

VIA E-MAIL

November 2, 2020

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

**RE: EB-2020-0192– EGI London Line Replacement
FRPO Request for Intervention – Further Information Requested**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to Procedural Order No.1 issued October 29th in EB-2020-0192. The following submissions are provided in response to the Board’s request and supplemental to our original request of October 10th.

Facilities Renewal is Economically Prudent Risk Management

Utilities require prudence in managing a portfolio of assets to serve customers as the costs are passed on to customers. As these assets age, it is incumbent on the utility to ensure the integrity of its system in the pursuit of security of supply and safety. This responsibility becomes a risk management exercise in evaluating the integrity of existing systems to determine if there is need to spend on enhanced maintenance, incremental investment or betterment or complete replacement. If the replacement decision is made, an assessment is made on the appropriate approach to replacement. The alternatives may include changing the sizing and/or pressure of the assets to improve service and/or reduce cost.

FRPO Provides Members and Board Gas Utility Experience

FRPO’s involvement in past infrastructure proceedings has tested the evidence of the utility in their consideration and documentation of the above risk management process in bringing applications to replace existing facilities. Our lead representative, Mr. Quinn, has over 30 years of experience in the natural gas industry which includes facilities planning, operations engineering and construction and overall director responsibility for an entire natural gas utility (CV attached). Using this expertise, FRPO has assisted the Board in numerous proceedings for more than a decade contributing to decisions that have benefitted our members.

Most recently FRPO intervened in EGI’s application for the replacement of the Windsor Line¹. From our experience, we identified that the evidence was insufficient to justify the applied-for pipe sizing for half of the project. The Board determined that the evidence did not

¹ EB-2019-0172. The current London Lines application references its Windsor Line project numerous times.

support the applied-for pipe size and approved a reduction in size for the segment identified by FRPO.²

FRPO Experience Applied to the London Lines Application

EGI has requested Leave to Construct under Section 90 of the OEB Act to replace the London Lines from Dawn to Strathroy. The application lays out the alternatives considered and proposes a replacement plan. In our original request for intervention, we stated the “plan warrants clarification”. This wording was chosen, in part, because, in our view, EGI has provided a more comprehensive documentation of its assessment of the integrity of the existing pipe and alternatives considered. However, in retrospect, we ought to have expressed our desire to test the process of analysis and determination of the applied-for approach as the ultimate decision arrived at by the Board will have cost consequences for our members.

We trust this additional information is of assistance to the Board in supporting our request for intervenor status and respectfully request a determination to allow our involvement.

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 our request.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. R. Torul, EGIRegulatoryProceedings – EGI; T. Irwin, A. Allen – FRPO
Attach.

² EB-2019-0172 Decision and Order, April 1, 2020

Dwayne R. Quinn, P. Eng., MBA
DR QUINN & ASSOCIATES LTD.
drquinn@rogers.com
(519) 500-1022

FOCUS

Assisting organizations with proactive adaptation to legislative and regulatory evolution and resulting market developments. Identifying the organizations' needs and goals and using strategic insights into public policy evolution to develop strategic and tactical initiatives to address proactively the upcoming opportunities and challenges. As a professional engineer with a Master's of Business Administration, I have over 30 years of utility experience including over 20 years influencing public policy and regulation; achieving personal credibility with governmental and regulatory bodies.

ACCOMPLISHMENTS

- Evolved a combined, traditional gas and water utility into a customer-sensitive organization delivering bottom line value to customers and owners
- Instituted Mutual Gains (Interest Based) Bargaining with labour union in 1999
- Directed market research of customers and owners to determine their desires for the natural gas utility in a deregulated environment
- Developed and implemented a direct purchase strategy to buy natural gas for the utility's customers
- Directed the branding of Kitchener Utilities as the Community-Owned Utility
- Re-contracted natural gas transportation and delivery agreements resulting in substantial savings
- Developed strategy to implement full cost recovery from water and wastewater systems receiving Council approval to represent the City at public hearings on the Draft Sustainable Water and Sewer Systems Act
- Implemented the principles of the Sustainable Water and Sewer Systems Act absent regulations resulting in two consecutive 18% water and wastewater rate increases with significant public acceptance
- Worked with the Ministry of the Environment, Ministry of Municipal Affairs and Public Infrastructure Renewal to evolve financial regulations to be more effective for municipal water utilities

