

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc., pursuant to section 36(1) of the Ontario Energy Board Act, 1998, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2021.

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

March 12, 2021

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SUBMISSIONS OF BOMA

Overview

1. BOMA is generally supportive of the submissions of the Ontario Greenhouse Vegetable Growers ("OGVG") filed on March 11, 2021, Energy Probe and the London Property Management Association ("LPMA") filed on March 12, 2021 in this matter.

Background

2. On October 15, 2020, Enbridge Gas Inc. ("EGI") filed an application with the Ontario Energy Board ("OEB") under section 36 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, seeking OEB approval for Incremental Capital Module ("ICM") funding for three projects in 2021 – the St Laurent NPS 12 Replacement ("St. Laurent Phase 3 Project") in the EGD rate zone, and the London Line Replacement Project ("London Project") and the Sarnia Industrial Reinforcement Project ("Sarnia Project") in Union rate zones. EGI withdrew its request for 2021 ICM funding related to the St. Laurent Phase 3 Project on February 10, 2021.
3. Intervenors filed interrogatories on December 21, 2020 and EGI filed responses on January 21, 2021.
4. On February 17, 2021, a technical conference was held in response to intervenor requests for clarity on certain interrogatory responses.
5. EGI filed responses to technical conference undertakings on February 26, 2021 and its argument-in-chief on March 1, 2021.

6. On March 11, 2021, OGVG filed submissions calling for the OEB to reject EGI's request for ICM funding in respect of the Sarnia Industrial Reinforcement Project arguing that it is self-funding. EGI confirmed that it forecast the incremental revenue from the Sarnia Project between 2021 and 2023 to be \$5,813,000¹ and a total forecast revenue requirement over the same period of \$3,922,000².
7. BOMA had an opportunity to review the submissions of Energy Probe and LPMA and supports those submissions that call for the approval of EGI's ICM funding request for the London Project but at a lower level than that proposed by EGI for the reasons submitted by Energy Probe and LPMA.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF BOMA
ON MARCH 12, 2021**



Albert M. Engel, Counsel for BOMA

¹ Exhibit I.STAFF.4 c).

² Exhibit I.OGVG.1 Page 3 of 3.