

VIA OEB PORTAL

January 16, 2025

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

**RE: EB-2023-0345 – Notice of Proposal to Amend Sub-metering Code  
FRPO Comments**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to the Notice of Proposal to Amend the Sub-metering Code issued December 5<sup>th</sup>. The Notice provided an invitation for interested parties to file comments on the proposed amendments. FRPO respects that the proposed amendments were generated after surveys, targeted meetings and a jurisdictional review. We participated in the targeted meetings and now appreciate the Board's provision of a further opportunity to comment which is the purpose of this submission.

Proposed Amendments Balance Consumer Protection & Regulatory Efficiency

FRPO members strongly believe that the rental-housing sector is best served by a competitive marketplace that offers choice and affordability in the provision of energy services. We respect and appreciate the Board's understanding of the opportunity to enhance tenant awareness while considering the costs associated with changes. We respectfully submit that the Board's proposed amendments strike a balance between consumer protection and regulatory efficiency. Our hope and belief are that these changes will enhance the effectiveness of the sub-metering framework while minimizing unintended consequences for our tenants, USM providers and our members.

Further, FRPO appreciates that the Board has provided an allocation of implementation time prior to the finalized amendments coming into force. We thank the Board for its continued consideration of the impacts of these changes.

Respectfully submitted on behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. T. Irwin - FRPO