



Ms. **Kirsten Walli**
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

September 6, 2011

To: **Kirstin Walli**, Board Secretary

Re: **Letter of support for Union Gas's (Union) 2012-2014 Commercial/Industrial DSM programs**

In response to the OEB's request for stakeholder engagement¹ concerning Union Gas's 2012-2014 multi-year DSM plan we have prepared the following letter of support:

On behalf of BOMA Toronto's more than 800 influential commercial and real-estate members², we are pleased to provide this letter in support of Union's 2012-2014 DSM Plan³. In particular, our attention was on the Commercial and Industrial programs.

Support for Union Gas's 2012-2014 DSM Plan

Union's DSM activities have helped many of our members gain control of their utility use. This support includes funding for energy assessments, as well as directing investments into new and retrofitted energy efficiency equipment and technologies. The result has been both short term and long term natural gas savings for economic and environmental benefits to our members.

BOMA recognizes the value that Union's Building Optimization program offers, both in terms of the financial incentives that are necessary and as a 'catalyst' for sustainable change. The financial support provided by an incentive based on M³ saved, encourages customers to minimize consumption and rewards customers that are already demonstrating Energy Efficiency (EE).

In our view, DSM programs such as these have driven real progress in overcoming EE barriers. Ontario, like other jurisdictions, faces numerous barriers to EE. These barriers prevent optimization and Ontario from reaching its potential to improve economically and environmentally.

Importance of EE

The importance of energy efficiency has become a significant consideration to Ontarians. In our experience, Union's DSM programs have helped many building owners and managers benefit and increase their knowledge and insight on ways to identify building optimization opportunities. Equally, projects can be better prioritized to increase bill reductions. Union's programs and engineers have

played an integral role in helping BOMA members and building operators understand the value of energy efficiency, in terms of maintaining tenant comfort, improving indoor air quality, and lowering energy related operating costs. Furthermore, participation in Union's program workshops, newsletters and technology magazines, has increased member awareness of energy saving opportunities.

DSM to meet Ontario's 'Green' Objectives

Based on our experience in the commercial real estate sector, we believe many gas reduction and energy efficiency opportunities still exist. As described in BOMA BEST's 2009 report⁴ Ontario ranks 3rd out of 5 Canadian regions in Energy Scores. It is apparent from Ontario's ranking that there is room to improve.

BOMA strongly requests that the Board considers how Union's historical expertise and incentive mechanisms benefited natural gas customers in their review of Union's 2012-2014 multi-year plan.

In reviewing "2010, Canadian DSM Natural Gas Activities" report⁵, Ontario's DSM investment, compared to Manitoba appears modest, possibly too modest considering Ontario's 'Green' objectives.

BOMA is in support of Union's current 2012-2014 plan and Commercial and Industrial programs³ as presented at their Consultative on August 11th, 2011 and from the follow up phone conference held August 18th, 2011.

Union's plan is expected to have positive impacts on BOMA members, businesses and the province as a whole.

Conclusion

Thank you for your invitation to respond to Union Gas's 2012-2014 multi-year DSM plan.

BOMA Toronto has had the privilege of working for the past three years on Conservation and Demand Management (CDM) and we recognize the benefits as well as the challenges in implementing sustainable change.

Similar to CDM, DSM provides direct economic and environmental benefits to the province in meeting its green objectives.

It is for these reasons that BOMA continues supports Union's 2012-2014 DSM plan and its Commercial/Industrial programs.

Sincerely,

A handwritten signature in dark ink that reads "Chris Conway". The signature is written in a cursive, flowing style.

Chris Conway
President
BOMA Toronto

References

- 1) OEB, DSM Guidelines for Natural Gas Utilities, online access August 23, 2011: http://www.oeb.gov.on.ca/OEB/Documents/EB-2008-0346/DSM_Guidelines_for_Natural_Gas_Utilities_20110630.pdf
- 2) BOMA Toronto's main website, online access August 24, 2011: <http://www.bomatoronto.org/>
- 3) Union Gas's DSM multi-year presentation: **2011-08-15 UGL Consultative Meeting Aug 11.pdf**
- 4) BOMA BEST, 2010, Energy and Environmental report, online access August 24, 2011: http://www.bomacanada.ca/docs/BBEER_2010_ENG_TEXT_LRes2.pdf
- 5) IndEco, 2010, Canadian DSM Natural Gas Activities, online access August 24, 2011: <http://www.cga.ca/publications/documents/CanadianNaturalGasUtilitiesDSMActivities.pdf>

Consultations:

- 1) Enbridge/Union with OEB in attendance, initial DSM stakeholder engagement session held July 20th, 2011

- 2) Union Gas 2012-2014 DSM plan meeting 1 of 2 held August 11th, 2011

Document as a result of above meeting:

2011-08-15 Union Gas DSM Consultative Meeting MoM R3

- 3) Union Gas 2012-2014 DSM plan meeting 2 of 2 held August 18th, 2011

Documents as a result of above meeting:

2011-08-22 Union Gas DSM Consultative Meeting Final Meeting MoM R1

2011-08-23 Response to Union Gas's 2012-14 DSM plan

Documents available upon request from:

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