

VIA RESS

May 29, 2026

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

RE: EB-2026-0009 - FRPO Comments on Issues List

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in accordance with Procedural Order No. 1 issued May 14th.

FRPO respects that the Board's initial notification identified selected issues from the Model Franchise Agreement (MFA). However, in our view, a lot has changed since the approval of the MFA more than 20 years ago. One component is the Board's expectation that the utility will do Integrated Resource Planning (IRP) for facilities installations including replacements. At the time of the original installation, those sizing the pipeline needing relocation in many of these potential replacements could not have foreseen how a municipality would develop. Therefore, it is conceivable that by using IRP, the potential size of the replacement pipe could be reduced by incurring compensating additional costs through a better allocation of facility spend to serve the customers. We believe that including an issue in section 12 that outlines cost sharing would be appropriate.

We respectfully submit for the Board's consideration an issue that identifies a further clarification in the sub-bullets of Section 12 c).

- Is it appropriate to include additional descriptors to the sub-categories of Section 12c) of the MFA for the inclusion of IRP costs to reduce the cost of the overall cost of relocating a pipe.

We thank the Board in advance for its consideration of this addition to the issues list in this proceeding.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. N. Plummer, S. Pope, T. Hobbins - Staff
Interested Parties