

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.**

**2020 Federal Carbon Pricing Program Application**

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**SUBMISSIONS OF THE  
BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO  
("BOMA")**

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**July 9, 2020**

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## **SUBMISSIONS OF BOMA**

### **Background**

1. On November 11, 2019, Enbridge Gas Inc. (Enbridge Gas) applied to the OEB for approval under section 36(1) of the Ontario Energy Board Act, 1998 (OEB Act) to increase rates effective April 1, 2020 to recover costs associated with meeting its obligations under the federal Greenhouse Gas Pollution Pricing Act (GGPPA). Enbridge Gas also applied to recover from customers the 2019 balances in the related deferral and variance accounts.
2. On November 22, 2019, BOMA applied for intervenor status and cost award eligibility in this proceeding.
3. On February 6, 2020 the OEB issued Procedural Order No. 1 in this proceeding. As part of that order, the OEB denied BOMA's application for intervenor status because the OEB was not able to assess whether BOMA has a "substantial interest" in the proceeding.
4. On February 11, 2020, the OEB issued an Interim Decision and Order approving Enbridge Gas' proposed rates for the Federal Carbon Charge and Facility Carbon Charge on an interim basis, effective April 1, 2020. The OEB did not approve disposition of Enbridge Gas' FCPP-related deferral and variance accounts, even on an interim basis, and directed Enbridge Gas to file updated evidence with the final December 31, 2019 balances in these accounts when audited numbers are available.
5. On February 12, 2020, BOMA re-applied for intervenor status and cost award eligibility detailing its interest in the following specific aspects of the proceeding:

- The calculation and recovery of the applicant's carbon pricing-related costs which it is obliged to pay the federal government, pursuant to the GGPPA, including the applicant's facilities-related obligations and Output-Based Pricing System (OPBS) costs under the GGPPA.
  - The proposed disposition and allocation of the 2019 costs in the six variance and deferral accounts, which the Board established in the EB-2018-0205 proceeding, including prudence of the costs incurred, the timing, allocation of, and recovery period for, such costs.
6. On March 19, 2020, the OEB approved BOMA's intervention request related to the balances recorded in and the disposition of the FCPP-related deferral and variance accounts.
  7. On May 14, 2020, in accordance with the OEB's direction of February 11, 2020, Enbridge Gas filed an updated application that included: (i) actual December 31, 2019 balances in the Federal Carbon Pricing Program-related deferral and variance accounts for which disposition is being sought (along with updates to the associated schedules); and (ii) discusses options for the approach to disposition of the balances that would smooth bill impacts.
  8. In accordance with Procedural Order No. 2 dated May 22, 2020, on June 4, 2020 BOMA submitted interrogatories concerning the updated application.
  9. On June 18, 2020, Enbridge Gas provided responses to the interrogatories.

10. On June 25, 2020, Enbridge Gas filed its Argument-in-Chief in support of its amended application.

**BOMA's submissions on its issues of interest**

*The calculation and recovery of Enbridge Gas' carbon pricing-related costs which it is obliged to pay the federal government, pursuant to the GGPPA, including the applicant's facilities-related obligations and Output-Based Pricing System (OPBS) costs under the GGPPA.*

11. BOMA has reviewed Enbridge Gas' updated application and Argument-in-Chief and accepts the calculations as presented.

*The proposed disposition and allocation of the 2019 costs in the six variance and deferral accounts, which the Board established in the EB-2018-0205 proceeding, including prudence of the costs incurred, the timing, allocation of, and recovery period for, such costs.*

12. BOMA has reviewed Enbridge Gas' updated application and Argument-in-Chief and accepts the disposition and allocation of the 2019 costs in the six variance and deferral accounts, which the Board established in the EB-2018-0205 proceeding. On the basis of Enbridge Gas' answers to interrogatories and Argument-in-Chief, BOMA accepts that the costs were incurred prudently and has no concerns with the timing, allocation of, and recovery period for, such costs as set out in the updated application.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF BOMA  
ON JULY 9, 2020**

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**Albert M. Engel, Counsel for BOMA**