

VIA E-MAIL

September 8, 2026

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

**RE: EB-2026-0108 EGI 2025 Deferral & Variation Account Disposition and
Earnings Sharing
FRPO Request for Intervenor Status and Eligibility for Cost Award**

REQUEST & SUPPORT

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to the Notice provided by Enbridge Gas Inc. (EGI) on August 26th. The resulting rates impact on the members of the FRPO.

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 and has been awarded costs by the Board. Therefore, FRPO would respectfully request a determination of eligibility for cost award in this proceeding.

FRPO has participated in numerous natural gas proceedings and assisted the Board over the last 18 years. FRPO represents the direct interest of its members who are impacted by changes to the regulated rates of Enbridge Gas. Therefore, FRPO respectfully requests involvement in all aspects of the review of this Application.

ISSUES & REQUESTED PROCEDURAL CONSIDERATIONS

Enbridge Gas requests that this proceeding be heard in writing. The Notice from the Board asks for those seeking involvement to explain why the Board would consider providing for a hearing type other than written. In our view, this application raises issues, some for the first time, which would benefit from the provision of oral communication afforded by the provision of a technical and/or settlement conference(s).

In support of our request, FRPO offers the following issues with some context for the Board's consideration:

Earnings Sharing Determination for EGI after the Full Cost Integration of Rebasing

The first phase 2024 Rebasing Proceeding¹ established fully integrated costs of the legacy Enbridge Gas Distribution Inc. and Union Gas Ltd. In the second phase, the Board determined the appropriate methodology and parameters for an earnings sharing mechanism.² This proceeding provides the first opportunity for ratepayers and the Board to review EGI's implementation of the outcomes of these proceedings.

Interim 2024 Gas Cost Balances Subject to Final Determination

In the 2024 Deferral and Variance Account Disposition and Earnings Sharing, we were unable to reconcile the treatment of Upstream Transportation Optimization Variance Account and the Unabsorbed Demand Costs Variance Accounts. The OEB approved interim disposition of the balances allowing for parties to ask questions in the next DVA proceeding. Our inability to reconcile the treatment of cost was, in our view, inhibited by direct dialogue to achieve understanding.

Initial Opportunity to Test EGI's Approach to Load Balancing with Reduced Storage

As part of the negotiated settlement approved by the Board in the second phase of rebasing,³ EGI to manage a reduction of market-based storage from 26 PJ to 18 PJ. Further EGI committed to manage its load balancing requirements in a manner that it deemed appropriate including the consideration of the use of forward contracts while agreeing to explain and justify the prudence of its load balancing costs as part of the annual deferral and variance account disposition proceedings. This proceeding is the first such opportunity for ratepayers, staff and the Board to review this approach to load balancing.

While our issue identification is not exhaustive, we trust that the Board will recognize the impact these and other issues can have on rate impacts to customers. FRPO has intentionally not described the substance of these issues to avoid positioning or argument at this time. Instead, we have only identified these major issues to support our request for the Board's consideration of the provision for procedural steps to allow testing of the evidence and informed submissions for the Board's determination. Specifically, FRPO respectfully request a Technical Conference following the generation of interrogatory responses and the further consideration of a Settlement Conference as an opportunity to narrow the issues for determination reducing the potential need for an Oral hearing.

¹ EB-2022-0200

² EB-2024-0111 DECISION ON SETTLEMENT PROPOSAL AND INTERIM RATE ORDER, Nov. 29, 2024, pg. 3-5

³ Ibid, pg. 6

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
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Thank you for your consideration of the above requests.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. EGIRegulatoryProceedings – EGI