## DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

March 8, 2021

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

## RE: EB-2020-0134 EGI 2019 Deferral Acct. Disposition – TVDA Issue

**Introduction** 

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) with regard to the remaining disputed issue in EGI's 2019 Deferral Account disposition proceeding, EB-2020-0134. EGI submitted supplemental evidence on the TVDA issue. We participated with other intervenors in a virtual meeting to share perspectives on the issue and EGI's new evidence. We benefitted from the understanding gained and appreciated that other intervenors would take the lead on further discovery. As such, FRPO did not submit IR's on the remaining issue.

## **Submissions**

Upon review of the EGI's IRR'S and Argument-in-Chief, we saw no merit in the EGI proposals. We believe the proposals are inappropriate for the use of ratepayers' funds that will have to be recovered later from ratepayers. This is especially true for spending on IRP given these initiatives are not approved and have questionable requests for capitalizing IRP expenses.

Given discussions from our intervenor meeting, we asked for and received an advanced draft of the SEC submissions. These submissions are completely aligned with our perspective. Moreover, we submit they present a very compelling argument for the Board NOT to approve either of the EGI proposals. Further we support the request that the Board order the disposition of 100% of the balance in this account to ratepayers.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn Principal DR QUINN & ASSOCIATES LTD.

c. A. Kacicnik, EGIRegulatoryProceedings – EGI, K. Viraney – Staff, Interested Parties