

VIA E-MAIL

September 16, 2021

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

RE: EB-2020-0091 – Integrated Resource Planning - FRPO Reply – EGI Cost Claim Objection

Introduction

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to EGI's claim objections submitted September 9, 2021.

In its submissions, EGI identified four parties that they cited as exceeding the average of other cost claims. It is important to note that each of the four parties were involved in preparing presentations to the Board in the Presentation Day to advance alternate perspectives on IRP and the Framework for the benefit of the Board's consideration in the proceeding. EGI's objections make no distinction for time invested by these parties in discovery, research and preparation of these presentations and the further investment to formulate their respective submissions to the Board.

In addition, we offer the following responses to specific concerns regarding FRPO's claim.

FRPO's Representatives

It is unreasonable for EGI to object to FRPO's cost claim on the grounds that it includes hours for Mr. Quinn and Mr. Thompson for the entire generic proceeding. Mr. Quinn and Mr. Thompson are identified as FRPO's representatives in its letter of Intervention in this proceeding. Mr. Quinn and Mr. Thompson had collaborated in the LTC proceeding that EGI eventually withdrew. The continuance of a collaborative effort in this generic proceeding cannot reasonably be criticized.

Estimate for Preparing and Presenting Evidence

The "Estimate" that FRPO provided was limited in scope to one stage of the entire process. It was confined to preparation and presentation of evidence. It did not encompass interrogatories. It was never intended to reflect all stages of the proceeding. At the time that the estimate was prepared, the scope of the entire proceeding was still a work in progress.

It is unreasonable for EGI to use this "estimate" as a benchmark for discrediting and trivializing the presentation made by FRPO throughout the entire proceeding. As it turned

out, FRPO was denied the right to present evidence on the grounds that it could obtain responses to its supply side concerns by putting them to EGI in its interrogatories. FRPO then composed its interrogatories in an attempt to achieve that outcome. In its objections to FRPO's cost claims EGI now criticizes and trivializes these interrogatories. This is not reasonable.

FRPO made a sincere effort to present matters relevant to the identification of supply side alternatives in a generic context and their evaluation as options to incremental infrastructure and other non supply side alternatives, EGI's criticisms of this effort should be rejected as unfair and unreasonable.

OEB's Acknowledgement that Supply Side Alternatives are Part of IRP

EGI relies on the OEB's acknowledgement that Supply Side options are part of IRP to object to the scope of the case presented by FRPO. That acknowledgement does not assist in a determination of the factors that should be considered in identifying available options and how and when these alternatives should be assessed for comparison to other options. FRPO presented its perspective on these important supply side issues and was the only Intervenor to focus on these critical aspects.

Overall Value of the Supply Side Case Presented by FRPO

Supply Side options should deserve careful consideration in every case. They can produce significant savings for ratepayers compared to other alternatives. FRPO made a conscientious and balanced effort to present this important option in a generic context. Its representatives should be fairly compensated for the work they performed in presenting the Supply Side case. EGI's objections to FRPO's cost claims should be rejected.

All of Which is Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers, EGIRegulatoryProceedings - EGI
M. Parkes – OEB Staff
P. C. P. Thompson
Interested Parties – EB-2020-0091