

VIA RESS

May 29, 2026

Ontario Energy Board  
Attn: R. Murray, OEB Registrar  
P.O. Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto ON M4P 1E4

**RE: EB-2025-0064 EGI Rebasing Phase 3  
FRPO Response to EGI Submission on Cost Award Requests**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in accordance with Procedural Order No. 6 issued April 28<sup>th</sup> and Enbridge Gas Inc (EGI) Submissions on Cost Claims filed May 22, 2026. Given EGI's direct knowledge of FRPO's contribution to the process, we are disappointed that EGI's observation attempts to single out our lead role in discovery in this complex proceeding. For the reasons below, FRPO respectfully requests full reimbursement of its reasonably incurred costs.

FRPO's Broad Role in Gas Applications

As the Board will be aware, FRPO does not intervene in electric LDC proceedings. This focus on natural gas proceedings stems from our demonstrated ability to assist the board with many aspects of natural gas utility business and operations. Our principal regulatory consultant, Mr. Quinn, spent the first two decades of his career in natural gas engineering, facilities planning and design ultimately overseeing the utility including natural gas commodity procurement as well as transportation and storage contracting. In his role as director of the natural gas utility for the city of Kitchener, he was also responsible for cost allocation and rate making for the utility.

In this proceeding, EGI's application was seeking novel approaches to the allocation of cost and rate making coupled with harmonization of rates across their large service territory. Given these complexities, FRPO desired to test the evidentiary basis for the proposals of the utility as, from the outset, we were very concerned about one rate for the entire service territory especially for Gas Supply related costs. This meant asking questions across almost all exhibits in the pre-filed evidence. The resulting interrogatories were approximately three times the number filed by any other intervenor. As an example, FRPO asked ten interrogatories on Exhibit 8, Tab 2, Schedule 2 (Gas Supply Commodity and Transportation Charges) more than double all other interrogatories combined on that schedule of evidence. In addition, we needed to enhance the collective understanding of our major issues through the Technical Conference. Working directly with the School Energy Coalition and the Consumer's Council of Canada,<sup>1</sup> we wanted to ensure that we had a comprehensive record for

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<sup>1</sup> LPMA\_Cost Claim\_EGI Rates Rebasing Ph 3\_20260506 notes our leadership and collaboration with SEC and CCC

the prospect of settlement and/or a potential hearing. As a result, our discovery hours were higher than other intervenors.

### Intervenor Efforts were Beneficial to the Public Interest

While we cannot provide details of the settlement conference, our collaborative efforts including EGI produced the ultimate settlement agreement that did not include franchise wide rates for commodity, transportation and storage. In our view, this result produced greater cost causality than a single rate, was achieved efficiently and was of assistance to the Board in creating a balance between the convergence of rates and the rate shock to the customer without the need for an oral hearing. We would like to commend all parties including EGI for this result.

This sense of collaboration seems short lived though with EGI noting the cumulative intervenor requests for cost award was \$1.1 million and highlighting our discovery and IGUA consultant costs. We believe that it is notable that the resulting settlement agreement did not cite evidence provided by Christensen Associates (CA) in support of EGI's proposals. The costs for CA engagement are found in the confidential version of Exhibit I.8.2-SEC-14. While it is impossible for one to discern the cumulative resulting costs accurately, the various agreements and continuing engagement of CA by EGI had the potential [REDACTED] the interests of the customers who are ultimately paying the resulting rates. We draw the board's attention to these costs given the commitments made in its report to the Minister.<sup>2</sup>

### Conclusion

FRPO respects its role in assisting the Board while representing ratepayer interests including its members. In this proceeding, we have contributed diligently, judiciously and collaboratively to milestone agreement that has been approved by the Board. As a result, FRPO requests complete reimbursement for our reasonably incurred costs.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. R. Stevenson, EGI Regulatory Proceedings  
C. Nguyen, M. Millar, I. Richler - Staff  
Interested Parties

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<sup>2</sup> OEB Report to Minister - Intervenors and Regulatory Efficiency Report - Sept 27, 2024, page 10, point 6.