

VIA E-MAIL

July 31, 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 Intervention – Completion of Prefiled Evidence**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the updated Notice of Application produced May July 11<sup>th</sup> for EB-2022-0111 and the Board’s letter of July 5<sup>th</sup> in this proceeding. By way of this letter, FRPO is seeking intervenor status in the subject proceeding.

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**

EGI has requested Leave to Construct under Section 90 of the OEB Act to install a pipeline through the Township of Cavan-Monaghan and the city of Kawartha Lakes ultimately to serve the community of Bobcaygeon. The application lays out the proposed sizing of the feeder mains to serve the new customers. In our view, the proposed plan warrants clarification and an examination of the proposed sizing of the project.

In reviewing the application, it is clear that, consistent with recent facilities applications, 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, our assumption regarding a tie together of the systems was not confirmed 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.

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.

The Notice of Application provides that the EGI has requested a written hearing. While we do not oppose that request, we believe the best time for that determination would be after the initial round of discovery. Subject to the company's filing of facilities and network analysis, as requested above, we would recommend that provision of a technical conference to ensure effective discovery of pipe sizing and other alternatives. Whatever the Board decides, we respectfully request the opportunity to be involved in all aspects of the proceeding that the Board deems necessary including manner of hearing.

## **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  
DR QUINN & ASSOCIATES LTD.  
130 Muscovy Drive,  
Elmira, Ontario  
N3B 3B7

Phone: (519) 500-1022  
Email: [drquinn@rogers.com](mailto:drquinn@rogers.com)

Thank you for your consideration of our request.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. A. Stiers, EGIRegulatoryProceedings – EGI