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March 4, 2019

Reply To: Thomas Brett
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Our File No. 190437

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-2018-0300/0301: Enbridge Gas Inc., 2016 Disposition of DSM

Please find enclosed herewith BOMA's Written Submission.

Yours truly,

FOGLER, RUBINOFF LLP

Thomas Brett

TB/dd

Encls.

cc: All Parties (*via e-mail*)

EB-2018-0300
EB-2018-0301

ENBRIDGE GAS INC.

**Application to dispose of balances in certain deferral and variance accounts
related to the delivery of conservation programs in 2016**

**WRITTEN SUBMISSION OF
BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO
("BOMA")**

March 5, 2019

Tom Brett
Fogler, Rubinoff LLP
77 King Street West, Suite 3000
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Counsel for BOMA

BOMA agrees with the Enbridge Gas request that the proposed target adjusted 2016 DSM deferral and variance account balances be approved for disposition as filed. BOMA understands that the application of 2015 NTG Study findings to 2016 DSM results without their application to targets done by the evaluation contractor at the direction of Board Staff, is not consistent with the prior guidance provided by the Board which has been well documented by Enbridge Gas.

BOMA supports the company's request that the Board make the following findings, determinations and orders:

- For each of the EGD rate zones and Union rate zones, approve Enbridge Gas's audit-adjusted deferral and variance accounts balances for the DSMVA, DSMIDA and the LRAMVA, as outlined in EGD's and Union's respective Applications, and as summarized above;
- Approve Enbridge Gas's proposed amendments to the DSMVA accounting orders for the EGD rate zone and Union rate zones;
- Approve the roll-forward of \$2.822 million of 2016 DSM budget in the Union rate zones related to the DSM tracking and reporting system upgrade expenditures that occurred in 2017 and 2018;
- Approve the proposed allocation and disposition methodologies for the 2016 DSM deferral and variance account balances in the EGD rate zone and Union rate zones; and
- Provide direction related to:
 1. the timely completion of 2017 and 2018 EM&V activities;
 2. a more complete assessment of NTG in future studies; and

3. the appropriateness of an NTG Factor for the Large Volume program in the Union rate zones.

BOMA has suggested using Performance-Based Conservation as a more desirable framework for program design and evaluation with respect to commercial and institutional buildings as it uses metered data rather than a series of estimates and assumptions. This methodology has been developed in Ontario over the past decade and is now in growing use across Canada and in the United States, enabling wide-scale energy, water and greenhouse gas emissions reductions. The methodology uses progressively deeper utility data analytics, from annual to monthly to interval data, with the aim of:

- Enhancing customer engagement with evidence-based business cases for individual buildings and portfolios;
- Driving deeper savings through identification of high-potential buildings and measures; and
- Verifying actual savings and guiding continuous learning and improvement by means of ongoing monitoring and reporting of savings.

BOMA's submission to the Mid-Term Review (EB-2017-0127 and EB-2017-0128) included a thorough discussion of the applicability of performance-based conservation. The issues with respect to the current evaluation process could be readily addressed by using performance-based conservation for the building sector. Although already proven in Sustainable Schools, Greening Health Care and the Mayors Megawatt Challenge, an IESO pilot project began in March 2015. It included three local electric distribution utilities (Alectra Utilities, Milton Hydro, and Halton Hills Hydro), natural gas distribution utilities (Union Gas and Enbridge) and regional water utilities (Peel Water and Halton Water) in the rapidly growing north-west corner of the Greater Toronto

Area. The utility companies worked together on customer engagement, data collection and education. The IESO has not yet released the report of the pilot study. However, the most recent Sustainable Schools Report is available¹. It shows that gas use continues to increase while significant reductions in electricity use has been achieved.

All of which is respectfully submitted.

¹ <https://sustainableschools.ca/wp-content/uploads/2017/06/2017-SUS-Top-Energy-Performing-Boards-report-1.pdf>