

VIA RESS & EMAIL

March 21, 2025

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

**RE: EB-2025-0078 – EGI QRAM Q2 2025 - FRPO Comments**

We are writing on behalf of the Federation of Rental- housing Providers of Ontario (FRPO) with our comments on EGI's proposed rates for the second quarter of 2025. The original proposal for rates, submitted March 11, requested a mitigation approach to diminish the impact of market-based commodity increases on the total customer bill. FRPO submitted questions March 13<sup>th</sup> requesting process explanations and evidentiary references to understand the allocation of cost variances. However, the federal government decision to eliminate the Federal Carbon Charge (FCC) late in the week, FRPO submitted supplemental questions on EGI's proposed approach to this material change.

**FRPO Supports the Revised Proposed Approach**

Given the impact and timing of the elimination of the FCC for consumers, FRPO respects and appreciates EGI's ability to revise its application fundamentally to incorporate the change and, as a result, exclude its request for rate impact mitigation. We respect that removal of the FCC from the company used gas is di minimis relative to the overall impact of removal<sup>1</sup> and are comforted by the variance account protection. Notwithstanding our request below for further information, FRPO fully supports EGI's proposed approach for April 1<sup>st</sup> rate setting.

**FRPO Continues to Request Understanding of Variances for Transportation & Load Balancing**

In response to FRPO's request included in our March 13<sup>th</sup> letter, EGI provided some helpful references that were omitted from Exhibit C, Tab 4, Schedule 4. However, it is important to understand how this data fits into the determination by understanding the methodology. In lieu of explanation, EGI provided the docket number (EB-2008-0106) of the QRAM generic proceeding and the statement that *the proposed quarterly Load Balancing and Transportation adjustments are allocated to the rate classes at the EGD rate zone based on 2018 Board approved cost allocation study.*<sup>2</sup>

<sup>1</sup> EGI\_Reply\_EB-2025-0078\_20250321

<sup>2</sup> Exhibit I.FPRO.1

We understand that what we are trying to understand is likely included in reviewing the records of both very large proceedings. However, respectfully, we would ask EGI to provide the specific evidentiary references that would allow a more efficient review of the evidence from these past proceedings. With those specific references, we will be able to understand better the principles and methodologies for the allocation of variances for Transportation and Load Balancing and apply that understanding to assist the Board in future matters. We request that EGI file their response providing those references under this docket to ensure completion of the record.

To be clear, in our respectful submission, approval of the rate application need not await EGI's cooperation with our request for specific supporting evidence from past proceedings.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. J. Egan, EGI Regulatory Proceedings  
Interested Parties - EB-2025-0078