

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** *the Ontario Energy Board Act, 1998, S.O. 1998, c. 15 (“Act”);*

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for Multi-Year Demand Side Management Plan (2022 to 2027)

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**SUBMISSIONS OF**  
**THE BUILDING OWNERS AND MANAGERS ASSOCIATION (“BOMA”)**

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**July 6, 2021**

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## **BOMA SUBMISSIONS**

We have examined Enbridge's proposed 2022 DSM Plan and have the following comments for consideration as the Plan is finalized.

1. BOMA members have two primary interests related to natural gas conservation in their buildings which serve to frame our response to the proposed Plan:
  - a. Lowering utility costs which represent a significant share of total operating costs. Cost containment is an even greater priority during this time of uncertainty resulting from the pandemic. Natural gas costs are of increasing concern as progressive introduction of the carbon tax drive them up far above the rate of inflation.
  - b. Managing the multi-year transition to low carbon operations and ultimately net zero emissions. In Ontario, natural gas is the primary contributor to Scope 1 and 2 emissions, and significant planning and capital investment will be needed to convert plant and equipment to meet deep emissions reduction targets.
2. BOMA members are long-term planners requiring certainty and continuity in DSM programming and generally support the proposed approach of incremental improvement of effective current programs in 2022.
3. BOMA appreciates the difficulties of the past 18 months but regrets the delays in confirming DSM programming moving forward. We note the proposed timeline for getting the 2022 Plan in place and encourage all parties to adhere to or improve upon this schedule in order to avoid further loss of savings.
4. BOMA welcomes the commitment to collaboration and coordination between DSM and CDM programs which we anticipate leading to more holistic and cost-effective solutions and less administrative burden.
5. BOMA notes the OEB's direction with respect to coordination with other external parties. BOMA members have a long history of voluntary collaborative initiatives including the Race to Reduce and the City of Toronto's Green Will Initiative and look forward to active Enbridge involvement with such programs to ensure natural gas savings are maximized.

6. BOMA welcomes the concept of the Low Carbon Transition Strategy, which could help members plan and implement this transition for their buildings, but looks to a broader approach which includes electric as well as gas-fired heat pump applications and other fundamentals including high efficiency exhaust air and discharge water heat recovery.
7. BOMA welcomes the proposed Framework approach which makes clear the policy objectives, guiding principles and rules and helps provide greater certainty for planning. We also appreciate the commitment to a mid-term review and possible course correction during the 6-year term of this Plan and to a longer-term gas reduction target, which extends to the subsequent plan and reflects continuously improving empirical knowledge about the magnitude of the achievable savings potential.
8. BOMA remains concerned that claimed gas savings must be real in order for the economic case for DSM to make sense for its members and other ratepayers and again recommends that measurement and verification be based, to the greatest extent possible, on measured savings at the meter rather than assumptions and calculations.
9. BOMA supports Research, Development and Innovation funding, including case studies, demonstration projects and technology evaluations, which can address current knowledge gaps, validate best practices and help members make business cases for investment.
10. BOMA welcomes the proposed Pay for Performance program targeting low-cost operational improvements over multi-year agreements, which is to be piloted in schools, and looks for early expansion to the other building segments owned and operated by BOMA members.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF BOMA ON  
JULY 6, 2021**



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