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Our File No. 202766

VIA RESS AND EMAIL

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

Attention: Christine E. Long,
Registrar and Board Secretary

Dear Ms. Long:

Re: EB-2020-0091: Enbridge Gas Inc.– Integrated Resource Planning Proposal

Having reviewed the Draft Issues List and the comments of other intervenors, BOMA continues to hold the position that the list includes appropriate draft issues to allow for review of Enbridge Gas's Integrated Resource Planning ("IRP") Proposal and to establish an IRP policy framework to guide Enbridge Gas's assessment of IRP alternatives.

BOMA supports the view of Enbridge Gas that the approach taken in the Draft Issues List that does not and should not conflate Enbridge Gas's IRP Proposal with matters more appropriately dealt with through other proceedings such as Enbridge Gas's: (i) forecasting methodologies; (ii) gas supply plan and planning principles; (iii) annual rate setting applications; (iv) asset management plan; (v) project-specific leave to construct applications; (vi) Post-2020 Demand Side Management Framework or DSM Plans; or (vii) transmission and storage optimization and operations.

BOMA agrees that this proceeding should not be used as a means of re-hearing matters previously decided by the Board or to address matters that are actively before the Board in other proceedings.

BOMA also agrees with the Enbridge Gas recommendations that Issue 12 be broadened to reflect its intention that, based on the results of its annual IRP report, Enbridge Gas may seek approval

to adjust investments in IRPAs previously approved by the Board (e.g. to shift funding to an alternate IRPA or to increase/decrease/cease investment in IRPAs).

Finally, BOMA agrees with Enbridge Gas' proposal to monitor and report on IRPAs through an annual IRP report, and to seek approval to adjust any previously approved investments in IRPAs based on the results of such reporting, as appropriate. Such proposal is consistent with the role of the Gas Supply Plan.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel

AME/dd

CC: All Parties (*via email*)