

DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

July 15, 2024

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

RE: EB-2024-0111 FRPO Request for More Complete Information for Efficiency

We are writing on behalf of FRPO to request EGI's cooperation in striving for efficiency in the discovery process. We have reviewed the EGI's IRR's filed July 8th. Some of the IRR's leave gaps in requested information. These gaps, which could be filled by Undertaking in the Technical Conference, would require clarification in an oral hearing, which is not ideal. To reduce this risk, we are advancing a request for some additional information that, if provided before the Technical Conference would allow clarifications of this technical information in the Conference instead of the oral hearing.

Exhibit I.4.2-FRPO-46

In this IR we requested:

In Excel format, please provide the calculation of in-franchise load balancing requirements for each respective legacy utility that underpin the 2023 and, separately, the 2024 figures.

The provided attachment showed monthly consumption but not the corresponding monthly deliveries that would be used to calculate the aggregate excess amount. We respectfully request EGI complete the undertaking by providing those monthly deliveries with a clear indication that these deliveries do not including incremental deliveries used for the purposes of load balancing (i.e., please separate deliveries to meet seasonal consumption from load balancing deliveries).

Exhibit I.4.2-FRPO-85

In the series of questions in this IR, we were seeking understanding of the ICF assessment of the cost of deliverability in which we started with:

Please provide the complete derivation of the estimated cost including the sources of data and assumptions made... And closed with... Please provide a full derivation of the incremental storage value including source of data and assumptions made.

While some of our questions in the series were answered, the process of determination, the aggregation of data (correlating customer contracts to contractual parameters) and the assumptions made are quite unclear.

In response to our closing request, EGI asserted that *“The question is vague and overly broad”* while providing that data and assumptions were identified in the report and addendum without references to those used in this determination. Their final sentence states: *ICF is prepared to answer additional specific questions on methodology as well as the data sources and assumptions as appropriate.*

To strive for efficiency, we respectfully request EGI file the Excel spreadsheet(s), with working formulae, that derived the cost of deliverability including the data used. This provision would allow for analysis and data to be in front of stakeholders allowing for a more efficient exchange with ICF to achieve understanding.

Confidential Responses

On the weekend, we submitted the Declaration and Undertaking on behalf of FRPO to achieve access to the confidential IRR's. We have not been provided that access which is needed to develop our estimate of time requirements for the Technical Conference. We would ask that access be provided as soon as practicable.

Thank you for your consideration of the above requests.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. EGIRegulatoryProceedings – EGI