

VIA E-MAIL

July 9, 2021

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

**RE: EB-2021-0149 EGI 2020 Deferral Account Disposition  
FRPO Request for Intervenor Status and Eligibility for Cost Award**

**REQUEST & SUPPORT**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application received from EGI June 25<sup>th</sup>. The Application by EGI is seeking order or orders clearing certain non-commodity related deferral accounts and sharing utility earnings pursuant to the Board-approved earnings sharing mechanism. The resulting rates impact the members of the FRPO.

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**

FRPO has participated in past Enbridge and Union Gas Deferral Account Disposition applications and desires to assist the Board in reviewing the application considering the rate impacts that would be generated by this Application. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Enbridge Gas. Therefore, FRPO respectfully requests involvement in all aspects of the review of this Application.

The Notice issued by the Board requested input on written vs. oral hearing. Respectfully, we submit that this determination is best made after discovery. However, from our experience, we would recommend that the provision for the potential of a Technical Conference after Interrogatories responses have been made would be assist in the efficacy of the overall process.

With the merger of the legacy companies, the reporting contains merged accounting and complex intra-company transactions. In last year's proceeding to review the 2019 proposed dispositions<sup>1</sup>, obtaining a clear understanding of the application after interrogatories required a lengthy settlement conference and ultimately, a partial settlement with additional evidence required. In our view, a technical conference would likely be of greater assistance to the Board. The efficacy of a technical conference would likely provide the Board with an enhanced record for the purposes of a potential complete settlement and the greater probability of the avoidance of the need for an oral hearing which could support the proposed disposition of October 1<sup>st</sup>.

## **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](mailto:drquinn@rogers.com)

Thank you for your consideration of the above requests.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. J. Denomy, EGIRegulatoryProceedings – EGI

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<sup>1</sup> EB-2020-0134