

DR QUINN & ASSOCIATES LTD.

VIA RESS

December 14, 2022

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

RE: EB-2022-0286 – EGI QRAM Q1 2023 - FRPO Submissions

Introduction

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) regarding above QRAM application. FRPO has participated in recent QRAM applications given the evolution of Gas Supply discovery associated with the new Gas Supply Review framework and our expressed concerns about the Board being provided the full picture¹.

FRPO Comments on this QRAM Application

We have reviewed the market aspects and proposed rates of the application and have no concerns to submit at this time. We understand that with continued volatility in the market, EGI has proposed limit recovery of deferred commodity charges. FRPO accepts that approach as being aligned with Board expectations.

FRPO Submissions on Ongoing Issues

In the 2022Q4 QRAM proceeding, FRPO strived to understand the significant escalation in load balancing costs during 2022. Our request for additional information provided only limited insight prompting our request for the Working Papers². We accept the Board's ruling on that request and have decided to pursue these concerns in the rebasing proceeding as the cost allocation and ratemaking will likely evolve.

Further, in the 2022Q3 proceeding, FRPO requested understanding of the pricing and utilization of Vector capacity to strive to comprehend the choices of the utility in contracting capacity that has poor economics³. We still hold those concerns and will continue to seek information that would assist the Board in proceedings that will be advanced in 2023.

¹ EB-2022-0072 FRPO_SUB_EGI GS UPDATE_20220527

² EB-2022-0219 & FRPO_SUB_EGI_QRAM 2022Q4_20220917

³ EB-2022-0150 FRPO_QUEST_EGI_QRAM 2022Q3_20220606 & FRPO_SUB_EGI_QRAM 2022Q3_20220613

Costs

FRPO has outlined the reasons for our involvement in the above introduction. We trust our ongoing involvement in the QRAM proceedings will be 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-2022-0286