

EB-2024-0111 : 1 : Dwayne Quinn

COST CLAIM NUMBER
2779

SUBMISSION DEADLINE DATE
June 13, 2025

CLAIM STATUS
Approved by Finance

EB#
EB-2024-0111: Rates: Distribution: Enbridge Gas Inc.

OTHER EB#S

PHASE #*
1

INTERVENOR
Quinn, Dwayne; +1 (519) 500-1022
drquinn@rogers.com

INTERVENOR COMPANY*
Federation of Rental-housing
Providers of Ontario, Toronto:
Cooperative

INTERVENOR TYPE
Full Registrant

HST RATE ONTARIO
13.00

EXCHANGE RATE

COUNTRY

HST NUMBER
82029 2415 RT 0001

LATE SUBMISSION ALLOWED
No

EXTENSION DEADLINE DATE

PARTICIPANTS

New	Non-Filing Participant First, Last Name	Filing Participant	Total (\$)	Total Hours	Participant Claim Status
No	,	Quinn, Dwayne; +1 (519) 500-1022 drquinn@rogers.com	123,640.21	302.50	Submitted

ATTACHMENTS

Attachment	Document Type	Import Message
FRPO EB-2024-0111 Cost Claim 061320251327.pdf		

TOTAL LEGAL/CONSULTANT/OTHER FEES
108,597.50

TOTAL DISBURSEMENTS
818.58

TOTAL HST
14,224.13

TOTAL CLAIM
123,640.21

TOTAL AMOUNT AWARDED

TOTAL HOURS CLAIMED
302.50

TOTAL HOURS DISALLOWED

REASON FOR
DISALLOWANCE

REASON FOR
DISALLOWANCE - 2

REASON FOR
DISALLOWANCE - 3

MAKE CHEQUE PAYABLE TO
FEDERATION OF RENTAL-HOUSING PROVIDERS OF ONTARIO

SEND PAYMENT TO ADDRESS
67 Yonge St.
Suite 801
Toronto, ON
M5E 1J8

ATTENTION
MS. L. COOPER

SUBMIT SECTION

I am a representative of the Party. I have examined all of the documentation in support of this cost claim. The costs incurred and time spent are directly related to the Party's participation in the OEB Process referred to above.

This cost claim does not include any costs for work done, or time spent, by a person that is an employee or officer of the Party as described in section 6.05 and 6.09 of the OEB's Practice Direction on Cost Awards.

The information (fees and disbursements) filed in this cost claim is complete and accurate and in accordance with the OEB's Practice Direction for Cost Awards and Appendix A, the Cost Awards Tariff.

SUBMITTED BY
DWAYNE QUINN

DATE SUBMITTED
June 13, 2025

CASE EB-2024-0111: Rates: Distribution: Enbridge Gas Inc.	COST CLAIM EB-2024-0111 : 1 : Dwayne Quinn	INTERVENOR NAME Quinn, Dwayne; +1 (519) 500-1022 drquinn@rogers.com	PARTICIPANT CLAIM STATUS Submitted
FILING PARTICIPANT Quinn, Dwayne; +1 (519) 500-1022 drquinn@rogers.com	NEW PARTICIPANT No	NON-FILING PARTICIPANT F. NAME	NON-FILING PARTICIPANT L. NAME
SERVICE PROVIDER TYPE* Consultant	YEAR CALLED TO BAR*	COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE* 36	HOURLY RATE 359
HST RATE CHARGED* 13.00	CV STATUS (FOR CONSULTANT/ANALYST) CV Provided within Previous 24 Months	LAST CV DATE March 04, 2024	OVERRIDE HOURLY RATE No
HST NUMBER 82029 2415 RT 0001	HEARINGS Yes	CONSULTATIONS No	DISBURSEMENTS Yes

