



Fogler, Rubinoff LLP

Lawyers

77 King Street West
Suite 3000, PO Box 95
TD Centre North Tower
Toronto, ON M5K 1G8

t: 416.864.9700 | f: 416.941.8852
foglers.com

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Reply To: Albert M. Engel
Direct Dial: 416.864.7602
E-mail: aengel@foglers.com
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

Per the OEB's August 5, 2021 letter, the Building Owners and Managers Association ("BOMA") submits the following comments on the OEB staff discussion paper and proposed updates to the CDM guidelines.

By way of context, many BOMA members are actively engaged in the national and global transition to net zero greenhouse gas emissions on or before the federal commitment of 2050. BOMA is committed to playing its part in achieving this goal and seeks to do so at the least life cycle cost which includes keeping down GA and demand charges on electricity bills. BOMA members are major and constructive players in Ontario's energy system, including demand response (DR) programs to help improve system efficiency and reduce infrastructure costs. They have made considerable use of CDM and DSM incentive programs over the years, which have helped to make the business case for investment in energy efficiency and achieve substantial energy savings. They have also benefitted from technical advice and support from their LDCs and gas suppliers in navigating increasingly complex decision-making related to cost containment and emissions reductions.

BOMA understands and accepts the decision to centralize most CDM programming within the IESO and that much of the LDCs' technical support capacity has already been disbanded. As the new CDM guidelines are developed, BOMA's main interests will be in the following areas:

- **Distribution Rate-Funded CDM Activities and Role of CDM in System Planning**

As major electricity users in most LDC territories, BOMA members seek to be active participants in initiatives aimed at improving system efficiency and deferring or avoiding infrastructure investments, with these efforts in turn leading to lower electricity costs. Many members are already investing in DR and EV infrastructure as well as energy efficiency and expect local and regional coordination between energy suppliers along with technical support to ensure the impacts of these efforts are optimized for the greater good.

- **Role of Distributors in the Local Initiatives Program (LIP)**

BOMA welcomes the LIP with its specific consumption and demand reduction targets and its geo-targeted approach to address specific local challenges. BOMA proposes to support outreach to its members in the targeted regions with the aim of helping them become active players in and beneficiaries of resulting DER projects.

- **Distributor Staffing Costs for CDM and Related Activities**

BOMA members have valued the support of their local trusted electrical distributors and BOMA is in favour of LDCs recovering reasonable costs incurred in helping the effective and economical transition of Ontario's energy system to the requirements of the low carbon future.

- **CDM/DSM Coordination**

BOMA has been a consistent advocate for greater and more effective coordination and integration between CDM and DSM programs. BOMA members face great challenges in navigating increasingly complex decision-making around capital planning, equipment selection and organizational capacity-building to achieve their goals with respect to energy efficiency, emissions reduction and cost containment. BOMA recognizes the transition over time towards electrification and comprehensive heat recovery as well as the competing electricity- and gas-based technologies and the price differential between electricity and gas. BOMA members seek impartial and objective advice to help them chart their best courses to the low carbon future.

Yours truly,

FOGLER, RUBINOFF LLP



Albert M. Engel

AME/dd

CC: All Parties (*via email*)