

VIA OEB PORTAL

August 8, 2024

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

**RE: EB-2024-0200 – EGI St. Laurent Pipeline Replacement Project
FRPO Request for Intervention**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Notice of Application received from Enbridge Gas Inc. (EGI) July 22, 2024 for a Leave to Construct Application for the St. Laurent Pipeline Replacement Project.

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(1) of the OEB Act to replace natural gas distribution pipelines and facilities that are located on St. Laurent Blvd. and the surrounding streets in the City of Ottawa. This is EGI’s second attempt to justify the replacement of this pipeline. FRPO assisted the Board in its review of the first attempt and has concerns that the project has not evolved to consider other alternatives. If approved, FRPO members would bear the cost consequences of the new pipeline potentially beyond its useful economic life.

The Notice of Application asks for input on the type of hearing. We believe the best time for that determination would be after the initial round of discovery and a technical conference. Our experience in the previous application informs that obtaining understanding may be difficult. 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 Muscovey 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.