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June 8, 2020

Reply To: Albert M. Engel
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Our File No. 203216

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-2020-0152: Consultation on Implementing the Process for Enabling Customers to Opt Out of Time-of-Use Pricing

1. The Building Owners and Managers Association ("BOMA") is interested in participating in the above-noted stakeholder consultation activities.
2. BOMA frequently participates 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 electricity.
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.

BOMA's Interest in the Consultation Activities

6. BOMA is particularly interested in the following aspects of the consultation:
 - (a) The scope of amendments to the Standard Supply Service Code and other regulatory instruments required in order to ensure the timely, efficient and effective implementation of the opt-out mechanism announce on June 1, 2020;
 - (b) Proposed changes to billing systems and the development of tools to assist customers in making informed decisions about which price structure is right for them;
 - (c) Proposed process and steps for opt out and opt in of the TOU price structure;
 - (d) Generally to represent the interests of commercial, office, retail and institutional consumers in this consultation.

Nature and Scope of BOMA's Intended Participation

7. BOMA intends to participate in all aspects of the consultation process, including the initial stakeholder meeting scheduled for June 9, 2020.
8. BOMA is interested in being part of the TOU Customer Choice Working Group.

Intention to Seek an Award of Costs

9. As a representative of a large sector of energy consumers throughout Ontario, the commercial, office, retail and institutional building owners and managers, BOMA intends to request an award of costs in this consultation process.

Addresses of Representatives

10. 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 stakeholder consultation participation request and confirmation that it will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel

AME/dd

cc: Shona Adamson, OEB (*via email*)
Brian Hewson, OEB (*via email*)
Tom Brett, Foglers (*via email*)
Marion Fraser, Fraser & Company (*via email*)
Bala Gnanam, BOMA (*via email*)