



Fogler, Rubinoff LLP  
Lawyers

77 King Street West  
Suite 3000, PO Box 95  
TD Centre North Tower  
Toronto, ON M5K 1G8  
t: 416.864.9700 | f: 416.941.8852  
foglers.com

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Reply To: Thomas Brett  
Direct Dial: 416.941.8861  
E-mail: tbrett@foglers.com  
Our File No. 174118

**VIA EMAIL, RESS AND COURIER**

Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, Ontario  
M4P 1E4

Attention: Kirsten Walli,  
Board Secretary

Dear Ms. Walli:

**Re: EB-2017-0127/0128 – DSM Mid-Term Review  
EB-2017-0224/0255 – Enbridge Gas Distribution Inc. and Union Gas Limited,  
2018 Cap and Trade Compliance Plans**

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I am writing the Board to convey BOMA's support for Kent Elson's request on behalf of Environmental Defense relating to the DSM Mid-Term Review and the Cap and Trade Compliance Plans Proceeding.

BOMA agrees that the gas utilities should be invited to propose incremental conservation driven by carbon cost considerations as part of the DSM Mid-Term Review. We also believe the DSM Mid-Term Review is an appropriate vehicle to consider these issues. This would ensure consistency, achieve efficiencies, and provide an appropriate timeline.

The utilities believe that carbon-cost-driven conservation should be implemented via the DSM Framework and have put forward several reasons for that. We also agree, if no direction is given to the utilities to put forward plans, a *de facto* decision is being made ruling out conservation to cost-effectively reduce customer carbon costs.

Yours truly,

**FOGLER, RUBINOFF LLP**

Thomas Brett  
TB/dd

CC: All Parties in EB-2017-0127/0128  
All Parties in EB-2017-0224/0255