



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

October 6, 2021

Reply To: Albert M. Engel  
Direct Dial: 416.864.7602  
E-mail: aengel@foglers.com  
Our File No. 213224

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

---

Further to our letter dated October 4, 2021 and the email from the OEB dated October 5, 2021, we are writing to provide additional information on the evidence that BOMA is proposing to introduce into these proceedings.

**Proposed Evidence**

The proposed evidence will address the following items from the final Issues List for this proceeding:

- General issue #3 – Industry Best Practices
- Specific Issue #16 – coordination with electricity conservation programs and other energy conservation programs

The evidence will focus on 3 specific areas of current practice in other jurisdictions around the developed world including Canada, the United States, the UK, the EU and Australia:

1. *Adoption and success of pay-for-performance (Performance-Based Conservation) DSM/CDM programming.*

BOMA is of the opinion that P4P DSM programming based on savings recorded at the meter is the most effective approach and is already driving innovation and continuous improvement leading to highly cost-effective gas and electricity savings in commercial buildings and portfolios. Knowledge of penetration and results of pay-for-performance programming, which has been pioneered in Ontario by Enbridge and the IESO over the past 5 years, across other jurisdictions can inform decision-making around the level and timing of commitment to this methodology which BOMA expects to be the biggest single contribution from this sector to overall energy, utility cost and emissions reductions. Based on findings, Enbridge's proposed pilot project for schools might be accelerated and extended sooner rather than later to the whole commercial sector.

2. *Close coordination/integration of DSM/CDM and carbon reduction programming which focuses on outcomes and customer experience rather than individual utilities.*

Building owners have specific objectives to sustainably reduce long-term utility costs and carbon emissions. Knowledge of other jurisdictions where utilities have gone beyond coordination to integrating their programs to help owners achieve these objectives most effectively and with the least administrative burden will inform a forward-looking multi-year DSM plan.

3. *Successful community-led strategic energy management initiatives developed or supported by gas and electric utility companies which have achieved substantial, sustained energy and emissions reductions.*

Ontario has also pioneered internationally recognized collaborative sectoral energy efficiency programs including the Race to Reduce (commercial office buildings), Greening Health Care (hospitals) and the City of Toronto's STEP program (multi-residential buildings) which have achieved remarkable, wide-scale energy reductions. These initiatives have been supported to varying degrees by both gas and electric utilities. Documentation of the nature, scale and impact of such initiatives in Ontario and around the world will help decide if and how to specifically incorporate Enbridge (and IESO) support for this type of programming.

### **Qualifications of Ian Jarvis P.Eng and Gillian Henderson MBA**

Mr. Jarvis and Ms. Henderson are principals of Enerlife Consulting, based in Ontario, which has been developing and applying the Performance-Based methodology across the commercial, institutional and multi-residential building sectors for more than a decade. Enerlife's current work spans Canada, the United States, the UK and Australia. The company has extensive

experience working with building owners applying legacy P4P Enbridge programming (Run It Right and Runsmart) as well as the IESO's Energy Performance Program. Ms. Henderson directed the Performance-Based Conservation pilot project sponsored jointly by Enbridge and the IESO in 2016-17. Mr. Jarvis and Ms. Henderson played leadership roles in the development and successful execution of the Race to Reduce which was recognized by UNEP in 2018. Mr. Jarvis testified before the OEB in the 2013 Enbridge Pipeline hearings including presenting evidence on DSM programming which could defer investment in new pipeline capacity. Their CVs are attached to this letter.

### **Approach to Developing the Evidence**

It is proposed to build on the experiences in Ontario and knowledge of other jurisdictions to conduct a wide scan of current practices which will identify and characterize leading DSM programs in this area. In consultation with other intervenors and OEB staff we will then engage with a few selected jurisdictions to document the nature and history of their relevant programs and evaluate their impact in terms of energy savings measured at the meters of commercial sector buildings.

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 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. The cost for interrogatory responses, a technical conference, and hearing will be in addition to that amount and are not estimated at this time.

Yours truly,

**FOGLER, RUBINOFF LLP**



Albert M. Engel

AME/dd

CC: All Parties (*via email*)

## IAN JARVIS BSc, PEng

President, Enerlife Consulting Inc., 2001 to present  
ian.jarvis@enerlife.com 416-915-1530 ext. 203

### SUMMARY OF PROFESSIONAL EXPERIENCE

Enerlife's founder and president since 2001, Ian Jarvis is a recognized business leader and authority on energy conservation, green buildings and sustainable communities. Ian has been at the leading edge of practice and research of high-performance buildings for more than three decades. He was the founding Chair of the Canada Green Building Council and co-chair of Civic Action's Race to Reduce. Ian provides strategic and technical advice to Enerlife's projects and clients, forms and leads Integrated Building Performance Teams, and brings unique knowledge and experience of achieving and sustaining exceptional performance in individual buildings and portfolios. He is an expert witness in regulatory hearings and advises governments and utility companies on policy and program design and evaluation. Ian has served on advisory boards for the Ontario Energy Board and the Independent Electricity System Operator. He is an accomplished speaker and workshop leader and leads the company's outreach work across North America, the United Kingdom and Australia.

