

VIA E-MAIL

February 17, 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-2025-0295 – EGI 2027-30 DSM Plan Application

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in regard to the Enbridge Gas Inc. (“EGI”) dated in the matter of the EGI’s 2027-30 DSM Plan Application. Ratepayer-funded DSM programs have been provided by natural gas utilities for approximately three decades with the utilities being the sole administrator with performance incentives available.

FRPO is Ontario’s leading advocate for quality rental housing, representing over 800 private owners and managers who supply over 350,000 rental suites across the province. Our members believe strongly that the rental-housing sector is best served by a competitive marketplace that offers choice and affordability in the provision of energy services. As a not-for-profit organization, FRPO does not have other funding sources to ensure experienced representation to participate in and assist the Board with these regulatory proceedings. FRPO has previously assisted the Board in other matters while collaborating with other intervenors and has been awarded costs by the Board. Therefore, FRPO would respectfully request a determination of eligibility for cost award in this proceeding.

ISSUES

EGI has submitted an application under Section 36(1) of the Ontario Energy Board Act, 1998, for order or orders approving the DSM application and associated costs starting January 1, 2027. The rate impacts and approved services from these proposed changes affect FRPO members. As such, FRPO respectfully requests involvement in all aspects of the proceeding.

FRPO understands the challenges associated with the balancing of social responsibility to reduce carbon emissions and the cost to do so. This balancing requires informed consideration of the multiple approaches, their efficacy and cost effectiveness. We will be striving to understand EGI’s approach with attendant impact on our members.

EGI's application in the most recent proceeding was curtailed with the focus on expediting the 2026 program approval given the government's setting the Federal Carbon Charge to zero. Prior to that occurrence, the Board had directed FRPO to collaborate with Housing Services Corporation (HSC), amongst other collaborations, in an effort to achieve regulatory efficiency. As noted to staff in their review, given the mandate and nature of HSC, they are not eligible for cost awards. As result, FRPO's requested award was higher due to additional time spent collaborating on a very small scale application. If directed to collaborate with HSC to minimize representation, to the extent that this proceeding includes more components, in our view, our time spent and requested cost award will have even greater additional incremental costs.

REPRESENTATION

If the intervention requested is granted, then FRPO asks that further communications with respect to this matter be sent to the following:

Mr. Dwayne R. Quinn
DR QUINN & ASSOCIATES LTD.
39 Gerber Meadows Dr.,
Wellesley, Ontario
NoB 2To
Phone: (519) 500-1022
Email: drquinn@rogers.com

Thank you for your consideration of this request.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. EGIRegulatoryProceedings – EGI
M. Bell, L. Murray - Staff