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Our File No. 225289

VIA EMAIL: registrar@oeb.ca

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Marconi:

Re: EB-2022-0200: Enbridge Gas Inc. 2024 to 2028 Rates Application

Enclosed are the Interrogatories of the Building Owners and Managers Association (BOMA).

BOMA acknowledges and appreciates the early filing of partial Interrogatories by the School Energy Coalition and Environmental Defence and has endeavoured to avoid replicating questioning posed by those two parties.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel

AME/dd
Encl.

CC: All Parties (*via email*)

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15 (Schedule. B);

AND IN THE MATTER OF an Application by Enbridge Gas Inc., pursuant to section 36(1) of the Ontario Energy Board Act, 1998, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2024.

**Interrogatories to Enbridge Gas Inc on behalf of
the Building Owners and Managers Association (BOMA)**

1.10-BOMA-1 [1-10-4]

Preamble: This section provides details on how Enbridge Gas has considered energy transition in the company's forecasted number of customers, average use, design day and design hour demand, and distribution contract customer demand.

Questions:

- a) Please provide Enbridge Gas' (EGD and Union combined) consolidated history and forecast of annual, design hour and design day gas demand for each year from 2018 until 2028 for the commercial, residential and industrial sectors and the whole system.
- b) Please provide EGI's history and current forecast of annual, design hour and design day gas demand savings due to DSM for each year from 2018 until 2028 for the commercial, residential and industrial sectors and the whole system.
- c) Please provide EGI's current forecast of annual, design hour and design day gas demand savings arising from the Energy Transition Scenario Analysis for each year from 2024 until 2028 for the commercial, residential and industrial sectors and the whole system.
- d) Please file a copy of any studies estimating the potential for annual, design hour and design day gas use reductions due to ventilation heat recovery in commercial buildings conducted by EGI or which EGI is aware of.
- e) Please file a copy of any studies estimating the potential for annual, design hour and design day gas use reductions due to modified unoccupied space temperature setback in commercial buildings conducted by EGI or which EGI is aware of.
- f) Please file a copy of any studies estimating the potential for annual gas use reductions due to application of heat recovery chillers in commercial buildings conducted by EGI or which EGI is aware of.

- g) Please file a copy of any studies or reports on year over year INCREASES in weather normalized gas use in commercial buildings, which are unexplained by known changes in building use, occupancy or operations, conducted by EGI or which EGI is aware of.
- h) Please confirm that QRAM fully trues up for all variances between forecast and actual annual gas prices and volumes and that EGI does not benefit in any way financially from such variances.

3.2-BOMA-2 [3-2-8 attachment 1]

Question:

Please provide the breakdown of total (EGD + Union) Distribution Contract numbers of customers and gas volumes between commercial and industrial customers.

2.6-BOMA-3 [2-6-2 section 5.1]

Preamble:

Distribution System Reinforcement projects involve the installation or modification of existing gas distribution assets to maintain minimum required system pressures, maintain distribution capacity and meet growing natural gas demands. These projects are primarily driven by increased customer demand, customer growth and system reliability considerations. The IRP Assessment Process is used to evaluate the preferred solution to meet the specific system needs.

Question:

Please describe how IRP considers the potential for reductions in gas demand due to DSM and/or DER when evaluating investments in distribution system reinforcement.

8.2-BOMA-4 [8.2.1]

Question:

Please confirm that the proposed rate harmonization is revenue neutral for EGI.

1.10-BOMA-5 [1.10.7].

Question:

Energy Transition Technology Fund: Please describe the proposed governance and decision-making process for identifying, qualifying and prioritizing potential projects and expenditures.

1.10-BOMA-6 [1.10.2 page 4]

Preamble:

Enbridge Gas's system consistently fulfills these critical energy system needs because of its:

c) System storage capacity, via underground storage facilities and via 'linepack'¹⁰ in the gas transmission system.

Questions:

- a) Please provide EGI's total gas storage capacity in terms of volume Mm³ and days of supply under design day conditions.
- b) Please describe how much of this capacity is allocated/available to the commercial buildings sector.