

DR QUINN & ASSOCIATES LTD.

VIA RESS & EMAIL

September 3, 2025

Ontario Energy Board

Attn: Mr. Ritchie Murray, Acting OEB Registrar

P.O. Box 2319

27th Floor, 2300 Yonge Street

Toronto ON M4P 1E4

RE: EB-2024-0198 – EGI DSM Plan – 2026 Rollover - FRPO Submission

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in accordance with the Board's Procedural Order No. 6 regarding the issue of 2026 Rollover of EGI's current DSM Plan. Initially, we were focused on the evolution of the DSM Plan detailed in the EGI's Application for 2026-2030. With the narrowing of the scope of the proceeding associated with the removal of the Federal Carbon Charge (FCC), FRPO stayed engaged with the process to preserve our rights under the new scope.

Given the limited change to the Commercial program impacting delivery of DSM to multi-unit buildings, we are still concerned with the efficacy of a rolled over program without the FCC. However, we appreciate the value of continuity of programming. FRPO benefited from an early draft of the submissions of the School Energy Coalition (SEC). Respecting SEC's considered and comprehensive submissions on the narrow remaining issues, we support and adopt their recommendations with their underlying rationale. Accepting the value of program continuity, we believe SEC's recommendations would enhance DSM outcomes in the public interest.

FRPO's only additional submission would be that the Board would direct EGI to work with the IESO to expand the one window approach to their Commercial programs in their new 2027 Plan. Our experience in working with EGI and Toronto Hydro ten years ago in the expansion of Low-income DSM programming for privately-owned multi-unit buildings provided evidence of the efficacy of reviewing energy savings holistically. In our view, with the introduction of one window in 2025, EGI ought to be able to expand this approach for the benefit of multi-unit residential buildings.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn

Principal

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c. EGIRegulatoryProceedings – EGI, M. Bell – Staff, Interested Parties