

VIA E-MAIL

June 3, 2021

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

RE: EB-2021-0002 – EGI 2022-27 DSM – FRPO Submissions to PO#1

We are writing on behalf of the Federation of Rental-housing Providers of Ontario in response to the Board's request for submissions on Enbridge's request for interim approval of its 2022 DSM program year in Procedural Order No.1.

FRPO has reviewed the EGI application which creates more questions than answers regarding the requested changes to programs, incentives, market transformation and the overall timing of the application given the duration of the current framework. We have reviewed the more extensive submissions of multiple parties, some in advance, supporting a denial of the request. We do not believe it would be that helpful to the Board to recount our support for the many reasons provided by others.

We do support the denial of the request and for the Board to initiate a fulsome, transparent process that serves the customers whom the Board has established as a priority. To be concise, we add one point not made by others. EGI continues to emphasize the importance of the Board's approval in the continuity of DSM services to customers. In our respectful submission, given the timing of the application, the lack of consultation and evolution, the Board should direct program continuity at the risk of the EGI shareholder. Enbridge and the former Union Gas have provided their shareholders hundreds of millions in incentives over the decades without any risk to those shareholders. Given the expected future opportunity for the utility's shareholders as a monopoly provider of these programs, we submit that some shareholder risk to ensure a continuity of service is warranted.

Thank you for your consideration of our brief submissions.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. A. Patel, EGIRegulatoryProceedings – EGI, Parties EB-2021-0002