

**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 Hydro Ottawa Limited for an order or orders related to its Electricity Distribution Rates and Other Charges for the Period from January 1, 2021 to December 31, 2025.

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

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**October 20, 2020**

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## **SUBMISSIONS OF BOMA**

BOMA supports the Submissions of Environmental Defence dated October 16, 2020 ("**ED Submission**") on the unsettled issue in this proceeding of whether the fixed monthly charges that Hydro Ottawa seeks to levy on its commercial and industrial customers in its over 50 kW rate classes are appropriate.

BOMA submits that the fixed monthly charges are not appropriate, for the reasons detailed in the ED Submission.

BOMA members have made great efforts to reduce their demand through various energy reduction initiatives. They are inadequately compensated for the benefits that their initiatives provide to the distribution system as a result of the current and proposed fixed costs being so high above the Board's ceiling.

BOMA submits that the Board provide Hydro Ottawa with 3 years to bring the fixed rates more in line with the Board's ceiling. Doing so would incent further conservation measures.

As noted by Environmental Defence the Board's lengthy generic hearing on this issue, despite much hard work, has been unable to resolve the issue with the utilities proposing to retain the status quo and most customers/intervenors proposing to reduce the fixed charges to the Board's minimum amounts. The Board needs to break the gridlock. Hydro Ottawa is an appropriate proceeding in which to begin the change as Hydro Ottawa has a large light commercial industrial load with great opportunities for energy efficiency and distributed generation.

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

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