

**BY EMAIL and RESS**

November 13, 2025

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

Dear Mr. Murray:

**EB-2025-0156 Consultation on the Regulatory Treatment of Local eDSM (Stream 2) Programs - Building Owners and Managers Association Toronto's (BOMA Toronto) Submissions**

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**Introduction**

On July 23, 2025 the Ontario Energy Board (OEB) issued a letter initiating a consultation on the regulatory treatment of electricity demand-side management (eDSM) programs delivered by local distribution companies (LDCs) that provide both local and system wide benefits. After attending the October 8/9 2025 stakeholder session and reviewing the IESO-LDC DSM Regulatory Working Group's June 11, 2025 Report (Proposed Framework for Implementation of Local eDSM Report) and its responses to stakeholders' clarifying questions, BOMA Toronto is providing the following comments.

**BOMA Toronto Submissions**

*General Comments*

BOMA Toronto supports local eDSM programs that target local distribution needs and support provincial energy system objectives in a coordinated, cost-effective manner. This initiative is consistent with recent Ministerial Directives. BOMA Toronto believes cost effective local eDSM programs that complement existing province-wide offerings will help optimize local (distribution level) and bulk (transmission and generation) electricity infrastructure, preparing the electricity grid for growth and electrification activities.

### Board Panel or Delegated Authority

The Working Group proposes a streamlined review process for Stream 2 applications under Delegated Authority. Under this approach, OEB staff would evaluate the completeness and correctness of the LDC's filing—verifying the cost-effectiveness tests (EST, DST) and cost-allocation split between distribution rates and the Global Adjustment, as well as confirming that the distribution need is substantiated. However, whether the OEB ultimately adopts Delegated Authority for all or part of these eDSM funding requests will depend on the outcome of the initial proceeding examining this policy proposal.

BOMA Toronto supports a streamlined and efficient review process under Delegated Authority. However, given this proposed review process is new and untested, the OEB may want to consider starting the process with Board Panel review only. Once the process is more understood, tested and becomes more mechanistic, then a Delegated Authority review process can take over to shorten timeline and improve regulatory efficiency.

### Distribution Rate Funded Portion of Program Costs

The Working Group proposes that the portion of Stream 2 program costs attributable to the distribution system is recovered through LDC rates, via an automatically approved eDSM Rate Rider.

BOMA Toronto submits that eDSM Rate Riders should not be automatically approved, without an LDC successfully demonstrating that the distribution system need to be deferred/avoided by the proposed local eDSM program is NOT already funded by existing distribution rates. This additional proposed step is necessary as it will minimize the risk of “double funding” that leads to unnecessary rate increases to LDC customers.

### Avoid Duplication of Effort among LDCs

Detailed local eDSM program information needs to be shared among all LDCs. Collaboration or joint local eDSM applications (from more than one LDC) should be encouraged to avoid duplication of effort among LDCs.

There are many LDCs in Ontario with similar conditions (e.g. density, climate, demographics, urban vs rural). Many could benefit from lessons learned from other LDCs with similar conditions and/or joint local eDSM applications.

DSM is very relevant to BOMA Toronto's primary policy interests, which include energy transition, electrification and conservation and demand management. As such, BOMA Toronto appreciates the opportunity to participate in this important OEB consultation. We would be delighted to participate in any local eDSM working groups, providing a voice for commercial property owners throughout the Greater Toronto Area and Ontario.

Respectfully submitted on behalf of BOMA Toronto,

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

**Clement Li**

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