

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sch. B;

AND IN THE MATTER OF an application by Enbridge Gas Inc. ("EGI"), for an order or orders for gas distribution rate changes related to compliance obligations under the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186. (2021 Federal Carbon Pricing Program ("FCPP") Application)

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

January 11, 2021

Albert M. Engel
Fogler, Rubinoff LLP
77 King Street West, Suite 3000
P.O. Box 95, TD Centre North Tower
Toronto, ON M5K 1G8

Counsel for BOMA

SUBMISSIONS OF BOMA

Overview

1. BOMA supports this application as customers will be charged the applicable Federal Carbon Charge rate monthly based on actual billed volumes, and the quantum of administration costs and disposition of related deferral and variance accounts (DVAs) are out of scope in this proceeding. However, consideration should be given in a future proceeding as to whether the Facility Carbon Charge should be presented as a separate line item on customer's bills as the Federal Carbon Charge currently is. This would enable customers to quickly and easily see the entire impact of the FCPP on their monthly gas bill, as opposed to just the Federal Carbon Charge, with the Facility Carbon Charge currently being embedded in distribution, delivery or transportation charges.

Background

2. On September 30, 2020, EGI applied to the OEB for approval under section 36(1) of the *Ontario Energy Board Act, 1998* to increase rates effective April 1, 2021 to recover costs associated with meeting its obligations under the federal *Greenhouse Gas Pollution Pricing Act (GGPPA)*.
3. On October 5, 2020, BOMA applied for intervenor status and cost award eligibility in this proceeding.

4. On November 10, 2020 the OEB issued Procedural Order No. 1 in this proceeding. As part of that order, the OEB granted BOMA's application for intervenor status and cost award eligibility.
5. On November 20, 2020, the OEB issued a Decision on Scope of Proceeding, in which the OEB confirmed that the reviewed of the application will be limited to considering the recovery of EGI's costs related to the FCPP.
6. In accordance with Procedural Order No. 1 dated November 10, 2020 and the November 20, 2020 Decision on Scope of Proceeding, on November 24, 2020 BOMA served and filed interrogatories with respect to the application.
7. On December 8, 2020, EGI provided responses to all interrogatories.
8. BOMA has reviewed the application and responses to interrogatories and is supportive of the application. BOMA suggests that consideration be given in a future proceeding as to whether the Facility Carbon Charge should be presented as a separate line item on customer's bills to enable customers to quickly and easily see the entire impact of the FCPP on their monthly gas bill.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF BOMA
ON JANUARY 11, 2021**



Albert M. Engel, Counsel for BOMA