

VIA RESS

July 16, 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 Areas of Inquiry for Technical Conference**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in response to the Board’s PO#2 issued July 12, 2022 directing parties to provide notice to EGI and parties of the topic areas for questioning.

FRPO thanks the Board for providing the additional opportunity for discovery in what is a complex project for which there is considerable technical considerations. While EGI did provide a significant amount of information in response to our and other parties interrogatories, many warrant additional understanding and consideration.

Our topic areas are:

- **Integration of CCS and Dawn:** Separation and integration of functionality for service delivery and impacts on the project and alternatives
- **Design Criteria Applied:** This would include not only design day criteria but operating performance and resiliency
- **Consideration of Opportunities to Phase-In Replacement:** Benefits and costs associated with up to 7 compressors replaced in the application vs. all seven compressors replaced expressed in IRR’s (SEC.13 and others).
- **Resulting Performance Capability and Utilization:** Facility design and installation is “lumpy” and we would like to understand how resulting utilization will be managed/allocated with non-utility (FRPO.24 and others)

To understand the company’s proposal and propositions, we will be seeking clarification of responses to many of the FRPO IRR’s along with some of staff and other parties (e.g., Staff.1, .6 &.9, ED.1 &.10, PP.5, SEC. 13, etc.).

Depending on the company’s composition of the panel(s), we will organize our inquiry in the topic areas. Subject matter that we respectfully request the company ensure is provided on the panel are witnesses that can speak to design and operation of variable speed compressors and the resulting functionality that could provide flexibility to meet CCS needs.

At this point, a time estimate is difficult but the best estimate we have would be 2-3 hours so we estimate 2.5hr which, of course, is dependent on the cooperation of the company witnesses.

Respectfully Submitted on Behalf of FRPO,

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Principal
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c. A. Stiers, EGIRegulatoryProceedings – EGI