Ian is the principal architect of Enerlife's evidence-based building performance diagnostic, management and reporting methodology, tools and online system. His knowledge is grounded in over 30 years of experience designing, implementing and measuring savings in energy efficiency projects in a wide range of building types for clients in the municipal, commercial, school board, healthcare, and multi-unit residential sectors.

Ian co-chaired the working group for Civic Action's Race to Reduce from 2013-2016, a large-scale, collaborative program among landlords and tenants which is substantially improving the energy and environmental performance of office buildings. He has served as an adjudicator of the NAIOP REX Green Award for commercial buildings. In 2015, he received the Leader Award from the Canada Green Building Council's Greater Toronto Chapter.

From 1992 to 1999 Ian was CEO of a leading energy performance contractor responsible for many of the largest energy retrofit projects in North America. Ian served as founding chair of the Canada Green Building Council from 2003-2007, and as a director of Milton Hydro, one of the most progressive local electric distribution utilities in Ontario, from 2000-2007.

Ian represented the energy efficiency industry on the 1998 Team Canada trade mission to South America and was the Canadian Government's invited private sector representative at the 1999 Hemispheric Energy Ministers' Conference in New Orleans. In 2001 he was a member of Premier Hamm's expert panel advising the Nova Scotia Government on energy policy alternatives.

### HIGHLIGHTS OF EXPERIENCE

- Over 30 years of experience at the leading edge of energy performance in buildings
- Principal architect of performance-based conservation methodology as an evidence-based approach for achieving and sustaining exceptional energy efficiency in buildings

### AREAS OF SPECIALIZATION

- Vision and strategy development
- Authority on evidence-based energy conservation in buildings
- Portfolio and sectoral program design
- Author of thought leadership articles & reports
- Leadership of multi-disciplinary workshops and project teams
- Keynote addresses and speaking engagements

### PROFESSIONAL AFFILIATIONS

- Founding Chair, Canada Green Building Council (2003 – 2007)
- Member, National Advisory Council on Energy Efficiency (1999 to 2014)
- Member, Ontario Energy Minister's Advisory Committee (2006 – 2011)
- Professional Engineers Ontario

### ACADEMIC QUALIFICATIONS

- Bachelor of Science (Honours), Mechanical Engineering, Imperial College of Science and Technology, University of London

## GILLIAN HENDERSON BA (Hon), MBA, LEED AP

Vice President-Operations, Enerlife Consulting Inc., 2002 to present  
gillian.henderson@enerlife.com 416-915-1530 ext. 208

### SUMMARY OF PROFESSIONAL EXPERIENCE

Gillian leads the company's work in management consulting, strategic programs and project management and social marketing. With over 20 years of experience in change management, energy efficiency and sustainability, she has executive responsibility for projects and programs in the commercial office, municipal, retail, post-secondary and multi-residential sectors. She has extensive experience with development of public and private sector strategic plans to achieve low-carbon goals, stakeholder engagement, effective program design, and implementation. She developed market research, best practice guides and documentation to support performance-based conservation and sustainability initiatives with measurable results. Gillian has also conducted research and analysis in benchmarking and energy efficiency and developed and implemented engagement and communication programs aimed at realizing sustainability goals.

Gillian chaired the Collaboration Committee for Civic Action's Race to Reduce, a large-scale, collaborative program among landlords and tenants aiming to substantially improve the energy and environmental performance of office buildings. She led the Performance-Based Conservation pilot with Ontario's Independent Electricity System Operator and Enbridge in the service areas for Alectra, Milton Hydro and Halton Hills Hydro which included over 200 municipal, school and commercial office buildings and was senior project manager for the development of the Region of Peel Greenhouse Gas Emission Reduction Prioritization Methodology and Implementation Plan.

### HIGHLIGHTS OF EXPERIENCE

- Leads Enerlife's market analysis and best practice research
- Development and management of projects and programs in commercial building sectors
- Over 20 years of experience in energy efficiency and sustainability

### AREAS OF SPECIALIZATION

- Market dynamics and change management
- Engagement and communications
- LEED O + M implementation

### ASSOCIATIONS

- LEED Accredited Professional
- Collaboration (Engagement) Committee Chair, Race to Reduce
- CaGBC LEED O+M Faculty Selection Committee

### ACADEMIC QUALIFICATIONS

- Master of Business Administration (1<sup>st</sup> Class Honours), University College Dublin
- Adult Training & Development Program, Ontario Institute for Studies in Education (OISE)
- Project Management Certificate, Project Management Institute, University of Toronto
- Bachelor of Arts (Honours), Queens University