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Reply To: Albert M. Engel
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Our File No. 201952

VIA RESS AND EMAIL

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

Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2020-0066: Enbridge Gas Inc. – Voluntary Renewable Natural Gas Program – BOMA request for intervention and eligibility for cost award

1. The Building Owners and Managers Association ("BOMA") seeks intervenor status and cost award eligibility in the above noted proceeding.
2. BOMA is a frequent intervenor in Board proceedings.

Description of the Intervenor and its Membership

3. BOMA represents over 800 Ontario Property and Facility Owners, Managers, Developers, Leasing Agents, and Commercial Real Estate Professionals. Its members account for 80 per cent of all commercial and industrial real estate companies throughout Ontario. BOMA's members are large consumers of natural gas throughout the province, and are affected by any changes in Enbridge's rates and terms of services. BOMA's members have a high level of interest in RNG.
4. Over the years, BOMA has been active in protecting and advancing the interests of its members on such important policy issues as energy pricing and supply, property taxes, labour requirements, building materials and equipment regulations. BOMA continues to work at all levels of government providing a voice for Commercial Property owners throughout Ontario.
5. BOMA has been a major and constructive participant in numerous previous cases.

Interest of the Intervenor in the Proceeding and the Grounds for the Intervention

6. BOMA is particularly interested in the following aspects of the proceeding:
 - (a) Review of an early RNG facilitating proposal.
 - (b) The extent to which commercial, office, retail and institutional consumers may enroll in the Voluntary RNG Program;
 - (c) The extent to which the RNG obtained by Enbridge Gas using Program funds reduces the Company's Federal Carbon Charge obligations and how any variance between the Federal Carbon Charges remitted to the CRA and the amount charged to customers will be tracked in existing OEB-approved Federal Carbon Pricing Program customer-related variance accounts and flow to all customers subject to the Federal Carbon Charge;
 - (d) Whether the Voluntary RNG Program Application has addressed the five concerns expressed by the Board in its EB-2011-0242/EB-2011-0283 Decision;
 - (e) The marketing and communication strategy described in the Application;
 - (f) Impacts of the Voluntary RNG Program on relevant variance and deferral accounts; and
 - (g) Generally to represent the interests of commercial, office, retail and institutional consumers in this process.

Nature and Scope of the Intervenor's Intended Participation

7. BOMA intends to participate in all pre-hearing procedures, including such interrogatories, technical conferences, or settlement conference, as the Board may direct. It also intends to participate in any written or oral hearing for which the Board may provide.

Intention to Seek an Award of Costs

8. As a representative of a large sector of energy consumers throughout Ontario, the commercial, office, retail and institutional building owners and managers, BOMA seeks a cost award in this proceeding.

Addresses of Representatives

9. BOMA requests that further communications with respect to this matter be sent to the following representatives in electronic form only:

| | | |
|-----------------------|-----------------------|--------------------------|
| Thomas Brett, Partner | Albert Engel, Partner | Marion Fraser, President |
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BOMA respectfully requests your acceptance of this intervention request and confirmation that it will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel

AME/dd

cc: Brandon Ott, EGI (via email)
David Stevens, Aird & Berlis LLP (via email)
Marion Fraser, Fraser & Company (via email)
Bala Gnanam, BOMA (via email)