

VIA RESS

May 10, 2022

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

**RE: EB-2022– EGI Dawn to Corunna Replacement Project
FRPO Request for Intervention**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Notice of Application issued April 14th for EB-2022-0086.

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.

ISSUES

EGI has requested Leave to Construct under Section 90 of the OEB Act to replace compression at the Corunna Compressor Station with an NPS 36 pipeline from Dawn. The application does not provide sufficient detailed analysis (e.g., simulation results, pressures) of alternatives in the application. Moreover, depending on some factors, the cost of compression is usually lower than the cost of pipelines for the same amount of gas delivery capability. FRPO would seek to explore a better understanding of the analysis of alternatives for which the company provided summary information. We attempted to get an additional information in Phase 2 of the 2022 Rates proceeding but were refused.¹

FRPO is concerned that a number of projects have advanced by EGI with limited or missing information regarding important aspects of the project. The separation of the leave to construct proceeding from the approval of the funding through ICM creates a need to obtain discovery at the earliest possible point or risk the utility refusing to provide information

¹ EB-2021-0148 EGI_IRR_20220121_FRPO.21

pertinent to the prudence of their desired approach². The rate impact of these projects, if approved, directly affect our members.

The Notice of Application provides that the EGI has requested a written hearing. While we do not oppose that request, we believe the best time for that determination would be after the initial round of discovery. Whatever the Board decides, we respectfully request the opportunity to be involved in all aspects of the proceeding that the Board deems necessary including manner of hearing.

REPRESENTATION

We apologize for filing our request, the day after the notice deadline. However, we did not receive the Notice and were advised by an intervenor colleague earlier today. 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.
130 Muscovy Drive,
Elmira, Ontario N3B 3B7
(CV attached)

Phone: (519) 500-1022
Email: drquinn@rogers.com

Thank you for your consideration of our request.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. A. Stiers, EGIRegulatoryProceedings – EGI

² EB-2020-0192 Letters Exchanged between FRPO seeking and EGI refusing information regarding pipe segment that was identified incorrectly in evidence, 20201214 and 20201215 and EB-2020-0181 Exhibit I.FRPO.31

Dwayne R. Quinn, P. Eng., MBA
DR QUINN & ASSOCIATES LTD.
drquinn@rogers.com
(519) 500-1022

FOCUS

Assisting organizations with proactive adaptation to legislative and regulatory evolution and resulting market developments. Identifying the organizations' needs and goals and using strategic insights into public policy evolution to develop strategic and tactical initiatives to address proactively the upcoming opportunities and challenges. As a professional engineer with a Master of Business Administration degree, I have over 30 years of utility experience including over 20 years influencing public policy and regulation; achieving personal credibility with governmental and regulatory bodies.

ACCOMPLISHMENTS

- Evolved a combined, traditional gas and water utility into a customer-sensitive organization delivering bottom line value to customers and owners
- Instituted Mutual Gains (Interest Based) Bargaining with labour union in 1999
- Directed market research of customers and owners to determine their desires for the natural gas utility in a deregulated environment
- Developed and implemented a direct purchase strategy to buy natural gas for the utility's customers
- Directed the branding of Kitchener Utilities as the Community-Owned Utility
- Re-contracted natural gas transportation and delivery agreements resulting in substantial savings
- Developed strategy to implement full cost recovery from water and wastewater systems receiving Council approval to represent the City at public hearings on the Draft Sustainable Water and Sewer Systems Act
- Implemented the principles of the Sustainable Water and Sewer Systems Act absent regulations resulting in two consecutive 18% water and wastewater rate increases with significant public acceptance
- Worked with the Ministry of the Environment, Ministry of Municipal Affairs and Public Infrastructure Renewal to evolve financial regulations to be more effective for municipal water utilities

RESULTS

- Customer understanding and appreciation for our service measured through Market Research
- Customer natural gas savings of over \$25 million in 7 years through implementation of direct purchase
- Incremental profits of over \$25 million dollars in same 7 years from the for-profit aspect of the natural gas utility while keeping customer rate increases below the rate of inflation
- Kitchener's water and wastewater utilities positioned to be fully financially sustainable
- Water and wastewater utilities across the province benefited from more effective financial planning regulations

BOTTOM LINE

I am a highly motivated and passionate professional who believes in service. My pursuit of the interests of those I serve is paramount. Success has been achieved by attaining a comprehensive understanding of the situation coupled with an ability to match stakeholders' interests with opportunities. Much of what was accomplished in Kitchener was unprecedented in public service.

ACADEMIC AND PROFESSIONAL

- Bachelor of Engineering Science (Chemical) - University of Western Ontario – 1985
- Association of Professional Engineers of Ontario – 1987
- Master of Business Administration – Wilfrid Laurier University – 1997
- Completed courses in Master of Laws in Energy and Infrastructure – Osgoode PD - 2012-2014
- Certificate in Adjudication for Administrative Agencies, Boards & Tribunals – SOAR - 2014

Dwayne R. Quinn, P. Eng., MBA

EXPERIENCE

Union Gas Limited – 1985-92

Three successive positions of increasing responsibility covering Facilities Planning, Operations Engineering and Plant Construction. Improved simulation modeling techniques, pressure station design, workflow, performance, and customer service.

Babcock & Wilcox – Project Management – 1993-1994

Project management on a \$200 million steam generator replacement project.

City of Kitchener, Utilities Division – Director – 1998-2007, Engineer – 1994-98

Management, operations, regulatory lead and strategic direction of a combined gas and water utility. Contributed to the strategic evolution of Utilities to meet the challenges of natural gas deregulation and the implementation of the Sustainable Water and Sewer Systems Act, 2002.

DR QUINN & ASSOCIATES LTD – Principal - 2008-present

Established an independent consulting company providing advisory services in the fields of energy and infrastructure to clients in the public and private sectors.

Federation of Rental-housing Providers of Ontario (FRPO) Regulatory Consultant representation at the Ontario Energy Board, 2008-present.

Ontario Greenhouse Vegetable Growers (OGVG) Regulatory Consultant representation at the Ontario Energy Board, 2013-2016.

Utilities Kingston Natural Gas Management Consultant. Advising on natural gas procurement and asset contracting strategies as well as cost allocation and ratemaking, 2008-present.

Heritage Gas Ltd Consultant on Issues of Natural Gas Market Evolution including Self-Supply Practices, Contracting and Utility Accounting, 2013-present.

Ontario Petroleum Institute (OPI) Regulatory Consultant on matters related to natural gas production and pricing in the Ontario market, 2021-present.

COMMITTEES, ASSOCIATIONS & REPRESENTATIONS

Ontario Natural Gas Association – Board of Directors 1999-2000

Contributed to the survival through evolution of the association for the benefit of its members

Ontario Energy Association – Board of Directors 2000-2001

Contributed to the design & implementation of business plan to evolve energy association to reflect changing market

Technical Standards and Safety Authority, Advisory Council 2000-2008

Contributed to the Authorities strategic direction of Ontario natural gas industry's safety regulator putting Public Safety First during deregulation of utility services

Ontario Energy Board – 1999-2007, 2008-present

Lead Kitchener Utilities regulatory representation including submission of written evidence and supporting testimony until 2007 and subsequently, regulatory consultant for FRPO and other stakeholders