the substance of the item 1 of the directions proposed by GEC. Material should be filed now that identifies the key differences between the current situation compared to the situation presented in the now withdrawn application.

The second last paragraph of EGI’s letter announces that a “need” assessment will be conducted in 2021 to be followed by a new application for OEB review “if sufficient need can be confirmed”. The letter says nothing about the plan for considering “alternatives” in the context of the next application. FRPO agrees with Counsel for GEC, that the Board should issue directions in conjunction with the withdrawal of this application that will avoid a repeat by EGI of the pattern of untimely and incomplete identification and evaluation of alternatives that has been the subject matter of comment in several prior LTC Decisions. Requiring EGI to immediately embark upon an alternatives review and reporting process of the type suggested by GEC in item 3 of its letter is the kind of action

that is required to assure that “alternatives” will be identified and fairly assessed by EGI in a timely fashion in all of its future LTC applications.

For the above reasons, we respectfully submit that the addition of these conditions to the withdrawal request would serve the Board and the public interest.

Lastly, we support GEC’s request for the consideration of costs aligned with the direction the Board provides in response to EGI’s request, those made herein and requests by other parties.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers, EGI, EGIRegulatoryProceedings – EGI,
Z. Crnojacki, M. Millar – Staff,
Interested Parties – EB-2019-0159