HEARINGS

Hearings Hours	Hearings Subtotal (\$)	Hearings Total Tax (\$)	Hearings Total (\$)			
302.50	108,597.50	14,117.72	122,715.22			
<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
DISCOVERY						
Read and Research Application and Evidence	29.00	359	10,411.00	13.00	1,353.43	11,764.43
Preparation of Interrogatories	28.00	359	10,052.00	13.00	1,306.76	11,358.76
Review Interrogatory Responses	28.00	359	10,052.00	13.00	1,306.76	11,358.76
Technical Conference Preparation	18.00	359	6,462.00	13.00	840.06	7,302.06
Technical Conference Attendance	24.50	359	8,795.50	13.00	1,143.42	9,938.92
Technical Conference Follow-up	25.50	359	9,154.50	13.00	1,190.09	10,344.59
Subtotal of DISCOVERY	153.00		54,927.00		7,140.52	62,067.52
PROCEDURAL						
Preparation of Issues List Submission	3.50	359	1,256.50	13.00	163.35	1,419.85
Attendance at Issues List Conference		359		13.00		
Preparation for a Confidentiality Request		359		13.00		
Prepare Submissions on Confidentiality		359		13.00		
Preparation of Motion(s) Materials		359		13.00		
Prepare Submissions on the Motion(s)		359		13.00		
Attendance at Hearing on Motion(s)		359		13.00		
Review Procedural Documents		359		13.00		

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
Subtotal of PROCEDURAL	3.50		1,256.50		163.35	1,419.85
INTERVENOR EVIDENCE						
Preparation of Intervenor Evidence		359		13.00		
Interrogatory Responses		359		13.00		
Preparation of Witness(es) for Attendance at Hearing		359		13.00		
Subtotal of INTERVENOR EVIDENCE	0.00		0.00		0.00	0.00
SETTLEMENT CONFERENCE						
Preparation for Settlement Conference	33.50	359	12,026.50	13.00	1,563.45	13,589.95
Attendance at Settlement Conference	56.50	359	20,283.50	13.00	2,636.86	22,920.36
Preparation of Settlement Proposal	4.50	359	1,615.50	13.00	210.02	1,825.52
Attendance at Presentation to Panel	4.50	359	1,615.50	13.00	210.02	1,825.52
Subtotal of SETTLEMENT CONFERENCE	99.00		35,541.00		4,620.35	40,161.35
WRITTEN ARGUMENT						
Written Submissions	14.00	359	5,026.00	13.00	653.38	5,679.38
Subtotal of WRITTEN ARGUMENT	14.00		5,026.00		653.38	5,679.38
ORAL ARGUMENT						
Preparation for Oral Hearing	13.50	359	4,846.50	13.00	630.05	5,476.55
Attendance at Oral Hearing	19.50	359	7,000.50	13.00	910.07	7,910.57
Oral Submissions		359		13.00		
Attendance at Oral Submissions		359		13.00		
Subtotal of ORAL ARGUMENT	33.00		11,847.00		1,540.12	13,387.12
DECISION						
Review Decision		359		13.00		
Review Rate/Accounting Order		359		13.00		
Prepare Submission on Rate Order		359		13.00		
Subtotal of DECISION	0.00		0.00		0.00	0.00
OTHER						
Other Attendance (e.g., Intervenor Conferences)		359		13.00		
Subtotal of OTHER	0.00		0.00		0.00	0.00
TOTAL SERVICE PROVIDER FEES						
Total Service Provider Fees	302.50		108,597.50		14,117.72	122,715.22

Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
FRPO_DRQ_INV_EGI REB	Time Docket and Invoice	
PH2_20250612.pdf		
FRPO_CVR_COST CLAIM_20250612.pdf	Cover Letter	

DISBURSEMENTS

Disbursement Subtotal(\$)	Disbursement Total Tax(\$)	Other Taxes/Tips Total(\$)	Disbursement Total(\$)
818.58	106.41	0.00	924.99

<u>Name</u>	<u>ATT.</u> <u>REQ'D</u>	<u>ATT.</u> <u>PROV</u>	<u>Qty</u>	<u>\$/</u> <u>Unit</u>	<u>Net</u> <u>Cost</u>	<u>HST</u> <u>Rate</u>	<u>HST</u>	<u>Other</u> <u>Taxes/Tip</u>	<u>Total</u>	<u>Rationale/</u> <u>Comment</u>
Scanning/Photocopy (Internal)						13.00				
Scanning/Photocopy (External)						13.00				
Printing (Internal)						13.00				
Printing (External)						13.00				
Courier						13.00				
Teleconference						13.00				
Travel: Air						13.00				
Travel: Car Rental						13.00				
Travel: Gas						13.00				
Travel: Car Mileage – Southern Ontario	Yes	Yes	280.00	0.40	99.12		12.88		112.00	
Travel: Car Mileage – Northern Ontario				0.41						
Travel: Rail						13.00				
Travel (Other)						13.00				
Parking	Yes	Yes	3.00	39.82	119.46	13.00	15.53		134.99	
Taxi						13.00				
Accommodation	Yes	Yes	3.00	200.00	600.00	13.00	78.00		678.00	
Other						13.00				
Total Disbursements:					818.58		106.41	0.00	924.99	

