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December 18, 2017

Reply To: Thomas Brett  
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Our File No. 177169

**VIA RESS, EMAIL AND COURIER**

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

Attention: Kirsten Walli,  
Board Secretary

Dear Ms. Walli:

**Re: EPCOR Natural Gas, 2018 Cap and Trade Compliance Plan  
Board File No. EB-2017-0275**

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The Building Owners and Managers Association, Greater Toronto ("BOMA") seeks intervenor status and cost award eligibility in the above noted proceeding.

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 in the Greater Toronto Area and many others throughout Ontario. BOMA's members are large consumers of energy.

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 in the Greater Toronto Area and throughout Ontario.

BOMA has been a major and constructive participant in numerous previous natural gas rates and facilities cases. As a representative of a large sector of energy consumers in the Greater Toronto Area and throughout Ontario, the commercial and industrial building owners and generators,

BOMA seeks a cost award in this proceeding. Because of its constituency, it has a keen interest in customer specific reliability matters.

BOMA requests that further communications with respect to this matter be sent to the following parties:


Thomas Brett, Partner Fogler, Rubinoff LLP 77 King Street West Suite 3000 Toronto, Ontario M5K 1G8 Tel: (416) 941-8861 <u><a href="mailto:tbrett@foglers.com">tbrett@foglers.com</a></u>	Marion Fraser, President Fraser & Company 65 Harbour Square Suite 1005 Toronto, Ontario M5J 2L4 Tel: (416) 941-9729 <u><a href="mailto:marion.fraser@rogers.com">marion.fraser@rogers.com</a></u>
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BOMA prefers an oral hearing, given the importance of this case, the fact that the 2017 proceeding included a hearing, and the fact that the 2018 case will be more substantive than the 2017 case, which, because of the prevailing uncertainties, included only skeletal evidence.

BOMA respectfully requests your acceptance of this intervention and confirmation that it will be eligible for costs.

Yours truly,

**FOGLER, RUBINOFF LLP**



Thomas Brett

TB/dd

cc: Valerie Bennett, OEB (*via email*)  
Brian Lippold, EPCOR (*via email*)  
Richard J. King, Oslers (*via email*)  
Marion Fraser, Fraser & Company (*via email*)  
Bala Gnanam, BOMA (*via email*)