

VIA E-MAIL

April 7, 2022

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

**RE: EB-2022-0089 – EGI QRAM Q2 2022 - FRPO Submissions**

**Introduction**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) regarding issues that arose during the review of Gas Supply costs and the company's proposed approach for the second quarter of 2022. While FRPO has participated in selective QRAM applications in the past on an exception basis, the evolution of Gas Supply discovery associated with the new Gas Supply Review framework had prompted our interest in reviewing more QRAM applications moving forward. The two issues we would like to address are Load Balancing costs and Customer Communication.

**Load Balancing Costs**

In the first quarter of 2022, Ontario saw colder than normal winter weather that was also experienced in many high population areas of North America. We respect that this level of cold resulted in the need for utilities to buy additional load balancing supply during that period. The weather coupled with geopolitical factors and a tight gas market led to significant volatility and higher prices.

FRPO inquired of EGI how it handled the incremental volume and costs associated with volumes purchased for Union South.<sup>1</sup> In its reply submission, EGI stated:<sup>2</sup>

*During the month of February, Enbridge Gas did purchase spot gas for the Union Rate Zones, however due to timing the costs and volumes of these purchases will not be included for cost recovery until the July 2022 QRAM. In*

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<sup>1</sup> FRPO\_QUESTION\_EGI\_QRAM 2022Q2\_20220314

<sup>2</sup> EGI\_REPLYSUB\_20220318\_signed

*the July QRAM, Enbridge Gas will provide a reconciliation of the drivers of those purchases and allocate costs to the appropriate accounts.*

We appreciate that the spot gas costs for Union South were not included and EGI will be providing this information in July of 2022. FRPO respectfully asks that in the committed reconciliation and allocation, EGI provides evidence that provides a comparison and differentiation of the handling of these costs relative to how those costs are handled in EGD territory.

### Customer Communication

FRPO has asked about EGI customer communication strategy over that last few QRAM's. We acknowledge that EGI is increasing the information available to customers about its Supply costs. We further support the improvements proposed by IGUA in its submissions on this matter.<sup>3</sup>

### Costs

FRPO has outlined the reason for our involvement in the above introduction. We trust our observations and request have been of benefit assistance to the Board and, as such, request a cost award of our reasonably incurred costs in the proceeding.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. R, Wathy, EGI Regulatory Proceedings  
Interested Parties - EB-2022-0089

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<sup>3</sup> IGUA\_LtrComment\_EGI Customer Communication Plan\_20220406