Attachments

<u>Attachment</u>	<u>Import Message</u>
AVALON SUITES 20240912.pdf	
AVALON PARKING 20240912.pdf	
130 Muscovy Dr to Avalon Suites Yorkville - Google Maps.pdf	

Hearings, Consultations, Disbursements Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
FRPO_DRQ_INV_EGI REB PH2_20250612.pdf	Time Docket and Invoice	Hearings	
FRPO_CVR_COST CLAIM_20250612.pdf	Cover Letter	Hearings	
AVALON SUITES 20240912.pdf	Accommodation	Disbursements	
AVALON PARKING 20240912.pdf	Parking	Disbursements	
130 Muscovy Dr to Avalon Suites Yorkville - Google Maps.pdf	Travel: Car Mileage – Southern Ontario	Disbursements	

DR QUINN & ASSOCIATES LTD.

130 Muscovy Drive,
Elmira, ON N3B 3P7
(519) 500-1022
drquinn@rogers.com

Invoice

Date	Invoice #
2025-06-13	307

Invoice To
Federation of Rental-housing Providers ON 801-67 YONGE STREET, TORONTO, ON M5E 1J8

Terms
Net 60

Service Dates	Description	Qty	Rate	Amount
	FRPO REPRESENTATION IN EB-2024-0111 EGI REBASING PHASE 2			
2024-05-02	REVIEW HRAI, ED, EGI CORRESPONDENCE, REVIEW UPDATE EVIDENCE, ID ISSUES	2	359.00	718.00
2024-05-04	REVIEW EVIDENCE, ID ISSUES	2.5	359.00	897.50
2024-05-07	REVIEW EVIDENCE, ID ISSUES	1	359.00	359.00
2024-05-09	REVIEW HRAI DRAFT, ED SUBMISSIONS ON ISSUES, BRIEF TO CLIENT FOR SUPPORT	1	359.00	359.00
2024-05-13	REVIEW EVIDENCE, REVIEW PHASE 1 DECISION, PREPARE SUBMISSIONS ON DRAFT ISSUES LIST	3.5	359.00	1,256.50
2024-05-15	REVIEW EVIDENCE (CHECK COMMENTS)	1	359.00	359.00
2024-05-22	REVIEW EVIDENCE, ID ISSUES	0.5	359.00	179.50
2024-05-23	REVIEW EVID, ID ISSUES, REVIEW ORIGINAL EVID	2	359.00	718.00
2024-05-24	REVIEW EVIDENCE, ID ISSUES	1	359.00	359.00
2024-05-25	REVIEW EVIDENCE, ID ISSUES	1	359.00	359.00
2024-05-29	REVIEW EVID, ID ISSUES, REVIEW DAWN CORUNNA DISCOVERY	2.5	359.00	897.50
2024-05-30	REVIEW EVID, PREP NOTES ON APPROACH	2	359.00	718.00
2024-05-31	REVIEW EVID, PREP NOTES, CALL W/STAFF	1	359.00	359.00
2024-06-02	REVIEW EVID, RECONCILE IRR'S FROM PHASE 1	2	359.00	718.00
2024-06-10	REVIEW EVID, ID ISSUES, REVIEW DAWN CORUNNA DISCOVERY	3.5	359.00	1,256.50
2024-06-11	REVIEW IN CONJUNCTION W/GSP, NOTE ISSUES	2	359.00	718.00
2024-06-12	PREPARE ISSUE SUMMARIES, REVIEW PHASE 1 RECORD, EVIDENCE	2	359.00	718.00
2024-06-13	DRAFT IR's, REVIEW DAWN CORUNNA PROCEEDING	3	359.00	1,077.00
2024-06-14	DRAFT IR's, BOARD STAFF DISCUSSION, STORAGE ISSUES W/INTERVENOR, EMAIL EGI RE: PHASE 1 IR DEFERRALS	5	359.00	1,795.00
2024-06-15	DRAFT IR's	6	359.00	2,154.00
2024-06-17	REVIEW PHASE 1 IRR's, PHASE 2 EVIDENCE, DRAFT IR's, INTERVENOR DISCUSSIONS	4.5	359.00	1,615.50
		Total		

GST/HST No. 820292415

DR QUINN & ASSOCIATES LTD.

