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Reply To: Thomas Brett
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Our File No. 153667

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2015-0043: Rate Design for Electricity Commercial and Industrial Customers

Please find enclosed herewith BOMA's Comments on the Staff Report.

Yours truly,

FOGLER, RUBINOFF LLP



Thomas Brett

TB/dd

Encls.

cc: All Parties (*via email*)

Building Owners and Managers Association, Greater Toronto ("BOMA")

Comments on Staff Discussion Paper: "Rate Design for Commercial and Industrial Electricity Customers: Aligning the Interests of Customers and Distributors"

BOMA was pleased to provide its comments on this Staff Discussion Paper on May 27, 2016. Its fundamental position has not changed since then, although changes have continued to drive new technologies, new approaches, and new concerns in the electricity sector, which make the rationale for our 2016 position even more pressing now.

However, BOMA is concerned that the Staff Discussion Paper has not been revised since it was originally issued on March 31, 2016. BOMA does recognize that the restated objectives in the most recent covering letter, requesting more comments, are better than the original objectives, but the Staff Discussion Paper hasn't changed, and there is little linkage between the updated objectives and the out of date Staff Discussion Paper or its appendices.

In addition, the OEB has announced several related consultations that will also affect rate design for our member companies. Yet there is no updated roadmap for how all these separate initiatives will be integrated so that the sum of the results of each will maximize the benefits for customers, not create new problems for customers and utilities alike.

BOMA prefers that the Board develop an updated road map which addresses the excellent advice of its own Advisory Committee on Innovation, as well as the dynamic changes that have taken

place in the past three years. Then, with an updated roadmap, establish subject teams of stakeholders as a basis for consultation and comment.

Our members are not only customers, with interests and conditions very unlike large industrial customers, they also want to become electricity suppliers, recognizing the resilience that is inherent in local generation, as they increasingly face disruptions from climate related disasters. Our members are also addressing many changes to their business and natural environments, as well as client demands.

For these reasons, BOMA believes it is counterproductive to comment further on the specific proposed rate designs.