

BY EMAIL and RESS

June 27, 2025

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

Re: EB-2024-0111 Enbridge Gas Inc. 2024 Rebasing Phase 2 - Building Owners and Managers Association Toronto's (BOMA Toronto) Response to Enbridge Gas Inc.'s objection for BOMA Toronto's Cost Claim

I am writing on behalf of BOMA Toronto in response to Enbridge Gas Inc.'s (Enbridge) June 20, 2025 submissions on intervenor cost claims, in which it suggests BOMA Toronto's cost claim is excessive.

In its submissions, Enbridge measures BOMA Toronto's contribution in this proceeding by simply counting the number of interrogatory and technical conference questions, pages of argument and number of issues addressed. This leads to Enbridge's conclusion that the role of BOMA Toronto in this proceeding was "minor" and "minimal" and therefore our cost claim is excessive. This assessment is not correct.

BOMA Toronto is one of the most influential voices in the commercial real estate industry. Our members are large consumers of energy and they are directly impacted by the outcome of this proceeding. BOMA Toronto did not play a minor or minimal role as many issues in this proceeding affect commercial building owners and managers. BOMA Toronto supports regulatory efficiency and hence we took a focused and efficient approach throughout the proceeding. As such, we limited our participation only to issues that are most relevant to our members to avoid duplication of effort among intervenors.

Our interrogatory questions reflect our targeted areas of interest in this proceeding - performance measurement and scorecard, energy transition technology fund and asset life extension and system pruning. The number of hours claimed (lower than most other intervenors) properly aligns with our targeted approach.

BOMA Toronto spent considerable effort¹ developing technical conference questions pertaining to our areas of interest. However, during the conference, a significant portion of our questions and concerns in these areas were addressed by other intervenors before our turn. To avoid repetition, BOMA Toronto voluntarily skipped many questions and our actual questioning time was cut short.

All issues except three were settled in the settlement conference, in which BOMA Toronto fully participated. Our limited participation at the oral hearing and argument phase was deliberate as we focused on the remaining issue that was most relevant to its members – performance measurement and scorecard. We did not engage in the other two outstanding issues as they were already well covered by many other intervenors.

Enbridge labelling BOMA Toronto's role as "minor" and "minimal" at the interrogatory, technical conference, oral hearing and argument phase penalizes our effort to avoid repetition. Our relatively low claim hours appropriately reflect our effort to avoid duplication and to support regulatory efficiency.

In accordance with Section 5.01 of the Ontario Energy Board's (OEB) Practice Direction on Cost Awards, BOMA Toronto submits that throughout this proceeding, it has:

- (a) participated responsibly in the process;
 - BOMA Toronto's cost claim hours appropriately reflect its focused and efficient approach on effort and contribution. They are materially below the hours claimed by intervenors who addressed a wide range of issues during the proceeding and are comparable to the hours claimed by intervenors who focused their participation on limited issues.
- (b) contributed to a better understanding by the OEB of performance measurement and scorecard, energy transition technology fund and asset life extension and system pruning; and
- (c) made reasonable efforts to ensure that its participation in the process, including its evidence, interrogatories and cross-examination, was not unduly repetitive and was focused on relevant and material issues;
 - BOMA Toronto's focused engagement in the technical conference, oral hearing and argument confirm its endeavor to minimize duplication among intervenors and its support of regulatory efficiency.

¹ In BOMA Toronto's July 17, 2024 letter, we indicated that the time estimate for our questions during the technical conference to be 40 minutes.

As such, BOMA respectfully requests that the OEB approve its cost claim in full.

Sincerely,



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