

VIA RESS

February 25, 2023

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

**RE: EB-2023-0073 – EGI QRAM Q2 2023 - FRPO Comments on EGI Advanced Letter**

## Introduction

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) regarding the Enbridge Gas Inc. (EGI) letter notifying the Board of the potential of a greater than 25% reduction in commodity prices. This requirement for notification was directed by the Board in the QRAM Review Decision, EB-2014-0199.

## FRPO Comments on EGI's Notification

While ratepayers will no doubt get relief from the reversal of market prices during the last quarter, we are concerned that the notification was not comprehensive. Further, we are concerned that EGI provides the time and information needed to allow the Board to make an informed and timely decision for the next quarterly rate adjustment.

The Board direction in QRAM Review Decision included the direction: *The letter must include information regarding the 21-day strip used and the **forecasted PGVA balances that the distributor expects to clear.**<sup>1</sup> (emphasis added)* The notification letter did not provide the forecasted PGVA balances that EGI expects to clear. Over this last year, these PGVA balances have grown to unprecedented levels. While EGI's letter alludes to their continued review of *options for advancing the recovery of QRAM-related costs*,<sup>2</sup> in our view, this statement does not meet the onus directed by the Board.

Further, not knowing EGI's intent on the balances that could be cleared, the timing of their proposed application of March 10<sup>th</sup> may not provide sufficient opportunity for the Board and ratepayers to pursue more aggressive recovery. This recovery could potentially allow a return to a 12-month recovery of PGVA balances as directed in the original Board decision.<sup>3</sup>

---

<sup>1</sup> EB-2014-0199, Decision and Order, August 14, 2014, pg. 5.

<sup>2</sup> EGI, Notice of Commodity-Related Price Decrease Estimate for April 2023, filed February 24<sup>th</sup>, pg. 2.

<sup>3</sup> EB-2008-0106

At this juncture, FRPO respectfully submits that the Board could direct EGI to file a few days earlier than March 10<sup>th</sup> to present their options for advancing recovery of PGVA balances. This approach would be aligned with the Board's decision in allowing the 24-month recovery wherein the benefit of filing earlier was recognized.<sup>4</sup>

In our view, EGI ought to provide comprehensive continuity schedules showing the PGVA balances in a simple format that includes the alternative to return to a 12-month recovery of PGVA balances and if EGI does not, provide rationale for why it did not provide such an option.<sup>5</sup> In our respectful submission, this approach would serve ratepayers' interests and be aligned with recent Board directives in QRAM proceedings.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. R. Wathy, EGI Regulatory Proceedings  
Interested Parties - EB-2023-0073

---

<sup>4</sup> EB-2022-0150 Decision and Order, pg. 10.

<sup>5</sup> Ibid