RESULTS

- Customer understanding and appreciation for our service measured through Market Research
- Customer natural gas savings of over \$25 million in 7 years through implementation of direct purchase
- Incremental profits of over \$25 million dollars in same 7 years from the for-profit aspect of the natural gas utility while keeping customer rate increases below the rate of inflation
- Kitchener's water and wastewater utilities positioned to be fully financially sustainable
- Water and wastewater utilities across the province benefited from more effective financial planning regulations

BOTTOM LINE

I am a highly motivated and passionate professional who believes in service. My pursuit of the interests of those I serve is paramount. Success has been achieved by attaining a comprehensive understanding of the situation coupled with an ability to match stakeholders' interests with opportunities. Much of what was accomplished in Kitchener was unprecedented in public service.

ACADEMIC AND PROFESSIONAL

- Bachelor of Engineering Science (Chemical) - University of Western Ontario – 1985
- Association of Professional Engineers of Ontario – 1987
- Master's of Business Administration – Wilfrid Laurier University – 1997
- Completed courses in Master's of Law in Energy and Infrastructure – Osgoode PD - 2012-2014
- Certificate in Adjudication for Administrative Agencies, Boards & Tribunals – SOAR - 2014

Dwayne R. Quinn, P. Eng., MBA

EXPERIENCE

Union Gas Limited – 1985-92

Three successive positions of increasing responsibility covering Facilities Planning, Operations Engineering and Plant Construction. Improved simulation modeling techniques, pressure station design, workflow, performance, and customer service.

Babcock & Wilcox – Project Management – 1993-1994

Project management on a \$200 million steam generator replacement project.

City of Kitchener, Utilities Division – Director – 1998-2007, Engineer – 1994-98

Management, operations, regulatory lead and strategic direction of a combined gas and water utility. Contributed to the strategic evolution of Utilities to meet the challenges of natural gas deregulation and the implementation of the Sustainable Water and Sewer Systems Act, 2002.

DR QUINN & ASSOCIATES LTD – Principal - 2008-present

Established an independent consulting company providing advisory services in the fields of energy and infrastructure to clients in the public and private sectors.

Federation of Rental-housing Providers of Ontario (FRPO) Regulatory Consultant representation at the Ontario Energy Board, 2008-present.

Ontario Greenhouse Vegetable Growers (OGVG) Regulatory Consultant representation at the Ontario Energy Board, 2013-2016.

Utilities Kingston Natural Gas Management Consultant. Advising on natural gas procurement and asset contracting strategies as well as cost allocation and rate-making, 2008-present.

Heritage Gas Ltd. Consultant on Issues of Natural Gas Market Evolution including Self-Supply Practices, Contracting and Utility Accounting, 2013- present

COMMITTEES, ASSOCIATIONS & REPRESENTATIONS

Ontario Natural Gas Association – Board of Directors 1999-2000

Contributed to the survival through evolution of the association for the benefit of its members

Ontario Energy Association – Board of Directors 2000-2001

Contributed to the design and implementation of a business plan to evolve the energy association to reflect the changing market

Technical Standards and Safety Authority, Advisory Council 2000-2008

Contributed to the Authorities strategic direction of Ontario natural gas industry's safety regulator putting Public Safety First during deregulation of utility services

Ontario Energy Board – 1999-2007, 2008-present

Lead Kitchener Utilities regulatory representation including submission of written evidence and supporting testimony until 2007 and subsequently, regulatory consultant for FRPO.