

VIA E-MAIL

November 18, 2021

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

RE: EB-2021-0148 – EGI 2022 Rates Phase 2 - FRPO Request for Intervention

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to Notice of Application received from Enbridge Gas Inc. (“EGI”) on November 5th in the matter of Phase 2 of EGI’s 2022 Rates Application.

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 & IMPACTS

This is the third year of a bi-furcated proceeding to establish EGI annual rates. FRPO also notes that the application for approval of rate impacts is separated from the requests for Leave to Construct for two of the respective projects. While the projects may receive Leave from the Board to proceed, the appropriateness of the rate impacts is determined in this proposed proceeding. These proposed rate changes impact our members.

FRPO continues to be concerned with timing and prioritization of these projects relative to the Asset Plans and scale of the replacement and renewal projects filed by Enbridge. We also have previously expressed concern regarding Unaccounted for Gas about which EGI provides an update report. We wish to test the evidence and the utility process to establish the requested projects as requiring funding and continued diligence in the reduction of Unaccounted for Gas.

We appreciate that the Board has established that it will decide on oral versus written hearing at a later date. As such, FRPO respectfully reserves its position and potential submissions on this issue until after the interrogatory process when our submission may be of greater assistance to the Board.

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. R. Torul, EGIRegulatoryProceedings – EGI