

BY EMAIL and RESS

January 28, 2025

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

Dear Ms. Marconi:

EB-2024-0198 Enbridge Gas Inc. ("Enbridge") 2026-2030 DSM Plan Application - Building Owners and Managers Association's (BOMA) Response to Enbridge's Submissions on Intervenor Status Requests

I am writing on behalf of BOMA in response to Enbridge's January 21, 2025 letter related to intervenor status requests, in which it requests BOMA to provide further details and information in respect of its intervention request.

In its January 21, 2025 letter, Enbridge requests BOMA to provide further information in two areas:

1. Governance structure in respect to how BOMA's representatives at Ontario Energy Board (OEB) proceedings are instructed (including submissions and positions that are taken) and how/if other BOMA chapters across the province are informed; and
2. Commercial and financial interests of its representatives.

Governance structure

BOMA has two independent associations in Ontario – BOMA Toronto and BOMA Ottawa. Enerlife Consulting ("Enerlife") reports to BOMA Toronto. BOMA Toronto, through proactive advocacy, a comprehensive education program, mentorship and networking, connects a membership of managers, developers and suppliers that represent over 80% of the industry in Toronto and the Greater Toronto Area. BOMA Toronto represents Greater Toronto Area commercial building owners' and managers' interests in government policy and regulatory issues.

Enerlife provides (and seeks feedback from) BOMA Toronto senior management monthly regulatory updates (and other impromptu updates) including a list and latest status of OEB proceedings we participate and the purposes of intervention.

Commercial and financial interests of its representatives

Since 2001, Enerlife has been conducting energy efficiency and decarbonization planning, programs, engineering and advisory services, as well as applied research, for commercial building owners and managers, and for governments and utility companies in Ontario, across Canada and in the United States. The breadth, depth and specialization of our work provide extensive insight, practical experience and documented performance outcomes. These qualifications form the basis on which BOMA Toronto chose us to represent their members' interests in government policy and regulatory proceedings.

Enerlife makes extensive use of commercial sector electricity and natural gas conservation incentive programs in the best interests of its clients, including BOMA Toronto, with no commercial or financial bias towards Pay for Performance or any other program. Enerlife has particular expertise in data analytics for setting empirical energy savings targets and demonstrating actual savings achieved over time. This includes insight into the nature and magnitude of operational savings potential in commercial buildings. Enerlife advised the Independent Electricity System Operator on its Energy Performance Program, and Enbridge Gas on design of the Pay for Performance program prior to the previous DSM proceeding. Enbridge Gas then selected Enerlife through a competitive process to manage the pilot project which is now in its third year.

BOMA Toronto has not yet taken a position on Pay for Performance relative to other proposed programs in this Enbridge DSM Application and will represent its members on all aspects of the Application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clement Li".

Clement Li

Director, Policy & Regulatory Development

Enerlife Consulting Inc.

cli@enerlife.com