

VIA RESS

November 6, 2023

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

**RE: EB-2022-0157 EGI Panhandle Regional Expansion Project  
Response to APPrO Submission**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the letter filed by APPrO November 5, 2023 in the Panhandle Regional Expansion Project. The letter mischaracterizes FRPO’s attempt to complete the record while seeking timely, regulatory efficiency as in their words “sitting on interrogatory responses”.

In our request for completion of FRPO.29, we are seeking understanding of summer peak conditions that Enbridge refused on the basis of relevance. FRPO establishes the relevance in our November 4<sup>th</sup> request. Our second request attempts to create understanding of the evolution of the project in a manner that allows a comparison of apples to apples. This request is spawned by EGI responses in the interrogatory responses provided this October.

FRPO recognizes that EGI would need to provide data from a simulation that witnesses not have available to them and that no party can create on its own. Further having the data presented visually would allow for clarity for the Board to see the evidence and hear our inquiry in context. FRPO is concerned that requesting an undertaking would not be as helpful.

APPrO recommends that FRPO should bring a motion if we want to address our concerns. However, in our respectful submission, such an approach could lead to further delays than the approach we chose. As such, we ask that EGI provide the requested information in our November 4<sup>th</sup> submission to assist the Board with the timely determinations of these matters.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. H. Ginis, EGIRegulatoryProceedings – EGI  
L. Murray, Z. Crnojacki - Staff  
Interested Parties – EB-2022-0157