130 Muscovy Drive,
Elmira, ON N3B 3P7
(519) 500-1022
drquinn@rogers.com

Invoice

Date	Invoice #
2025-06-13	307

Invoice To
Federation of Rental-housing Providers ON 801-67 YONGE STREET, TORONTO, ON M5E 1J8

Terms
Net 60

Service Dates	Description	Qty	Rate	Amount
2024-06-18	DRAFT IR's, REVIEW GSP UPDATE EVIDENCE	3.5	359.00	1,256.50
2024-06-19	DRAFT, REFINE IR's, SUBMIT	4.5	359.00	1,615.50
2024-06-21	REVIEW IRR's FROM PHASE 1, DETERMINE APPLICABILITY TO PHASE 2, SUBMIT	1.5	359.00	538.50
2024-07-03	REVIEW EGI SUSTAIN EVIDENCE AND HRAI IR's	1	359.00	359.00
2024-07-09	REVIEW IRR's , ID CONCERNS & NON-ANSWERS	5.5	359.00	1,974.50
2024-07-10	REVIEW IRR's , ID CONCERNS & NON-ANSWERS, REVIEW COST ALLOCATION FROM EB-2005-0520, ADJUSTMENTS IN EB-2010-0039	3.5	359.00	1,256.50
2024-07-11	REVIEW IRR's , ID CONCERNS & NON-ANSWERS, REVIEW COST ALLOCATION FROM EB-2005-0520, ADJUSTMENTS IN EB-2010-0039	4	359.00	1,436.00
2024-07-12	REVIEW IRR's, CALL W/INTERVENORS	3.5	359.00	1,256.50
2024-07-14	REVIEW IRR's , ID CONCERNS & NON-ANSWERS	2.5	359.00	897.50
2024-07-15	REVIEW IRR's, SUBMIT LETTER ON OMITTED ANSWERS	4	359.00	1,436.00
2024-07-16	REVIEW CONFIDENTIAL IRR's, DOWNLOAD SPREADSHEET, CORRELATE RESPONSES	2.5	359.00	897.50
2024-07-17	CALL W/STAFF, ORGANIZE ISSUES, SUBMIT TECH CONF ESTIMATES	1.5	359.00	538.50
2024-07-18	COLLABORATION W/INTERVENORS, HISTORICAL ANALYSIS UTIL & NON_UTIL, REVIEW PAST PROCEEDINGS	5.5	359.00	1,974.50
2024-07-19	ANALYSIS, REVIEW PAST PROCEEDINGS, PREPARE TECH CONF QUESTIONS, REVIEW UPDATES	6.5	359.00	2,333.50
2024-07-20	PREPARE TECH CONF QUESTIONS, ANALYSIS OF CAPITAL ALLOCATIONS, REVIEW PAST PROCEEDINGS	4.5	359.00	1,615.50
2024-07-22	ATTEND TECH CONF (6.5), REVIEW TRANSCRIPT, REFINE SPREADSHEETS TO SUBMIT WITH PHASE 1 IRR's, FINALIZE UTIL/NON-UTIL ALLOCATIONS, SEND TO INTERVENORS (3.5)	10	359.00	3,590.00
2024-07-23	ATTEND TECH CONF INCLUDING LUNCH RE-WORK OF QUESTIONS (7), CONTINUED RE-WORK OF QUESTIONS FOR PRIORITIZATION(2) INCLUDING REVIEW OF EB-2005-0520 & 2010-0039	9	359.00	3,231.00
		Total		

GST/HST No. 820292415

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Invoice To
Federation of Rental-housing Providers ON 801-67 YONGE STREET, TORONTO, ON M5E 1J8

