

DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

August 14, 2024

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

RE: EB-2024-0111 EGI 2024 Rates Phase 2 - FRPO Submissions on HRAI Motion

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to PO#3 regarding the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI) Motion. We welcome the Board's invitation to comment and believe that it would be more efficient for us to make our submissions in writing than attend in person on Friday.

FRPO has appreciated the initiative by HRAI to bring these matters to the attention of the Board. We find it disconcerting that, with all of the evidence and discovery in Phase 1, the existence of the entity Enbridge Sustain (ES) was able to escape the record. Given the Board's stated and direct interest in how Enbridge Gas Inc. (EGI) was meeting the challenges of Energy Transition, it causes us concern that EGI would not mention this nascent division of the company growing internally. What would they have to hide in demonstrating that they were strategically evolving their offerings to adjust to the Transition?

HRAI's requested discovery and subsequent motion address applicability to Issue #27 so we will not repeat them. EGI has made simple statements about the lack of cross-subsidization of ES but are unwilling to demonstrate it. For those who have been in the industry for over a quarter century will remember the concern about the rental water heater programs being a loss-leader which was denied by the utilities. Once the Board was made aware of the real costs¹, not only was the Board concerned about cross-subsidy, but also, their findings included concerns about the utilities' accounting treatment distorting the true picture.²

In our respectful submission, HRAI is attempting to assist the Board with their requests for discovery, aided by their experience. As a result, we support HRAI's motion to compel production of this evidence in the public interest.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. EGIRegulatoryProceedings – EGI, Interested Parties

¹ EBRO 495

² EBRO 497 Decision with Reasons, pg. 21, section 2.4.13