

DR QUINN & ASSOCIATES LTD.

VIA RESS, EMAIL

March 23, 2023

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 Documentation of Deferred Technical Conference Questions

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO). The purpose of this letter is to request an efficient approach to achieving the discovery we attempted in the morning of the first day of the EGI 2024 Rebasing Technical Conference.¹

In preparing interrogatories to understand some aspects of Affiliate Transactions, we prepared three interrogatories that had two exhibit references: Exhibit 1, Tab 6 which labelled the prefix of interrogatories and Exhibit 1, Tab 3. We acknowledge that the Tab 6 should have been Tab 8. However, in receiving the interrogatory answers labelled as Tab 6 with no indication of the reference error, we did not perceive the error. As such in submitting our Time Estimates, we asked for 20 minutes to ask questions on Affiliate Transactions to Panel 1 and evidence reference of Exhibit 1, Tab 6.

During our question time, we were requested to ask the questions to future panels. Further, at the start of the afternoon session, we were informed by EGI that the error arose with the Tab labelling and that our questions should go to three different panels.² While the directions from EGI assisted, it is not clear what aspects of our questions (e.g. FRPO-7 did not receive direction) go to what Panel. Recognizing the tightness of the Technical Conference time available and desiring to expedite the process, we have included our questions below so that the respective EGI panels can be prepared at the outset of our question time to either respond to the question or indicate its acceptance of an undertaking request.

Technical Conference Questions

1.6-FRPO-7: In FRPO.7, in response to our question about EGI assesses prevailing market prices, the interrogatory response provided:

Enbridge Gas assesses market prices by leveraging the competitive bid process through a Request for Proposal or Request for Quote based on the value and scope of work.

In the technical conference, we asked the follow-up question asking for the metrics that EGI uses to assess the quality of service from a hydrovac contractor in the value proposition?

¹ REVISED Final Transcript EB-2023-03-22 TC1 March 22 2023, p.58, line17 to p.65, line 19

² REVISED Final Transcript EB-2023-03-22 TC1 March 22 2023, p.81, line 22 to p.82, line 8

1.6-FRPO-6: In FRPO.6, in response to our question about EGI assesses prevailing market prices, the interrogatory response provided:

Enbridge Gas assesses market prices by leveraging the competitive bid process through a Request for Proposal or Request for Quote based on the value and scope of work, contract term and resourcing needs.

In the technical conference, we asked how does one do this if the work is single-sourced?

We also requested that EGI provide the annual financial reports for Lakeside Performance Gas Services for the year prior to acquisition by Enbridge Inc. and years subsequent.

1.6-FRPO.5: In response to our question regarding sole sourcing to Tidal including purchases, assignments or other commercial transactions, the interrogatory response provided:

“Total EGI Revenue with Tidal” outlined in Attachment 1 contains transactions negotiated directly with Tidal and transactions awarded as a result of competitive bidding processes through Requests for Proposals (RFPs) or open seasons. Transactions included in the revenue total includes short-term storage, long-term transportation, short-term transportation, short-term exchanges and name change fees.

In the technical conference, we asked for a breakdown between the amount of the respective transactions (short-term storage, long-term transportation, short-term transportation, short-term exchanges) that were done by negotiation versus RFP.

We trust that submitting these questions in writing in advance of the panels will provide the opportunity for these inquiries to be handled efficiency.

Respectfully Submitted on Behalf of FRPO,

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Principal
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c. V. Innis, EGIRegulatoryProceedings – EGI
K. Viraney, Michael Millar – Staff
Interested Parties, EB-2022-0200