

VIA RESS & EMAIL

November 15, 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 & Rollover – FRPO Cost Comments

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) to provide clarity regarding our cost submission.

In the Board’s Procedural Order No. 1¹, the Board outlined expectations for specific intervenor collaboration in the DSM proceeding. Specific to FRPO, the Board directed that we collaborate with Housing Services Corporation (HSC) in our respective interventions. Given the newness of the relationship and expectations from the Board, we spent some initial time considering the implications, responding to the Board's direction² and eventually meeting with HSC to share perspectives on the application for areas of commonality or potential difference.

Procedural Order No. 1 also included a stipulation that:

“these intervenors will be expected to report on how they coordinated their efforts, and intervenors’ cost awards could be limited to the equivalent of one intervenor for each category”

In an effort to be responsive to this stipulation, FRPO tracked the time associated with the direction to collaborate with HSC for this purpose and has submitted the resulting 5 hours under the category of Review Procedural Documents in our cost claim (given a lack of a better category). To be clear, from our experience, the opportunity to understand another organization who provides multi-unit residential housing and hearing their perspectives over managing energy costs was helpful to our understanding of the DSM application more holistically. We appreciate the investment of time provided by HSC’s representative.

¹ po1_EGI_2026-2030_DSM_20250304_esigned

² FRPO_SUB_EGI_DSM_Resp_PO1_20250310

However, with respect to the Board's desire for regulatory efficiency, and we understand that, in this situation, FRPO may be an anomaly but, this collaboration would not allow for any reductions in cost awards as HSC is not eligible for cost awards. In fact, in the investment of time FRPO has made to establish relationship and work collaboratively with HSC, these hours are incremental to what would normally be our investment in the normal review, discovery and submissions to the Board.

Perhaps, over time in working collaboratively, there may be room for improved efficiency. But the condensed nature of the scope of the proceeding to a limited technical conference with no oral hearing. In our view, in a full proceeding, there would be more time invested, if required, to have one representative at the technical conference and oral hearing who was completely versed in the discovery needs of the collaborating entity. Again, in this specific collaboration, there are no cost award savings from HSC given the nature of their organization.

We trust that this feedback may not be of great assistance to Board staff in the stated goals contained in Procedural Order No. 1 due to the unique aspects of our directed collaborator. Nonetheless, FRPO will, with the Board's leave, continue in its pursuit to assist the Board with its perspectives on gas utility applications and generic regulatory matters.

Respectfully Submitted on Behalf of FRPO,



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- M. Bell – Staff
- M. Parry – HSC
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