

BY EMAIL and RESS

March 30, 2026

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

Dear Mr. Murray:

EB-2025-0295 Enbridge Gas Inc. (“Enbridge”) 2027-2030 Demand Side Management (DSM) Plan Application - Building Owners and Managers Association Toronto (BOMA Toronto) Supplemental Submissions on Draft Issues List

Pursuant to the Ontario Energy Board (OEB) Procedural Order No. 2, BOMA Toronto provides the following comments on whether the consideration of a cost of carbon for DSM cost-effectiveness testing should be within the scope of this proceeding, and added to the Issues List.

BOMA Submissions

In its March 9, 2026 written submissions and March 12, 2026 oral submissions, BOMA Toronto recommended that the consideration of a cost of carbon for DSM cost-effectiveness testing should be within the scope of this proceeding and be added explicitly to the issues list. After attending the March 12, 2026 Issues Conference and reviewing Enbridge and other parties’ submissions on this matter, BOMA Toronto submits that its position on this matter remains unchanged.

“Setting a Carbon Tax” versus “Including a Cost of Carbon in a DSM Cost-Effective Test”

Other parties in their submissions have pointed out (and provided rationales) that while the OEB clearly can not approve a carbon tax, its jurisdiction clearly includes considering environmental and other non-financial factors, such as the cost of carbon in its decisions. BOMA Toronto agrees.

Consistent with EB-2024-0198 Enbridge Gas 2026 DSM Plan – OEB Decision

Including the consideration of a cost of carbon for DSM cost-effectiveness testing in this proceeding is consistent with the OEB's direction in its EB-2024-0198 – Enbridge Gas 2026 DSM Plan Decision, issued on November 6, 2025, where it stated:

“The OEB provides the following directions regarding the evidence of Enbridge Gas in support of its 2027+ multi-year DSM plan application:

(1) In its evidence on cost-effectiveness, Enbridge Gas shall address how the economic cost of carbon should be reflected in the TRC-Plus analysis of the programs it will propose in its upcoming updated DSM plan application with full supporting rationale. ”

As such, BOMA Toronto submits that the consideration of a cost of carbon for DSM cost-effectiveness testing should be within the scope of this proceeding, and added to the Issues List.

Sincerely,

A handwritten signature in black ink that reads "Clement Li".

Clement Li

Consultant for BOMA Toronto
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