

VIA RESS

August 28, 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-2022-0335 IRP Pilot Projects - FRPO Request for Intervention

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to finding the Notice of Application provided by Enbridge Gas Inc. (EGI) on August 11th regarding its proposed Integrated Resource Planning (IRP) Pilot projects.

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

In EB-2020-0091, the Board approved a Framework which directed EGI to consider IRP to meet its system needs.¹ The importance of considering and applying IRP to meet system needs has only increased with the recognition of the need for action in the area of Energy Transition. While we are pleased that EGI has submitted an application for IRP pilots, we are concerned with time delay and some of the technical aspects included in the application.

The Board’s IRP decision articulates its expectation that alternatives considered are in the best interest of EGI and its customers. As customers of EGI, the rate impact of these pilots and subsequent system need projects will be paid by our members. As such, FRPO requests the opportunity to assist the Board with fulsome consideration of this application.

¹ EB-2020-0091 Decision and Order, July 22, 2021

The Notice of Application provides that the EGI has requested a written hearing. While we do not oppose that request, given that this is the first IRP Pilot application, we believe the best time for that determination would be after discovery. Whatever the Board decides, we respectfully request the opportunity to be involved in all aspects of the proceeding that the Board deems necessary.

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

Thank you for your consideration of our request.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. EGIREgulatoryProceedings – EGI