

VIA OEB PORTAL

July 4, 2025

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

**RE: EB-2025-0073 – Mississauga Reinforcement Project
FRPO Request for Intervention – Response to EGI Objection**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Enbridge Gas Inc. (EGI) objection to our Request for Intervention in the Leave to Construct proceeding for the Mississauga Reinforcement.

EGI asserts that the Board should deny our request as we have failed to demonstrate any substantial interest. As Rule 22.02 states:

“...A person has a substantial interest if they have a material interest that is within the scope of the proceeding; for example, a person that: (i) primarily represents the direct interests of consumers (e.g., ratepayers) in relation to services that are regulated by the OEB;...”

FRPO members are ratepayers which meets the Rule 22 criteria.

FRPO has assisted the Board in several facilities applications as the cost consequences impact our members. Our initial review of the application focused on evidence pertaining to facilities and alternatives. As has been the case recently, there is limited evidence regarding the infrastructure in the vicinity of the proposed facilities and no information on system pressure before or after the incremental load is simulated to test adequacy. Our intent in intervening was to test the evidence in terms of facilities alternatives.

However, EGI’s letter goes on to say *“There will be no impacts to the private sector housing service providers and property managers that FRPO represents as the project is fully supported... and will not result in additional costs borne by existing ratepayers.*

In our initial assessment that focused on the facilities aspect, we did not do a thorough review of the contracts and the economics to assess the potential ratepayer risk, including stranded asset risk. A more thorough review of the economics and the contracts provides some comfort as it appears that the capital requirements are backstopped by graduated financial assurances which mitigate the risk of these facilities on current ratepayers.

While we continue to have concerns over the perpetual dearth of evidence to evaluate the appropriateness of facilities and alternatives, for this application, we can acknowledge that ratepayers seem to be protected. Given our respect for the Board and other on-going proceedings, FRPO will respectfully withdraw its request for intervention to focus on opportunities to assist with other proceedings.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.