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May 11, 2021

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Our File No. 210903

**VIA RESS AND EMAIL**

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
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Attention: Christine E. Long,  
Registrar & Board Secretary

Dear Ms. Long:

**Re: EB-2021-0004: Enbridge 2021 Annual Update to 5 Year Gas Supply Plan  
Written Commentary of Building Owners and Managers Association (BOMA)**

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**Description of the Intervenor and its Membership**

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.

As legal counsel to BOMA, we participated in the April 26-27 Stakeholder Conference whereby EGI presented a summary of its 2021 Gas Supply Plan (GSP) Annual Update and responded to questions posed by intervenors.

**Performance Measurement**

Per Section 3.1.6 of the Framework, Performance Measurement, the distributor is to develop performance metrics to be used to assess whether the guiding principles have been achieved.

As outlined in BOMA's Gas Supply Plan Conference Questions and further probed during the Stakeholder Conference by Mr. Brophy of Pollution Probe and Mr. Quinn of Federation of

Rental-Housing Providers of Ontario (FRPO), it is difficult for independent parties, such as intervenors, to corroborate whether objectives/guiding principles have been achieved without goals and/or context set against metrics scored.

BOMA recognizes that there are improvements that could be made to the scorecard to provide greater context which would ultimately provide greater transparency.

### **Sustainable Natural Gas**

BOMA notes that the usage of “sustainable” in Sustainable Natural Gas (SNG) may cause confusion for some parties, as the term is often associated with decarbonized fuel, which SNG is not. BOMA suggests another term may be more appropriate.

### **Conclusion**

BOMA appreciates the opportunity to provide commentary on EGI’s 2021 GSP update.

Yours truly,

**FOGLER, RUBINOFF LLP**



Albert M. Engel

AME/dd

CC: All Parties (*via email*)