

BY EMAIL and RESS

March 13, 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 –
Additional Comments from Building Owners and Managers Association Toronto (BOMA)
on Draft Issues List**

Pursuant to the Ontario Energy Board's Procedural Order No. 1, I am writing on behalf of BOMA to provide additional comments on the Draft Issues List.

After reviewing parties' initial submissions filed on March 7, 2025, BOMA has the following comments:

Draft Issues 7 and 6:

In their March 7, 2025 submission, Environmental Defence Canada (EDC) and Green Energy Coalition (GEC) request that an amendment be made to issue 7 to clarify that Enbridge is not the only party that may propose updates to the DSM Framework. EDC and GEC also point out that it may not be necessary to have issue 6 as a separate issue – as the appropriateness of electrification/fuel switching is already subsumed in other issues (i.e. issues 1, 2, 3, 4 and 12). BOMA support their rationale and submits that issue 7 should be revised to "7. Is the proposed DSM Framework appropriate?", and issue 6 should be removed.

Draft Issue 1:

In its March 7, 2025 submission, Enbridge recommends that the words “integrated planning” should be removed from issue 1, based on two reasons:

- i) If the words “integrated planning” are meant to refer to integrated resource planning (IRP), then it is already subsumed in issue 17 and therefore should be removed from issue 1.
- ii) If the words “integrated planning” are meant to refer to “long-term integrated planning” related to the broader energy transition, then DSM plan is just a subset of this broader plan/framework and these words should be removed from issue 1.

BOMA interprets the words “integrated planning” as “long-term integrated planning” related to the broader energy transition (as described in the Minister of Energy and Electrification’s December 19, 2024 Renewed Letter of Direction to the OEB). BOMA believes Enbridge’s 2026-2030 DSM Plan can have a significant impact on long-term integrated planning and energy transition and therefore it is important and necessary to examine whether this plan adequately supports long-term integrated planning in accordance with the policies of the Government of Ontario, including having regard to consumers’ economic circumstances in this proceeding. As such, BOMA submits that no change is necessary for draft issue 1. Alternatively, the OEB may wish to provide further clarity by replacing the words “integrated planning” by “long-term integrated planning” in issue 1.

Sincerely,

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

Clement Li

Director, Policy & Regulatory Development

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