

# DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

December 1, 2020

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

**RE: EB-2020-0198– EGI NPS 20 Waterfront Relocation – FRPO Request for Intervention**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Notice for EB-2020-0198. We apologize that our submission is one day after the deadline specified in the Notice, however, we did not receive the Notice directly and only recently became aware of the project.

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**

EGI has requested Leave to Construct to remove a small section of NPS 20 HP Steel Line and replace it with a considerably larger section in downtown Toronto. While the initial replacement is precipitated to accommodate work undertaken by the Waterfront Toronto’s Port Lands Flood Protection and Enabling Infrastructure Project (PLFPEI). However, our initial review of the evidence provides that there is no commitment by the PLFPEI project to pay for the costs of the project. Without secure funding, EGI may seek approval to dispose of the cost of the resulting project in rates. These rate changes would directly impact the members of FRPO.

FRPO is concerned that all aspects of alternatives be considered in the Board’s consideration and determination of this situation. Those alternatives are not necessarily limited to those in evidence. We wish to explore opportunities for continued safe and reliable service to customers in Toronto in an economic fashion.

The Notice indicated that the Board would make a procedural determination later in the proceeding. We request opportunity to be involved in all aspects of the proceeding that the Board deems necessary including manner of 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  
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Elmira, Ontario  
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Phone: (519) 500-1022  
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Thank you for your consideration of our request.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. J. Denomy, EGIRegulatoryProceedings – EGI  
Z. Crnojacki, R. Murray - OEB Staff