Fogler, Rubinoff LLP Lawyers



77 King Street West Suite 3000, PO Box 95 TD Centre North Tower Toronto, ON M5K IG8 t: 416.864.9700 | f: 416.941.8852 foglers.com

Albert M. Engel

Reply To:

Direct Dial: 416.864.7602

June 11, 2020

E-mail: aengel@foglers.com
Our File No. 195568 & 192379

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-2019-0271 Enbridge Gas Inc., 2021 Programs Roll-Forward and Post 2021

Framework

And Re: EB-2019-0003 Post-2020 Natural Gas Demand Side Management Framework

We are writing with respect to the Enbridge Gas application for an OEB order effective January 1, 2021 that would approve Enbridge Gas's 2021 DSM Plans to roll-forward the OEB-approved 2020 DSM Plans. The OEB assigned file number is EB-2019-0271. BOMA wishes to obtain greater certainty with respect to 2021 programming as early as possible to enable our members to plan their 2021 energy efficiency and greenhouse gas emissions reduction capital projects and operational improvements. Given that Enbridge Gas has filed its written argument-in-chief, together with the updated interrogatory response and 2019 program results today, almost two weeks ahead of the June 5, 2020 timeline required by Procedural Order No. 3, we support Enbridge Gas's request that the rest of the schedule be brought forward by the same period of time so that the OEB decision can be made in July and our members can move forward with their planning.

Also, in the interest of supporting multi-year decision making for energy efficiency and greenhouse gas emissions reduction capital projects, BOMA requests that the consultation process with respect to EB-2019-0003 Post-2020 Natural Gas Demand Side Management Framework be expedited to the greatest extent possible.

Many BOMA members are working towards deep reductions in emissions, including net zero goals, where Enbridge Gas programs form an important element of the life cycle economic analysis for investment. The Government of Ontario has confirmed, in its November 2018



Environmental Plan, a commitment to cost effective conservation of natural gas. BOMA commends the government for this commitment and is keen to play its part. Clarity and continuity of DSM programming are necessary to avoid delays in planning and investment.

BOMA also suggests that the post 2021 framework re-establish the constructive, consultative process that worked effectively in prior years.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel AE/dd

cc: All EB-2019-0271 Parties (via email)

All EB-2019-0003 Parties (via email)