

DR QUINN & ASSOCIATES LTD.

VIA RESS, EMAIL

December 2, 2022

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

RE: EB-2022-0200 EGI 2024 Rebasing Application FRPO Request for Intervenor Status and Eligibility for Cost Award

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Notice of Application received from EGI November 14th. The Application by EGI is seeking order or orders under section 36(1) of the *Ontario Energy Board Act, 1998*, approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission, and storage of gas as of January 1, 2024. The resulting rates impact the members of the FRPO.

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 & PROCESS

FRPO has participated in past Enbridge and Union Gas Ratemaking and Deferral Account Disposition applications and desires to assist the Board in reviewing the application considering the rate impacts that would be generated by this Application. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Enbridge Gas. Therefore, FRPO respectfully requests involvement in all aspects of the review of this Application.

The Notice issued by the Board requested input on oral, electronic or written hearing. Respectfully, we submit that the most effective approach would be an oral hearing. Further, we would recommend that the provision of an electronic or oral Technical Conference after Interrogatories responses have been made would be assist in the efficacy of the overall process.

Given the duration since the last full rebasing for the respective utilities, the added complexity of integrating the two utilities and past Board directives ordering review of issues to the rebasing proceeding, there is a significant need for thorough discovery for transparency for the Board to make fully informed determinations. We respect that the utility has proposed certain time frames. However, we respectfully request that the Board provides sufficient time to enable due process and optimal outcomes.

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
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Elmira, Ontario
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Thank you for your consideration of the above requests.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. V. Innis, EGIRegulatoryProceedings – EGI