



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

Reply To: Albert M. Engel
Direct Dial: 416.864.7602
E-mail: aengel@foglers.com

Our File No.: 205038

October 5, 2020

VIA RESS AND EMAIL

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

Attention: Christine E. Long,

Board Secretary

Dear Ms. Long:

Re: EB-2020-0212: Enbridge Gas Inc., 2021 Federal Carbon Pricing Program

- 1. The Building Owners and Managers Association ("BOMA") seeks intervenor status and cost award eligibility in the above noted proceeding.
- 2. BOMA is a frequent intervenor 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 throughout Ontario. BOMA's members are large consumers of natural gas throughout the province, and are affected by any changes in Enbridge's rates and terms of services.
- 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.

Interest of the Intervenor in this Proceeding and the Grounds for the Intervention

- 6. BOMA is interested in the following specific aspects of this proceeding:
 - (a) Examining the prudency of the applicant's incurred costs of compliance with the GGPPA which the application proposes to continue to treat as a pass-through to customers (Y Factor);
 - (b) Examining the applicant's forecast 2021 Administration Costs;



(c) Generally to represent the interests of commercial, office, retail and institutional consumers in this process.

Nature and Scope of the Intervenor's Intended Participation

7. BOMA intends to participate in all pre-hearing procedures, including such interrogatories, technical conferences, or settlement conference, as the Board may direct. It also intends to participate in any written or oral hearing for which the Board may provide.

Intention to Seek an Award of Costs

8. As a representative of a large sector of energy consumers throughout Ontario, the commercial, office, retail and institutional building owners and managers, BOMA seeks a cost award in this proceeding.

Addresses of Representatives

9. 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
Fogler, Rubinoff LLP	Fogler, Rubinoff LLP	Fraser & Company
77 King Street West	77 King Street West	65 Harbour Square
Suite 3000	Suite 3000	Suite 1005
Toronto, Ontario	Toronto, Ontario	Toronto, Ontario
M5K 1G8	M5K 1G8	M5J 2L4
Tel: (416) 941-8861	Tel: (416) 864-7602	Tel: (416) 941-9729
tbrett@foglers.com	aengel@foglers.com	marion.fraser@rogers.com

BOMA respectfully requests your acceptance of this intervention and confirmation that it will be eligible for costs.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel AME/dd

CC: Adam Stiers, EGI (via email)
Tania Persad, EGI (via email)
Tom Brett, Foglers (via email)
Marion Fraser, Fraser & Company (via email)
Bala Gnanam, BOMA (via email)