

DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

February 20, 2021

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–NPS 26 Branchton Relocation Project
FRPO Request for Late Intervention**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) to request late intervention status in the above subject proceeding.

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 under Sections 90 and 96 of the OEB Act to replace a 2km section of NPS 26 of the Dawn Parkway system in the Township of North Dumfries. We were unaware of this project until it arose in the Technical Conference for EB-2020-0181 on Wednesday, February 17th. Given our acquired understanding of the nature of this project and our submissions to the Board in the ongoing IRP proceeding, we are requesting the opportunity to seek late intervention status to assist the Board and demonstrate the efficacy of alternative solutions.

In reviewing the application, we understand that in addition to the applied for replacement, the alternatives considered by EGI were replacing the pipe with a larger size and leaving the pipe in the existing easement. Both alternatives were ruled out. However, the company did not evaluate the potential not replacing the pipe and, if necessary, replacing the minimal reduction of demand with an alternative of lower cost and life cycle. In our view, replacing the determined reduction in capacity with a marginal increase in delivered service to Parkway can be arranged at a much lower cost and without a multi-decadal commitment.

We understand that this request is being submitted after the deadline ordered by the Board for requesting intervention status. However, with the current adjournment of the proceeding, we respectfully submit that our intervention should not result in any additional delay and would assist the Board with consideration of an approach that would be aligned with its interests in advancing Integrated Resource Planning. If the Board were to grant us this opportunity, our commitment would be to submit interrogatories on the current application within three business days of acceptance and direction by the Board or a compressed time frame if EGI files an updated application. In our respectful submission, this approach would not create undue delay nor prejudice any party.

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
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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. A. Patel, EGIREgulatoryProceedings – EGI
R. Murry, J. Sidlofsky – Staff
K. Elson – ED
M. Brophy - PP