

VIA E-MAIL

June 11, 2020

Ontario Energy Board  
Attn: Ms. Christine Long, Board Secretary  
P.O. Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto ON M4P 1E4

**RE: EB-2020-0133 – Consultation on the Deferral Account – Impacts Arising from CoViD-19  
FRPO Comments**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to the Board's June 4<sup>th</sup> letter in regard to this consultation.

We understand and respect that the Board has a legislated responsibility to ensure there is a proper balance of interests between utilities and their customers. That responsibility extends to providing direction or guidance as appropriate on rate matters in the public interest. The Board's establishment of deferral accounts to track variances is generally an appropriate step to ensure future evidence of the **need** for rate adjustments to maintain that balance and, potentially, the viability of the LDC.

However, as more detail on the nature and potential application of these accounts was provided through the May 14<sup>th</sup> initial draft issues list, the staff presentation of May 28<sup>th</sup> and the Board's June 4<sup>th</sup> letter, a fundamental concern arose: Was the purpose of these accounts to keep the utilities insulated from the effects of the pandemic while its customers of all segments are not? The June 4<sup>th</sup> request for input on the need for prior assurance of recoverability of these accounts including the given example of bad debt heightened this concern. What other segment of the economy is afforded this luxury?

During the stakeholder conference, we identified that our concerns resonated with other intervenors especially the Vulnerable Energy Consumers Coalition ("VECC"). Aligned with the expected regulatory efficiency of collaboration, we have reviewed the submissions of the ratepayer representatives who make many valuable submissions worthy of consideration. Primarily, we endorse and adopt the principled and economically rational submissions of VECC which align with our concerns in this matter.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. F. O'Connell – OEB  
Interested Parties – EB-2020-0133