

VIA RESS

February 5, 2026

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

RE: EB-2025-0306 EGI LTC Lanark/Balderson - FRPO Response

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the EGI Letter on Intervention Requests for EB-2025-0306 filed January 30, 2026¹. While EGI “*is not formally objecting to FRPO’s intervention in this proceeding*”², this letter makes allegations about our conduct about which EGI knows better. We believe it is in the interest of the Board and our members to address these allegations and to request approval of intervention and cost award without presumptive limitations submitted by EGI.

FRPO was NOT Disrespecting the Rules

EGI cites that it was not aware of our intervention until it was posted on the OEB website. FRPO had previously believed that the OEB’s RESS system provided submitted documents to the Applicant. As shown in the inserted image below, the submission page includes the field “Organization directed to (Other than Applicant or OEB).”

PIVOTAL SUBMIT SUPPORTING DOCUMENTS

1. APPLICANT

APPLICANT OR OEB*

BOARD FILE NO.*

2. SUBMITTER CONTACT DETAILS

PRIMARY CONTACT NAME

CONFIRMATION EMAIL ADDRESS* drquinn@rogers.com

ARE YOU SUBMITTING DOCUMENTATION AS A_*?

DOCUMENT TYPE*

ORGANIZATION REPRESENTED (I.E. INTERVENOR)

ORGANIZATION DIRECTED TO (OTHER THAN APPLICANT OR OEB)

¹ EGI_EB-2025-0306_Intervention_Response_01302026,
<https://www.rds.oeb.ca/CMWebDrawer/Record/931668/File/document>

² Ibid, pg.4

Our misunderstanding regarding this issue was known to EGI through contemporary correspondence about another proceeding. Two days before the submission of its asserted concerns about not serving EGI with a copy, EGI emailed us to ask for a copy of our confidential IR's in another proceeding. As shown in the attached exchange of emails (see Attachment 1), we were of the understanding that the RESS system provided the Applicant a copy of the documentation. Due to the confidential nature of the IR's in that proceeding, we did not send those IR's with the non-confidential ones in our distribution to EGI and others.

Nonetheless, EGI has brought forward this concern and asked the Board to weigh “*the potential impact on regulatory efficiency should additional oversights of the Rules occur.*”³ In our view, if EGI's true concern was regulatory efficiency, they would not have submitted this allegation.

FRPO Would be Striving to Ensure Proper Evidentiary Basis for Pipe Sizing

In another assertion, EGI claims that our intervention request is vague on the issues as it only specified the proposed sizing. However, EGI then goes on to state that we have raised the project sizing issue in other leave to construct proceedings but in **one** specific case **of the dozens in which we have been active (our emphasis)**, our costs were found to be “excessive”. EGI goes on to request the Board instruct us to scale the intervention in line with the narrow scope.

In order of EGI's assertions:

- FRPO is seeking evidence for the testing and justification of pipe sizing

As we have stated in past interventions and proceedings⁴, in our view, the evidence submitted does not provide sufficient data on hourly demand and location of that demand to test the proposed pipe sizing. While we have advanced that concern as our primary interest other aspects such as the resulting risk to ratepayers at the end of the primary term is of concern to our members and we trust the Board.

- The referenced case was a complex replacement project

Unlike the community expansion project in this proceeding, the project referenced by EGI was the St. Laurent project.⁵ What was not mentioned was that this was the second proceeding for that same project wherein FRPO assisted the Board from a technical perspective when that project was rejected in the primary proceeding.⁶

³ Ibid, pg.4

⁴ For example: FRPO_INTRV REQ_KAWARTHA_20230731

⁵ EB-2024-0200

⁶ EB-2020-0293

Further, in another LTC proceeding, based on our pursuit and elicitation of data regarding pipe sizing, the Board approved a smaller pipe size than EGI proposed.⁷

- FRPO strives to assist the Board appropriately

FRPO respects that our opportunity to assist the Board and receive a cost award is contingent on our respect for the public interest. While our initial inquiry will be focused on enhancing the record with data associated with pipe sizing, there may be other matters that arise from evidence adduced and we respectfully submit that we should not be constrained only to the issue of the size of the proposed pipe.

We trust that this additional information is helpful to the Board in its consideration of our intervention.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

⁷ dec_ord_EGI Windsor LTC_20200401

ATTACHMENT 1

EB-2025-0306 EGI LTC Lanark/Balderson

FRPO REPLY EGI

REFERENCED FRPO/EGI EMAIL EXCHANGE JAN. 26, 2026

From: [Richard Wathy](#)
To: drquinn@rogers.com
Cc: [Bonnie Adams](#)
Subject: RE: [External] RE: EB-2025-0155 Confidential IRs
Date: January 26, 2026 12:18:09 PM

Thank you.

From: drquinn@rogers.com <drquinn@rogers.com>
Sent: Monday, January 26, 2026 12:09 PM
To: Richard Wathy <Richard.Wathy@enbridge.com>
Cc: Bonnie Adams <Bonnie.Adams@enbridge.com>
Subject: [External] RE: EB-2025-0155 Confidential IRs

CAUTION! EXTERNAL SENDER

Were you expecting this email? TAKE A CLOSER LOOK. Is the sender legitimate? DO NOT click links or open attachments unless you are 100% sure that the email is safe. This email was sent from drquinn@rogers.com.

Sorry I thought that the RESS system would send a copy to Enbridge as part of the document submission

I have provided the word copy also.

Please let me know if you have any questions

Dwayne Quinn
Principal
DR QUINN & ASSOCIATES LTD.
519-500-1022

From: Richard Wathy <Richard.Wathy@enbridge.com>
Sent: January 26, 2026 10:47 AM
To: Dwayne Quinn <drquinn@rogers.com>
Cc: Bonnie Adams <Bonnie.Adams@enbridge.com>
Subject: FW: EB-2025-0155 Confidential IRs

Good morning Dwayne,

Can you please provide Enbridge with your confidential IR? We were not in receipt of it.

Thanks,
Richard

From: Catherine Nguyen <Catherine.Nguyen@oeb.ca>
Sent: Monday, January 26, 2026 10:38 AM
To: Richard Wathy <Richard.Wathy@enbridge.com>
Cc: Bonnie Adams <Bonnie.Adams@enbridge.com>
Subject: [External Approved] Re: EB-2025-0155 Confidential IRs

EXTERNAL APPROVED: PLEASE PROCEED AND USE GOOD JUDGMENT.

This email has originated from outside the organization with a vendor approved to send communications to our workforce.

Morning Richard,

Yes there was a confidential IR that was filed by FRPO which should have been served on Enbridge. Can you please reach out to FRPO if you haven't received it?

From: Richard Wathy <Richard.Wathy@enbridge.com>
Sent: Monday, January 26, 2026 9:03 AM
To: Catherine Nguyen <Catherine.Nguyen@oeb.ca>
Cc: Bonnie Adams <bonnie.adams@enbridge.com>
Subject: EB-2025-0155 Confidential IRs

CAUTION EXTERNAL EMAIL: This email originated from outside of the OEB email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Catherine,

Just wanted to reach out and see if any confidential IRs have been submitted. We have not received anything from FRPO or SEC in this regard. They were the only two parties who signed the declaration.

Thanks,
Richard

Richard Wathy, CPA, CA (he/him)
Technical Manager, Regulatory Applications

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