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Reply To: Albert M. Engel
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Our File No. 202766

VIA RESS AND EMAIL

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

Attention: Christine E. Long
Registrar and Board Secretary

Dear Ms. Long:

**Re: EB-2020-0091: Enbridge Gas Integrated Resource Planning Proposal
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 in the Greater Toronto Area and many others throughout Ontario. BOMA's members are large consumers of natural gas in the Enbridge Gas franchise area, and has a substantial interest in reliable and cost-effective gas delivery service.
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 and is currently an intervenor in the Dawn-Parking expansion proceeding (EB-2019-0159).

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) Exploring the range of options/solutions to defer or avoid future transmission and distribution facility expansion/reinforcement projects;
 - (b) Understanding what factors determine whether IRPAs will be appropriate to consider for future expansion/reinforcement projects in the Asset Management Plan;
 - (c) Clarification of the role of IRP;
 - (d) The appropriateness of the proposal to address IRP separately from DSM;
 - (e) Evaluating the applicability, cost and safety impacts of relying on Compressed Natural Gas, Low-Carbon and Non-gas Solutions as demand peak-shaving alternatives;
 - (f) 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 and confirmation that it will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel
AME/dd

cc: Michael Parkes, OEB (via email)
Michael Millar, OEB (via email)
Brandon Ott, EGI (via email)
David Stevens, Aird & Berlis (via email)
Tom Brett, Foglers (via email)
Marion Fraser, Fraser & Company (via email)
Bala Gnanam, BOMA (via email)