

VIA RESS

October 17, 2022

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

**RE: EB-2022-0203 Ridge Landfill RNG Project  
FRPO Request for Intervention**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to finding the Notice of Application dated September 23<sup>rd</sup> on the OEB website for EB-2022-0203.

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**

EGI has requested Leave to Construct under Section 90 of the OEB Act for Leave to Construct 6 km of NPS 4 to transport RNG in southwestern Ontario.

FRPO is concerned that a number of capital projects have advanced by EGI with limited or missing information regarding important aspects of the project. In this case, it is not clear what the need is for the maximum pressure of the new pipe and where it is tying into the EGI system. Further, given the nature of the project, the M13 rate carries some balancing provisions that ought to be considered for this and future RNG project. Very importantly, we would like to understand the ratepayer impacts of not only the facilities but also the commodity purchased through this project. Any resulting rate impacts affect FRPO members.

FRPO has assisted the Board in the past with facilities-related projects and wants to ensure this new realm of projects get due consideration in all aspects.

The Notice of Application provides that the Board intends to proceed by way of written hearing. While we do not oppose that approach, we believe the best time for that determination would be after discovery. Whatever the Board decides, we respectfully request the opportunity to be involved in all aspects of the proceeding that the Board deems necessary including manner of hearing.

**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 our request.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. A. Stiers, EGIRegulatoryProceedings – EGI