

BY RESS

March 6, 2026

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

Dear Mr. Murray:

EB-2023-0125 Draft Phase Two Benefit-Cost Analysis Framework - Building Owners and Managers Association Toronto Comments

On October 20, 2025, the Ontario Energy Board (OEB) issued a letter launching its consultation on Phase Two of the Benefit-Cost Analysis (BCA) Framework. Phase Two builds on Phase One by refining the Energy System Test and considers extending the Framework to include societal impacts associated with non-wires solutions (NWS) investments. The proposed Phase Two changes also make the Energy System Test (EST) mandatory. The February 6, 2026 OEB letter confirms release of the draft revisions and invites parties to submit comments on the draft Phase Two revisions to the Framework.

Please find attached BOMA Toronto's comments pertaining to the above referenced matter.

Sincerely,



Clement Li

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EB-2023-0125 Draft Phase Two Benefit-Cost Analysis Framework

Building Owners and Managers Association Toronto Comments

FOCUS QUESTIONS

Non-Energy Benefit (NEB) Adder

Do you support the proposed approach to incorporating societal impacts through the application of an NEB adder for electricity conservation and electricity demand-side management (eDSM) NWS? Do you support the proposed NEB value of 15%? Please provide your rationale.

BOMA Toronto comments:

BOMA Toronto supports the proposed approach to incorporating societal impacts through the application of an NEB adder for eDSM NWS. This is consistent with BOMA Toronto's submission in the draft Phase One BCA Framework, where we recommended the inclusion of environmental benefits in the BCA calculations.¹ The inclusion of NEB is also consistent with the cost-effectiveness tests for both natural gas DSM Framework and eDSM programs delivered by the Independent Electricity System Operator (IESO).

We believe the proposed NEB value of 15% is a good starting point. It is consistent with the NEB adder in the natural gas DSM Framework and the IESO eDSM programs. However, BOMA Toronto submits that further studies or examinations (e.g. two years after implementation of the initial 15% value) would help establish a more appropriate NEB value, as the energy transition in the sector continues to unfold, and with more data from NWS adoption becomes available.

Energy System Test (EST)

Do you support the proposed requirement for collaboration between electricity distributors and the IESO to ensure more accurate and consistent completion of the EST? Please provide your rationale.

Do you support the proposed revision to make the EST mandatory? Please provide your rationale or explanation for your position.

¹ EB-2023-0125 Draft Phase One Benefit-Cost Analysis Framework – Building Owners and Managers Association Comments, filed February 1, 2024.

BOMA Toronto comments:

BOMA Toronto supports the proposed revision to make the EST mandatory. This is consistent with our submission in the draft Phase One BCA Framework, where we recommended that EST should be mandatory.² BOMA Toronto believes the BCA Framework should consider all components of customer savings, which include avoided distribution, transmission, energy and generation capacity costs and non-energy benefits to optimize the long-term net benefit of the energy system to all provincial customers.

BOMA Toronto supports the proposed requirement for collaboration between electricity distributors and the IESO. Mandatory collaboration between electricity distributors and the IESO is a must to ensure accurate and consistent EST completion, given the great complexity and variability of the different distribution systems in Ontario.

Other Considerations

Do you believe the BCA Framework (in whole or in part) would benefit from further clarification or usability improvements? If so, please identify the applicable sections and briefly describe how they could be improved.

BOMA Toronto comments:

This BCA Framework supports and informs several OEB initiatives that align with the Ontario's Integrated Energy Plan (IEP), such as EB-2025-0156 - Consultation on the Regulatory Treatment of Local Electricity Demand-side Management (Stream 2) Programs, EB-2025-0060 - Distribution System Operator Capabilities Consultation and others. These consultations are interconnected and the OEB may consider a more integrated approach to addressing BCA framework for NWS. Considering these topics in a holistic fashion will provide all stakeholders with a clear and comprehensive understanding of the framework. This OEB is already using this approach in EB-2026-0002 - An Integrated Approach to Utility Remuneration – Next Generation Rate Framework, where a number of related OEB initiatives are brought together under a comprehensive policy consultation.

² EB-2023-0125 Draft Phase One Benefit-Cost Analysis Framework – Building Owners and Managers Association Comments, filed February 1, 2024.