

VIA E-MAIL

November 3, 2020

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

**RE: EB-2020-0212 – EGI Federal Carbon Pricing Program -**

**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 October 23<sup>rd</sup>. The Application by EGI is seeking for an order or orders for gas distribution rate changes related to compliance obligations under the *Greenhouse Gas Pollution Pricing Act*. 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 many rate applications for both Union Gas and Enbridge. We had not participated previous applications for the Federal Carbon Pricing Program believing that the pass through would be mechanistic. However, given the impact of recent deferral account creations and dispositions, including those for Covid, we want to test and understand how administrative costs will be mitigated, allocated and recovered. Further, the application speaks to upcoming investment in preparation for the coming Clean Fuel Standard which warrants understanding. 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 indicated that the decision regarding written vs. oral hearing would be determined later. We respectfully submit that this proceeding can likely be conducted by written hearing.

## **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](mailto: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. Stiers, EGIRegulatoryProceedings – EGI