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November 18, 2020

Reply To:Albert M. EngelDirect Dial:416.864.7602E-mail:aengel@foglers.comOur File No.205271

VIA RESS AND EMAIL: registrar@oeb.ca

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

Attention: Christine E. Long, <u>Board Secretary</u>

Dear Ms. Long:

Re: EB-2020-0181: Enbridge Gas Inc., Phase 2: 2021 Rates Application

- 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 the Proceeding and the Grounds for the Intervention

6. BOMA is interested in the following specific aspects of this proceeding:





- Scrutinizing the materiality, need and prudence of the 2021 ICM Projects (St Laurent NPS 12 Replacement in the EGD rate zone, and the London Line Replacement Project and the Sarnia Industrial Reinforcement Project in Union rate zones);
- (b) The impact of the 2021 ICM Projects on the rates paid by BOMA members;
- (c) Comparing the consolidated Utility System Plan to the expectations set out in the OEB's Renewed Regulatory Framework;
- (d) Comparing the Asset Management Plan 2021-2025 to the expectations set out in the *Handbook for Utility Rate Applications* and the *Filing Requirements for Natural Gas Rate Applications*;
- (e) Reviewing the results reported in the Customer Engagement Study; and
- (f) Generally to represent the interests of commercial, office retail and institutional consumers.

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
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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: Khalil Viraney, OEB (via email) Mark Kitchen, EGI (via email) David Stevens, Aird and Berlis (via email) Tom Brett, Foglers (via email) Marion Fraser, Fraser & Company (via email) Bala Gnanam, BOMA (via email)