fogler rubinoff

Fogler, Rubinoff LLP Lawyers 77 King Street West

Suite 3000, PO Box 95 TD Centre North Tower Toronto, ON M5K IG8 t: 416.864.9700 | f: 416.941.8852 foglers.com

Reply To:Albert M. EngelDirect Dial:416.864.7602E-mail:aengel@foglers.comOur File No.213224

October 4, 2021

VIA RESS AND EMAIL

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

Attention: Christine E. Long, <u>Registrar & Board Secretary</u>

Dear Ms. Long:

Re: EB-2021-0002: BOMA's Proposed Evidence regarding Enbridge Gas Inc., Multi-Year Natural Gas Demand Side Management

With respect to these proceedings, BOMA is of the opinion that expert evidence with respect to the existence, nature and effectiveness of North American and international DSM programs based on one or more principles of pay-for-performance (savings measured at the meter), close coordination/integration of electric and gas conservation programs and support for community-led strategic energy management initiatives will be beneficial to the OEB in considering options and priorities for a forward-looking multi-year DSM plan. It is proposed to conduct a wide scan of current practices in order to identify leaders in this area and then engage with a few selected jurisdictions to characterize and evaluate the impact of their relevant programs.

BOMA will coordinate with OEB staff and other intervenors with an interest in this area to build on other research and relationships and avoid any duplication.

BOMA has a long-standing interest in this type of programming which is considered the most effective for scaling up real energy savings, engaging with whole sectors and driving innovation. BOMA members in Ontario have been active participants in performance-based conservation with Enbridge and the IESO and in collaborative initiatives such as Greening Health Care, the Race to Reduce and Toronto's Tower Renewal Office STEP program for multi-residential buildings. BOMA welcomes the inclusion of the Energy Performance Program pilot in



Enbridge's application and looks forward to ongoing rapid development and deployment of this approach to energy efficiency and deep emissions reductions.

BOMA contemplates a level of effort in the order of \$55,000, including time required of counsel, and will prepare a more detailed project charter upon positive response from the OEB and consultation with the other interested parties.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel AME/dd CC: All Parties (*via email*)