

VIA E-MAIL

April 6, 2021

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

**RE: EB-2021-0293– EGI St. Laurent North Ottawa Replacement
FRPO Request for Intervention**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Notice of Application issued March 22nd for EB-2021-0293.

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 Section 90 of the OEB Act to replace the St. Laurent North Ottawa pipeline. We understand that gas delivered by the existing pipeline is important to a good portion of the Ottawa and Gatineau distribution systems. The application lays out only one alternative considered and that is the replacement of individual sections. In our view, the proposed plan warrants clarification in respect of the need, alternatives and timing especially given the Board’s desire to understand this project comprehensively¹.

FRPO is concerned that a number of projects have advanced by EGI with limited or missing information regarding important aspects of the project. The separation of the leave to construct proceeding from the approval of the funding through ICM creates a need to obtain discovery at the earliest possible point or risk the utility refusing to provide information

¹ EB-2019-0006 Decision and Order, September 26, 2019, pg. 7-8

pertinent to the prudence of their desired approach². The rate impact of these projects, if approved, directly affect our members.

The Notice of Application provides that the EGI has requested a written hearing. While we do not oppose that request, we believe the best time for that determination would be after the initial round of discovery. Whatever the Board decides, we respectfully request the 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
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. J. Denomy, EGIRegulatoryProceedings – EGI
Parties to EB-2020-0181

² EB-2020-0192 Letters Exchanged between FRPO seeking and EGI refusing information regarding pipe segment that was identified incorrectly in evidence, 20201214 and 20201215 and EB-2020-0181 Exhibit I.FRPO.31