Terms
Net 60

Service Dates	Description	Qty	Rate	Amount
2024-07-24	ATTEND TECH CONF (6.5), REVIEW TRANSCRIPT, REFINE SPREADSHEETS TO SUBMIT WITH PHASE 1 IRR's, FINALIZE UTIL/NON-UTIL ALLOCATIONS, SEND TO INTERVENORS (3.5)	10	359.00	3,590.00
2024-07-25	ATTEND TECH CONF (4.5), PREP NOTES(0.5)	5	359.00	1,795.00
2024-07-27	DEVELOP THE PRESENTATION OF COST ALLOCATION FROM THE ANALYSIS FOR UTILITY/NON-UTILITY, SEND TO INTERVENOR	2	359.00	718.00
2024-07-29	RECEIVE FEEDBACK, ENHANCE PRESENTATION, PREPARE COVER & SUBMIT	1.5	359.00	538.50
2024-08-06	REVIEW UNDERTAKINGS, EMAIL INTERVENOR, RESEARCH EGD ALLOCATION METHODOLOGY	3.5	359.00	1,256.50
2024-08-07	FURTHER RESEARCH, COMPILE RESULTS, SEND TO INTERVENOR, CALL W/INTERVENOR, EMAIL EGI AND STAFF WITH PROPOSED COMPROMISE TO GET DISCOVERY	2.5	359.00	897.50
2024-08-22	REVIEW UNDERTAKINGS, INTERVENOR ANALYSIS & COMMUNICATION	1	359.00	359.00
2024-08-29	REVIEW UNDERTAKINGS, NOTE FOLLOW-UP ISSUES, CONCERNS	1.5	359.00	538.50
2024-09-03	REVIEW INTERVENOR SUMMARY ON STORAGE ALLOCATIONS, REVIEW RECORD	4	359.00	1,436.00
2024-09-04	INTERVENOR MEETING, REVIEW PHASE 1 COST ALLOCATION, SUMMARIZE GSP,	6.5	359.00	2,333.50
2024-09-05	REVIEW TECH CONF TRANSCRIPTS, UNDERTAKINGS AND RELATED IRR's, INTERVENOR MEETING	5	359.00	1,795.00
2024-09-06	REVIEW UNDERTAKINGS, INTERVENOR COMMUNICATION, CONSULTATION, COMPILE ADVANCED QUESTIONS, SEND TO EGI	6	359.00	2,154.00
2024-09-07	REVIEW RECORD - PREP FOR SETTLEMENT	2	359.00	718.00
2024-09-09	REVIEW RECORD - PREP FOR SETTLEMENT	1.5	359.00	538.50
2024-09-10	ATTEND SETTLEMENT CONF(7)+ANALYSIS & INTERVENOR COMMUNICATION POST MEETING	8.5	359.00	3,051.50
		Total		

GST/HST No. 820292415

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Invoice

Date	Invoice #
2025-06-13	307

Invoice To
Federation of Rental-housing Providers ON 801-67 YONGE STREET, TORONTO, ON M5E 1J8

Terms
Net 60

Service Dates	Description	Qty	Rate	Amount
2024-09-11	ATTEND SETTLEMENT CONF(7)+ANALYSIS & INTERVENOR	7.5	359.00	2,692.50
	COMMUNICATION POST MEETING			
2024-09-12	ATTEND SETTLEMENT CONF(5)+REVIEW LEVELIZED	5.5	359.00	1,974.50
2024-09-13	ATTEND SETTLEMENT CONF(4)+REVIEW RESPONSES & RECONCILE WITH EVIDENCE	4.5	359.00	1,615.50
2024-09-14	REVIEW OFFER, CONSIDER APPROACH, DISCUSS W/INTERVENOR	1	359.00	359.00
2024-09-17	ATTEND SETTLEMENT CONF (3)+ANALYSIS OF UFG (1.5)	4.5	359.00	1,615.50
2024-09-18	ATTEND SETTLEMENT CONF (6) + REFINE STORAGE ANALYSIS, MEET W/INTERVENORS TO EVOLVE PROPOSAL(2)	8	359.00	2,872.00
2024-09-19	ATTEND SETTLEMENT CONF(6)	6	359.00	2,154.00
2024-09-20	ATTEND SETTLEMENT CONF(3)+ANALYSIS & INTERVENOR COMMUNICATION	3.5	359.00	1,256.50
2024-10-03	PREP FOR AND CALL W/INTERVENOR ON STORAGE ISSUES	1.5	359.00	538.50
2024-10-04	CONFERENCE CALLS W/INTERVENORS ON STORAGE ISSUES	1	359.00	359.00
2024-10-06	REVIEW INTRV PROPOSAL, RESEARCH, ANALYSIS & RESPOND, REVIEW INTRV PROPOSAL & RESPOND	2.5	359.00	897.50
2024-10-07	ATTEND SETTLEMENT CONF (7), REVIEW INTERVENOR COMMUNICATION	7.5	359.00	2,692.50
2024-10-08	ATTEND SETTLEMENT CONF (4), REVIEW INTERVENOR COMMUNICATION	4.5	359.00	1,615.50
2024-10-09	ATTEND SETTLEMENT CONF (4.5)	4.5	359.00	1,615.50
2024-10-21	REVIEW SETTLEMENT PROPOSAL (2), REVIEW REFERENCES, PULL SETTLEMENT RESPONSES, SEND TO INTERVENORS	2.5	359.00	897.50
2024-10-31	REVIEW DRO NUMBERS, REVIEW SETTLEMENT AGREEMENT, PROPOSE FINAL CHANGE	2	359.00	718.00
2024-11-18	ATTEND MOTION HEARING AND SETTLEMENT PRESENTATION	4.5	359.00	1,615.50
2024-11-30	REVIEW DECISION ON SETTLEMENT, SCOPE REMAINING ISSUES FOR CROSS ESTIMATE TO STAFF	2	359.00	718.00
		Total		

