

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Sched. B, as amended;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders related to its Voluntary Renewable Natural Gas Program;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders amending or varying the rates charged to customers for the sale, distribution, transmission, and storage of gas commencing as of January 1, 2021.

**WRITTEN SUBMISSIONS OF
THE BUILDING OWNERS AND MANAGERS ASSOCIATION ("BOMA")**

July 16, 2020

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SUBMISSIONS OF BOMA

BOMA continues to support the Renewable Natural Gas Program. It is disappointing that other intervenors and the Board continue to delay this important signal to customers about the importance of green energy and the opportunities that exist for them. It has been at least since 2011 that Enbridge has indicated its support for approval to establish a program. It is not for intervenors or the Board to design the program.

In 2006 and 2009, the Undertakings between the Province and Enbridge were amended to enable, inter alia, Enbridge to provide services that would assist the Government of Ontario in achieving its goals in energy conservation. This included the promotion of cleaner energy sources, alternative energy sources and renewable energy sources. Enbridge proposed to expand the market and supply for renewable natural gas since then. Both proposals predated the very detailed requirements under Ontario's Cap and Trade Program and Directives to the OEB enhanced the messages underlying the change in Undertakings.

The now absence of a Cap and Trade Program in no way reduces the need for Ontario to reduce its carbon footprint. As natural gas is a major source of carbon to heat buildings in Ontario, the absence of a Cap and Trade mechanism does not reduce the importance of this initiative.

In fact, Bill 4 re-enforces the need to reduce carbon in Ontario. Key excerpts are:

- The Government shall establish targets for the reduction of greenhouse gas emissions in Ontario and may revise the targets from time to time.
- The Government shall make the targets and any revisions to them available to the public on a website of the Government or in such other manner as may be prescribed.

- The Minister, with the approval of the Lieutenant Governor in Council, shall prepare a climate change plan and may revise the plan from time to time.
- The Minister may, for the purpose of preparing the climate change plan, appoint panels to perform such advisory functions as the Minister considers advisable.
- The Minister shall make the plan and any revisions to it available to the public on a website of the Government or in such other manner as may be prescribed.

In the November 2018 Made-in-Ontario Environment Plan, the Ontario Government indicated its plans to meet Ontario's 2030 emission reduction target, including increased use of clean fuels such as RNG. The Government also highlighted its goal of increasing access to clean and affordable energy for families. Taking these items into account, the Made-in-Ontario Environment Plan requires natural gas utilities to implement a voluntary RNG option for customers

BOMA supports Enbridge's Application.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF BOMA
ON JULY 16, 2020**

Albert M. Engel, Counsel for BOMA