

July 18, 2008

Ontario Energy Board
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Re: EB-2008-0106 -Draft Issues List

Attention: Ms. Kirsten Walli Board Secretary

Procedural Order No.1 in the above noted proceeding dated July 9, 2008 requested that any parties that wished to make written submissions on the draft issues list attached as Appendix B to the Procedural Order should file the submissions with the Board and deliver a copy of the submissions to all other parties on or before July 24, 2008.

The following submission is made on behalf of the Federation of Rental-housing Providers of Ontario (FRPO). FRPO has reviewed the submissions of LPMA and BOMA and generally concur with the points made and will, therefore, not submit supporting comments or slightly different approaches to those issues. Instead, FRPO respectfully submits that there may be benefit in considering the modification to include the following:

Principles: While the original notice of proceeding referred back to the Natural Gas Forum Report to provide the impetus for the instant proceeding, what appear to be lacking are principles or criteria to be used to determine if harmonization is beneficial and if so, which methodologies would be most effective. Establishment of principles or criteria as an initial foundation would provide a more consistent basis for utilities and intervenors to submit support and a rationale basis for the Board to decide between competing positions.

B: Load Balancing Obligations: The issues as proposed by Board staff with LPMA's additions are sufficient as long as it is understood that the starting point of customer forecasts for load balancing obligations is included. These methodologies are different in creation and the ability for the customer input to vary the agreed to forecast.

C: Cost Allocation: FRPO agrees with the proposed clarifications of LPMA and recommends the proposed inclusion of gas obtained by LDC in forced balancing of direct purchase customers.

FRPO appreciates Board staff providing this opportunity for input into the Issues setting process and trust that our comments will contribute to an effective process in the public interest.



Dwayne R. Quinn
Principal, DR QUINN & ASSOCIATES LTD.
On behalf of FRPO

c. V. Brescia, FRPO
Board Staff and Other Intervenors