GST/HST No. 820292415

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Invoice

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2025-06-13	307

Invoice To
Federation of Rental-housing Providers ON 801-67 YONGE STREET, TORONTO, ON M5E 1J8

Terms
Net 60

Service Dates	Description	Qty	Rate	Amount
2014-12-06	REVIEW EVIDENCE ON REMAINING ISSUES GOING TO HEARING	2.5	359.00	897.50
2024-12-11	REVIEW CORRESPONDENCE ON ISSUES, COMMENTS ON DECISION	1.5	359.00	538.50
2024-12-13	REVIEW RECORD ON REMAINING ISSUES, PROCEDURAL	2	359.00	718.00
	CORRESPONDENCE, DETERMINE PRIORITY			
2024-12-16	FINAL EVIDENCE REVIEW INCLUDING UPDATE EGI RESPONSE, PREP	3.5	359.00	1,256.50
	QUESTIONS FOR CROSS			
2024-12-17	ATTEND ORAL HEARING	7	359.00	2,513.00
2024-12-18	ATTEND ORAL HEARING	7	359.00	2,513.00
2024-12-19	ATTEND ORAL HEARING	5.5	359.00	1,974.50
2025-01-28	REVIEW AND CONSIDER ED-GEC EVIDENCE	2	359.00	718.00
2025-02-07	REVIEW EGI AIC, REVIEW TRANSCRIPT, CALL W/INTERVENOR TO	3.5	359.00	1,256.50
	COMPARE VIEW			
2025-02-12	REVIEW RECORD, ANALYZE RNG PRICE IMPACT ON SYSTEM GAS,	2	359.00	718.00
	DEVELOP POSITIONS			
2025-02-14	REVIEW RECORD FOR PHASE 1, DRAFT OUTLINE POSITION	1.5	359.00	538.50
2025-02-17	DEVELOP AND DRAFT SUBMISSIONS	7.5	359.00	2,692.50
2025-02-18	REVIEW, REFINE AND SUBMIT	1.5	359.00	538.50
	DISBURSEMENTS			
2024-09-12	HOTEL ACCOMMODATION FPR SEPT 9-12 (NET OF HST)	3	200.00	600.00
2024-09-12	PARKING AT HOTEL SEPT 9-12	3	39.82	119.46
2024-09-12	MILEAGE RETURN (280KM)		99.12	99.12
	HST on Sales		13.00%	14,224.09

GST/HST No. 820292415

VIA RESS

June 12, 2025

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

RE: EB-2024-0111 – EGI Rebasing Phase 2 - FRPO Request for Cost Award

Introduction

We are writing on behalf of the Federation of Rental-housing Providers of Ontario in support of our requested cost claim.

This Proceeding was the second Phase of the Rebasing Process for the Merged company, Enbridge Gas Inc. (EGI). Given the substantive changes to the utility, its process and especially its storage operations over the more than 10 years since the last rebasing, there was a significant need for discovery and our own analysis to assess the application and the implications to ratepayers. We highlight three aspects that FRPO invested a significant amount of time to understand and develop workable proposals for the purposes of settlement and assist the Board's understanding:

Allocations of Storage Capital Investments Between the Utility and Non-utility

As a significant participant in the proceedings that culminated in EB-2011-0038 recoveries by ratepayers ordered by the Board, FRPO worked with other parties to advocate for the requirement for Union Gas to provide annual Capital Continuity reports in the last rebasing proceeding.¹

During the deferred rebasing period, we were vigilant in requesting the annual provision of these reports as directed by the Board.² During the deferred rebasing period, each of the legacy utilities and eventually the merged utility added tens of millions of dollars of capital to the storage plant accounts allocated in large part to the utility as opposed to the non-utility. Yet, the capability to provide storage services from the non-utility increased substantially over time. While FRPO sought understanding of the principles behind the allocations in many of the ratemaking proceedings, the inclusion in rate base was not at issue until this proceeding.

