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VIA RESS AND EMAIL

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

Attention: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2022-0072: Consultation to Review Annual Update to Five-Year Natural Gas Supply Plan of Enbridge Gas Inc. – BOMA's Questions

BOMA is wholly supportive of the guiding principles and substance of the proposed Framework for the Assessment of Distributor Gas Supply Plans. The cost and security of gas supply are of critical importance to BOMA members during the transition to the low carbon future. These are unusual and unprecedented times.

BOMA's questions relate entirely to the Demand Forecast in the context of our expectation of substantial reductions in gas consumption in the Commercial Sector over the next two decades. Figure 8 from Enbridge's Application and Evidence serves to quantify the proportion of this sector in Ontario's total gas supply (seemingly around 20% in 2025) and indicates the volume increasing through to 2045. We appreciate and welcome that growth in population and the economy will occur over this period, however we anticipate that performance-based DSM and increasing electrification driven by the Commercial Sector's response to climate change and related government policy will cut the gas use intensity of commercial buildings by a far greater amount. Page 18 states that "In Ontario, gas use will increase at an annual average growth rate of 1.2% per year from 2021 through 2045. Demand from the residential and commercial sectors will experience annual modest growth of 1.47% and 0.97% respectively over the next two decades." While we cannot speak to efficiency improvements in residential and industrial sectors, BOMA expects that actual commercial sector demand will show negative growth over this period. We also anticipate the load profile of commercial sector gas use to become more weather sensitive as the larger share of efficiency improvements occur in non-peak periods.

BOMA 1 Re: Figure 8 page 18

1. Please break out the Commercial Sector demand forecast to 2045 showing effects of growth in building area, the economy and efficiency improvements.
2. Please estimate the impact (if any) on large commercial customers' bills and/or security of supply of a 2% annual demand reduction rather than the forecast 0.97% annual increase.
3. Please comment on aspects of the GSP which would be materially affected by this level of declining rather than increasing Commercial Sector demand.
4. Please provide the forecast growth in electricity demand from the Commercial Sector which is embedded in the Power Sector growth.

BOMA 2 Re: Page 13 para 6

“As part of EGI’s design day plan for each delivery area, regardless of rate zone, EGI only contracts for firm demand and plans on interruptible customers continuing to deliver their obligated supply, which EGI can use in lieu of purchasing gas supply and transportation services.”

1. Please estimate the current share of Peak Day Demand and percent reduction due to voluntary curtailment in commercial buildings.

Yours truly,

FOGLER, RUBINOFF LLP



Albert M. Engel

AME/dd