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Reply To: Albert M. Engel  
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Our File No. 214114

**VIA RESS AND EMAIL**

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

Attention: Christine E. Long,  
Registrar & Board Secretary

Dear Ms. Long:

**Re: EB-2021-0106: Updating CDM Guidelines for Electricity Distributors**

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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 electricity throughout the province.
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:
- (a) All aspects that relate to the cost of electricity use, in particular GA charges;
  - (b) CDM continuity during the transition between frameworks;
  - (c) Opportunities arising through the Local Initiatives Program;
  - (d) Coordination between CDM and DSM programs including electricity-based solutions for reducing greenhouse gas emissions; and
  - (e) Generally, to represent the interests of commercial, office, retail and institutional consumers in this process.

#### **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:

Albert Engel, Partner	Rachel Fielding, Associate	Ian Jarvis, President	Marion Fraser, President
Fogler, Rubinoff LLP	Fogler, Rubinoff LLP	Enerlife Consulting Inc.	Fraser & Company
77 King Street West	77 King Street West	90 Eglinton Ave. East	65 Harbour Square
Suite 3000	Suite 3000	Suite 412	Suite 1005
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<a href="mailto:aengel@foglers.com">aengel@foglers.com</a>	<a href="mailto:rfielding@foglers.com">rfielding@foglers.com</a>	<a href="mailto:ijarvis@enerlife.com">ijarvis@enerlife.com</a>	<a href="mailto:marion.fraser@rogers.com">marion.fraser@rogers.com</a>

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: Michael Parkes, OEB (*via email*)  
Michael Millar, OEB (*via email*)  
Rachel Fielding, Foglers (*via email*)  
Ian Jarvis, Enerlife (*via email*)  
Marion Fraser, Fraser & Company (*via email*)  
Bala Gnanam, BOMA (*via email*)