¹ EB-2011-0210 Decision and Order, pg. 78

² Ibid, pg. 79

Our pursuit of understanding extended to the further integration of the storage of the legacy utilities' operations with Dawn to Corunna pipeline project.³ While there was discovery on the effect of the pipeline on the utility and non-utility businesses of the merged company, the Board deferred determination of cost allocation to the rebasing proceeding. Given the scope of issues, the Board approved a phasing of the issues associated with rebasing with the subject allocation being part of Phase 2.

With the assistance of other intervenors, we were able to review and evaluate the history of these investments to establish different perspectives on the cost allocation which we shared with others. Through negotiations with EGI, we were able to agree to a shift in the allocation of capital resulting in a reduction of the revenue requirement associated with storage related items of \$8.3M annually.⁴ Further, the agreement altered the proposed allocation approach for 2024 and future years.⁵

Risk Management, Load Balancing Alternatives and Market-based Storage

Prior to the merging of the utilities, FRPO had pursued limiting legacy Enbridge Gas Distribution's purchases of market-based storage by seeking market available alternatives such as fixed gas purchases delivered at Dawn during the winter.⁶ With the merging of the companies, we pursued EGI's use of these market available alternatives. In this rebasing proceeding, we strived to use evidence elicited in discovery to assist parties understanding of the value of these alternatives in a utility's load balancing portfolio.

Our discussions with EGI altered the proposed approach to load balancing as outlined in the Settlement proposal. While the agreement does not define specific savings, the resulting agreements will contribute to a more cost effective, diversified, risk-adjusted approach to load balancing.⁷ Further, our understanding with EGI will create more transparency in relation to the cost of load balancing for ratepayers.⁸

Collaboration with Others to Navigate Complex, Inter-related Issues

As expected by the Board, FRPO worked closely with other ratepayer representatives to develop approaches and proposals to evolve the pre-filed proposals in the application. Given the 21 participating parties and 27 issues, we were able to establish, with EGI, a comprehensive proposal that eliminated all but three of the issues and is estimated to save ratepayers over \$0.5B⁹ over the term of the agreement. This effort included dozens of interrogatories, four days of technical conference and ten days of settlement conference with many days, evenings and

³ EB-2022-0086

⁴ Exhibit N, Tab 1, Schedule 1, pg. 12, Table 1 net of Sustain Adjustment

⁵ Ibid, pg. 25-26

⁶ EB-2017-0086 Exhibit N1, Tab 1, Schedule 1, pg. 15

⁷ Exhibit N, Tab 1, Schedule 1, pg. 23-24, 27

⁸ Ibid, pg.26-27

⁹ Ibid., pg. 13, Table 2

weekends devoted to digesting the discovery responses and analysis to promote proposal generation. While we communicated and collaborated across all sectors of intervenors, we would like to thank Mark Rubenstein of SEC for his leadership in driving consensus and Lawrie Gluck of CCC for his analytical collaboration and generation of helpful perspectives.

Conclusion

FRPO is appreciative of its opportunity to assist the Board and serve its ratepaying members. We trust that the Board will see merit in our contribution to efficient outcomes that serve the public interest. As such, FRPO respectfully seeks recovery of its reasonably incurred costs as documented in its attached invoice.

All of Which is Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. EGIRegulatoryProceedings – EGI

Receipt

Hotels.com itinerary: 7205*****

Purchase date: Sept 5, 2024

Booking details

Avalon Suites Yorkville

155 Yorkville Avenue, Toronto, ON, M5R 1C4 Canada

Check-in: Sept 9, 2024

Check-out: Sept 12, 2024

1 room x 3 nights

Comfort Condo, 1 Bedroom

Booked for: Dwayne

Payment details

Room price

Mon, Sept 9	CA \$220.02
Tue, Sept 10	CA \$208.16
Wed, Sept 11	CA \$301.71
Taxes & fees	CA \$144.37

Total

CA \$874.26

Paid

[AmericanExpress 1003]

Member's price: 15%

Prices shown after CA \$128.81 savings

From: Avalon Suites
To: drquinn@rogers.com
Subject: Confirm your CA\$135.00 payment
Date: September 7, 2024 9:14:56 PM



Confirm your payment

Please confirm your CA\$135.00 payment. Your bank requires this security measure for your card ending with ****1003

