

VIA E-MAIL

July 3, 2023

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

**RE: EB-2022-0111– City of Kawartha Lakes incl. Bobcaygeon  
&  
Township of Cavan-Monaghan**

**FRPO Request for Completed Facilities Application**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to EGI’s letter of June 14<sup>th</sup> providing an updated Application and Evidence in the above proceeding. In reviewing the application, it is clear that, consistent with recent facilities applications<sup>1</sup>, EGI is not providing necessary evidence in defining the proposed piping systems and alternatives considered. We are asking that EGI provide the requirements laid out in the OEB’s Natural Gas Facilities Handbook.

The Natural Gas Facilities Handbook was finalized and issued by the Board March 31, 2022. Exhibit B and C of the Handbook stipulate filing requirements for the Project Need and Alternatives considered. These stipulations included the network analysis and examination of alternatives which would provide understanding of the design criteria, initial and ultimate capacity and assessment of alternative pipe sizing. A comparison with the subject application with these filing requirements reveals significant omissions in these data.

In the recent applications cited, FRPO attempted to elicit some of this information through interrogatories. However, in the particular case of the Selwyn application<sup>2</sup>, our assumption regarding a tie together of the systems was not confirmed making reducing the value of the data that was provided. The only way of obtaining an understanding of the assessment of the system and alternatives considered would be an additional step of discovery. If the filing requirements are met, a better understanding can be provided for the Board’s consideration without the inefficiency of additional discovery.

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<sup>1</sup> EB-2022-0156 and EB-2022-0248 did not provide the filing requirements of the Facilities Handbook.

<sup>2</sup> EB-2022-0156

For the current application which has been revised, we would request that EGI meet the requirements of Exhibit B and C including the output of the network analysis that would define initial capability of the proposed system and the forecasted additional capacity available at the end of the 10 year attachment forecast. Receiving this evidence prior to interrogatories would inform the Board and parties in an efficient manner allowing the parties to submit informed interrogatories to assist the Board.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. H. Ginis, EGI Regulatory Proceedings – EGI  
J. Fernandes, M. Millar – Staff  
Interested Parties