

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** an Application for Multi-Year Natural  
Gas Demand Side Management Plan (2022 to 2027)

---

**INTERROGATORIES OF**  
**THE BUILDING OWNERS AND MANAGERS ASSOCIATION ("BOMA")**

---

**October 21, 2021**

**Albert M. Engel**  
Partner  
Fogler, Rubinoff LLP  
77 King Street West, Suite 3000  
Toronto, ON M5K 1G8  
**Counsel for BOMA**

## **BOMA's Interrogatories**

*Note that, wherever applicable, BOMA's comments and questions relate only to the Commercial Buildings sector.*

**Issue 8:** Has Enbridge Gas proposed an optimal suite of program offerings that will maximize natural gas savings and provide the best value for rate payer funding?

- **Issue 8f:** Are Enbridge Gas's proposed energy performance program offerings appropriate?
  - BOMA is supportive of the introduction of this P4P program to complement the IESO's Energy Performance Program. We expect these programs to be well coordinated and to significantly increase participation and natural gas and electricity savings among BOMA members with more holistic and innovative solutions.
  - BOMA is supportive of this type of multi-year programming where savings are measured at the meter rather than by assumptions and calculations.
  - BOMA notes that its members own building types which lend themselves to benchmarking in the same way as schools.

- **Interrogatory # 8-BOMA-1**

Reference: EB-2021-0002, Exhibit E, Tab 2, Schedule 1, Page 3, Section 8

- Under what circumstances will this offering be expanded to other segments during the course of this framework? How would such an expansion be funded?
- **Issue 8h:** Is Enbridge Gas's proposed low carbon transition program appropriate?
  - Many BOMA members have committed to meeting national and provincial goals with respect to carbon reduction. BOMA agrees that utility companies such as Enbridge Gas have an important role to play in this transformation.
  - Given that this framework covers a substantial part of the remaining time before the 2030 and 2050 goals, BOMA considers the nature and scale of the proposed program to be inadequate.
  - The low carbon transition will be founded on maximizing energy efficiency (including organizational capability building), comprehensive heat recovery and electrification, requiring close coordination of program offerings with the IESO and other organizations.

- BOMA acknowledges the role that natural gas will play over the coming years in making the low carbon transition more affordable but is not supportive of the proposed standalone Commercial (gas-fired) Heat Pump Program offering. BOMA members seek objective advice on the range of options available to them as they work towards low carbon goals.

- **Interrogatory # 8-BOMA-2**

Reference: EB-2021-0002, Exhibit E, Tab 3, Schedule 1, Page 1, Section 2 “Enbridge Gas’s Low Carbon Transition program is designed to support the plans of the federal government to bring these types of low carbon technologies to market. The Low Carbon Transition program specifically focuses on expanding the deployment of heat pump technologies...”

- Has Enbridge evaluated the relative merits of other low carbon technologies including VRF, GeoExchange, exhaust air and discharge water heat recovery and electric heat pumps compared against gas-fired heat pumps in terms of potential emission reductions and cost effectiveness? If so, please provide the results of this comparative analysis.
- Has Enbridge explicitly consulted with the IESO regarding a coordinated approach to helping meet national and provincial carbon reduction goals? If so, what conclusions were reached? What limitations are there on collaboration to help maximize carbon reductions?
- Does Enbridge have the authority to support GeoExchange (ground source heat pump) installations?

**Issue 9:** Are Enbridge Gas’s proposed research and development activities appropriate?

- BOMA is supportive of applied research and development initiatives which identify and fill important knowledge gaps in working towards low carbon goals at least cost.
- BOMA acknowledges that Enbridge can play an important role in advancing knowledge of low carbon technologies and practices.
- As discussed under Issue 8h, BOMA members seek objective advice on the full range of low carbon options available to them. BOMA does not support research into individual technologies outside the comparative context of other options.

**Interrogatory # 9-BOMA-3**

Reference: EB-2021-0002, Exhibit E, Tab 4, Schedule 3, Page 2, Section 5 “The Company understands that it is a crucial time to move up the innovation adoption curve for energy efficiency

technology, and Enbridge Gas believes it has a central role to play in advancing the research and innovation necessary to support energy transition through the ongoing evolution of energy efficiency technology.”

- Will Enbridge adopt a more comprehensive R&D approach, working with other parties to address high impact knowledge gaps which can achieve the greatest carbon reductions as early as possible at the lowest life-cycle costs?
- Given the urgency of the climate change challenge, is the proposed R&D funding level sufficient to enable Enbridge to play its full role?

**Issue 10:** Are Enbridge Gas’s proposed changes to the OEB’s evaluation, measurement and verification process appropriate, including the proposed Terms of Reference?

- BOMA supports rigorous measurement and evaluation to ensure real (rather than assumed and calculated) savings are achieved and sustained over time.
- BOMA welcomes the introduction of the energy performance program, where savings are measured at the meter over multiple years and seeks further inclusion of metered savings throughout the evaluation process.

#### **Interrogatory # 10-BOMA-4**

Reference: EB-2021-0002, Exhibit C, Schedule 1, Page 1, Section 8

- To what extent does the Evaluation Contractor (EC) include at the meter savings verification as part of the evaluation and audit process? Please comment on Adjustment Factors and Verification Adjustments in this regard.
- Approximately what proportion of the verified gas savings achieved in the 2015-2020 period were validated by measurements at the meter of participating buildings?

**Issue 14:** [as amended] *Has Enbridge Gas proposed a reasonable approach to ensure natural gas DSM programs are effectively coordinated with electricity conservation programs and other energy conservation and greenhouse gas reduction programs applicable in its service territory?*

- BOMA acknowledges the likelihood of cost efficiencies in program delivery due to coordination between Enbridge and the IESO and seeks further coordination and integration to mitigate the administrative burden of program participation to its members.
- BOMA welcomes the proposed addition of Enbridge’s P4P program to the IESO’s Energy Performance Program as an opportunity to further integrate a program offering.
- BOMA is particularly concerned to see close coordination between Enbridge and IESO programs and initiatives related to the transition towards the low carbon future.

- BOMA acknowledges the support provided by Enbridge for community-led energy efficiency and carbon reduction programs such as the Race to Reduce.

**Interrogatory # 14-BOMA-5**

Reference: EB-2021-0002, Exhibit E, Tab 4, Schedule 4, Page 4

- Are attribution issues resolved to allow full collaboration between Enbridge and the IESO?  
Are there any other impediments to collaboration?
- Would Enbridge support a formal working group with the IESO to jointly address challenges and opportunities related to progression towards the low carbon future?
- Is there funding capacity to support worthy community-led programs?