Details

Amount: CA\$135.00

Description: Parking | 2020 Dwayne Quinn| September 9-12, 2024

Request ID: laqd9N

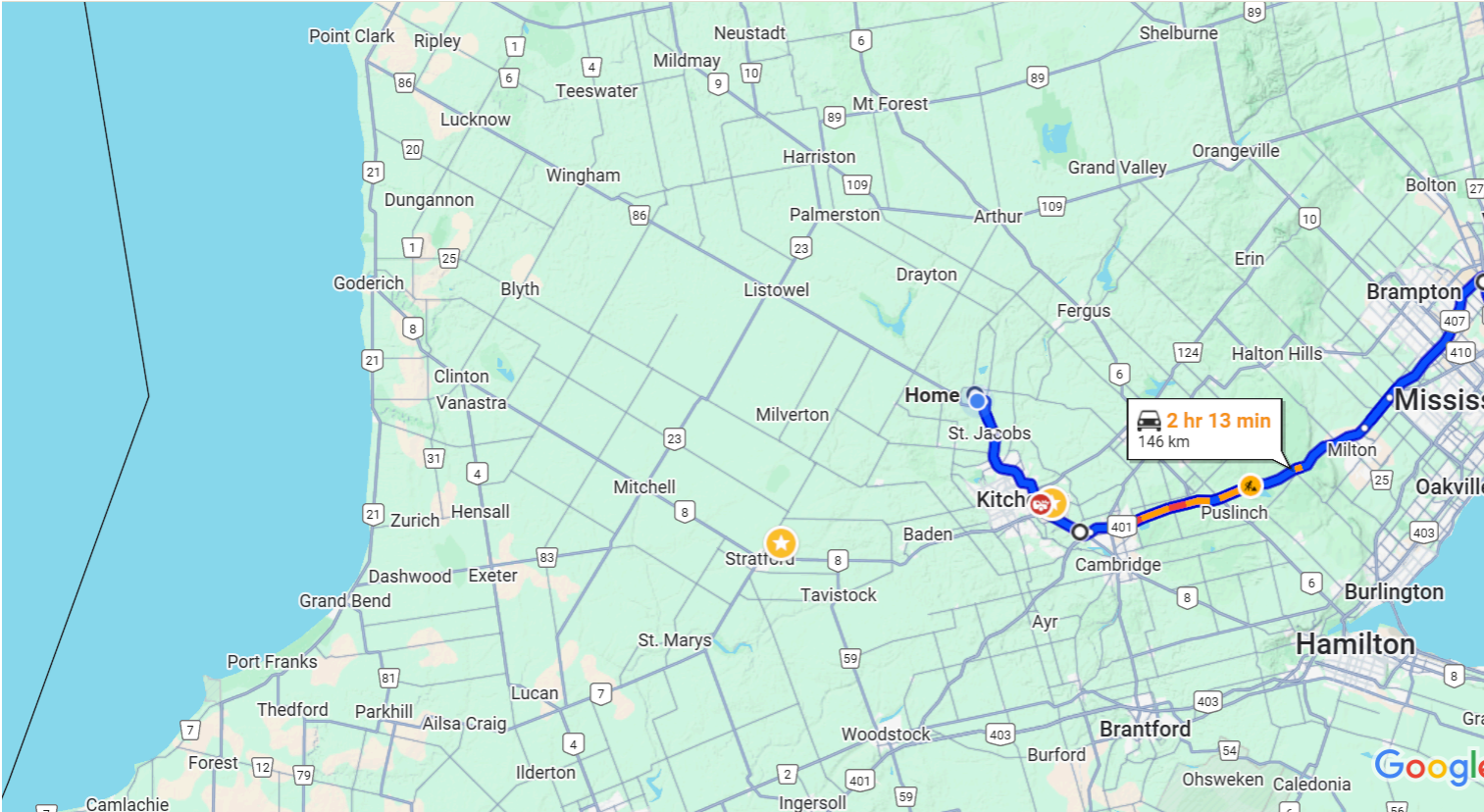
Status: Confirmation Required

Confirm Payment

☐ This process is safe, secure and easy

If you cannot access this link, copy and paste the entire URL into your browser:
<https://app.chargeautomation.com/securelink/7c02f1f224>

130 Muscovey Dr to Avalon Suites Yorkville



Imagery ©2025 , Map data



via ON-401 E

2 hr 13 min

1 hr 38 min without traffic

146 km

⚠ This route has tolls.

Explore nearby Avalon Suites Yorkville