

VIA RESS

November 8, 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-2022-0335 EGI IRP PILOTS**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in accordance with the Board’s PO#2 in the EGI IRP Pilots proceeding. Given the fact that these are the first IRP projects that are being designed to test a number of IRP measures, FRPO submits that the investment of time in a technical conference to ensure that the Board and stakeholders have opportunity to understand and test the efficacy of the proposed measures would be in the public interest.

As active participant in the IRP Technical Working Group (“TWG”), I still do not understand important aspects of these pilots. Accordingly, I understand the struggle that other stakeholders are having with these initiatives since they do not have the benefit of hours that I have invested in trying to assist EGI with developing IRP projects. FRPO provides the following examples of important items that are not fully informed by the application and subsequent IR responses.

**Southern Lake Huron**

By definition, IRP Alternatives address a constraint limiting the ability of the system to meet firm peak demands. One of our points of emphasis in our efforts on the TWG was the need to establish that the constraint is real through verification of the system modelling. In spite of that priority, system verification was not mentioned in the application. When asked through our interrogatory, EGI provided a Chatham & Sarnia Steady State Model Verification Report<sup>1</sup>. The report covers a wide geography but provides no reference from the IR response to the Verification Report to allow one to discern what points in the Report refer to the Southern Lake Huron system or location on system that feeds the impact area.

There is little information in the application and interrogatories that provides the pressures in the area of concern, what the deferred traditional system reinforcement would provide nor the criticality of current situation. This information should be fundamental to addressing the first three issues on the Issues List: Project Need, Alternatives and Proposal. We would respectfully submit that the evidence is lacking around the baseline condition to establish need and from which to measure alternatives. A technical conference would assist in allowing important evidence to be in front of the Board for consideration and determination of these matters.

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<sup>1</sup> Exhibit I.FRPO-2, Attachment 1

## Parry Sound

When EGI advanced the Parry Sound system as a pilot area, we were concerned that all supply side alternatives were considered to try to ensure that this area was a good candidate for the pilot. Our feedback in the TWG initiated consideration of some IRP Alternatives that EGI is now advancing. However, EGI did not provide technical information to the TWG that would have increased our understanding to allow us to assist in their alternative assessment.

In our interrogatories, we sought information around the existing system and the results of EGI's modelling for the alternatives proposed "*before and after each of the proposed modifications in Exhibit C (for 2025, 2027 and 2030) have been completed*"<sup>2</sup>. EGI's response provided the information requested for the existing system but then closed with "*The baseline facility alternatives will be updated throughout the Pilot Project term. The requested data for future years will take more time to complete than is available for the completion of the interrogatory responses.*" We don't understand this need for time as EGI would have needed to model the impact of the proposed modifications on the system listed in Exhibit C to identify those steps and forecast the year that the modification would be needed. FRPO submits that this information should be on the record and we are not comforted by EGI's statement about working with the TWG based upon our experience.

## Request

FRPO respectfully requests that the Board order a technical conference and directs EGI to file a completion of the IR response in advance of the conference to enable efficiency and effectiveness of the conference. In addition, consistent with the request of Pollution Probe<sup>3</sup>, we would support an earlier determination and approval of the proposed implementation of electric-IRP alternatives in the pilot projects.

Thank you for your consideration of our requests.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. B. Zimmer, EGIRegulatoryProceedings – EGI  
L. Murray, S. Cheng - Staff  
Interested Parties – EB-2022-0335

<sup>2</sup> Exhibit I.FRPO-5

<sup>3</sup> PollutionProbe\_Ltr\_re tech Conf\_20231107