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Reply To: Albert M. Engel
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Our File No. 214981

VIA RESS AND EMAIL

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

Attention: Christine E. Long,
Registrar & Board Secretary

Dear Ms. Long:

Re: EB-2021-0209: Enbridge Gas Inc., 2022 Federal Carbon Pricing Program

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 natural gas throughout the province, and are affected by any changes in Enbridge's rates and terms of services.
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. As carbon pricing is a substantial and fast-growing part of BOMA members' utility costs, BOMA is interested in the following specific aspects of this proceeding:

- (a) Whether the rates to be applied to customer bills beginning April 1, 2022 that are being applied for are just and reasonable;
- (b) The appropriateness and reasonableness of the balances recorded in Enbridge Gas's FCPP-related deferral and variance accounts;
- (c) The costs incurred by Enbridge Gas in complying with the *Greenhouse Gas Pollution Pricing Act* ("GGPPA") and the Ontario Emissions Performance Standards ("EPS") program;
- (d) The update to the accounting orders to reflect the fact that as a result of the transition from the federal Output-Based Pricing System ("OBPS") for prescribed industrial facilities to EPS and in recognition that Enbridge Gas will be subject to both federal and provincial regulations beginning January 1, 2022;
- (e) Enbridge Gas's estimated 2022 administrative costs associated with the administration of its requirements under the GGPPA and EPS Regulation;
- (f) Enbridge Gas's forecast cost associated with Company Use Volumes for the period of April 1, 2022 to March 31, 2023;
- (g) Enbridge Gas's forecast 2022 cost associated with EPS Volumes;
- (h) Potential options for reducing Enbridge Gas's facility-related emissions and associated costs; and
- (i) 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	Ian Jarvis, President	Gillian Henderson, Vice-President	Matthew Rutledge, Associate
Fogler, Rubinoff LLP	Enerlife Consulting Inc.	Enerlife Consulting Inc.	Fogler, Rubinoff LLP
77 King Street West	90 Eglinton Avenue East	90 Eglinton Avenue East	77 King Street West
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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*)
 Lawren Murray, OEB (*via email*)
 Richard Wathy, EGI (*via email*)
 Tania Persad, EGI (*via email*)
 Tyson Dyck, Torys (*via email*)
 Ian Jarvis, Enerlife (*via email*)
 Gillian Henderson, Enerlife (*via email*)
 Matthew Rutledge, Foglers (*via email*)
 Bala Gnanam, BOMA (*via email*)
 Susan Allen, BOMA (*via email*)