

BY EMAIL and RESS

May 12, 2026

Mr. 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's Proposal to file Expert Evidence

I am writing pursuant to Procedural Order No. 3 to inform the Ontario Energy Board (OEB) of Building Owners and Managers Association Toronto's (BOMA Toronto) proposal to file expert evidence in the above noted proceeding.

Proposed Evidence

BOMA Toronto has retained Enerlife Consulting (Enerlife) to prepare evidence in three areas, derived from publicly available energy use data, to inform this proceeding. This evidence aims to inform and improve program design by pointing to subsectors of commercial building types with the greatest opportunities for savings, as indicated through provincial benchmarking. Evidence will be provided showing how expected gas savings levels can be higher without significant cost increases, thereby improving the cost effectiveness of commercial sector DSM programs. The evidence will also point to the need for a program to reduce gas demand in new buildings incorporating verified results.

1. **Actual gas (and electricity) savings achieved from 2019 to 2024, and from 2023 to 2024, for Ontario's commercial buildings.** These trends would be obtained by weather normalized analysis of the Ministry of Energy's Broader Public Sector (BPS) and Energy and Water Reporting Benchmarking (EWRB) public databases, which require annual reporting by all public and private sector commercial buildings, respectively. The results would show actual overall reductions in energy use for the commercial sector, to help parties evaluate the impact of commercial sector DSM

programming since pre-COVID baselines. Disaggregated results would indicate which market segments are performing better or worse, to help focus attention on areas of opportunity. Individual building results, showing how many buildings in each market segment achieved what percent savings (or increases) over time, could guide further research by Enbridge into effectiveness of individual offerings, and help identify additional programming opportunities.

2. **The nature and scale of low-cost operational savings potential in commercial buildings.** Results from Save on Energy existing building commissioning (EBCX) projects, BOMA Enspire and other programs in several commercial building segments are demonstrating double digit percentage gas savings, far higher than had previously been forecast. Many of these low cost, highly cost-effective measures, including scheduling of heating, ventilation and air conditioning (HVAC) systems, are yielding similar magnitudes of both gas and electricity savings. The details of these results could inform Enbridge’s proposed new EBCX program and possible areas of cooperation with the Independent Electricity System Operator (IESO).
3. **Actual operating energy performance of new commercial buildings.** The national research project, funded by Natural Resources Canada (NRCan) through the Codes Acceleration Fund, includes a large number of Ontario’s office, school, hospital and municipal community centre buildings opened since 2015. Findings show a few with exceptional energy efficiency, but a majority fail to meet today’s energy performance standards, often by a wide margin. Conclusions and recommendations identify process improvements, particularly in modeling, commissioning and facility operations. There is a need for utility company programs to support owners in managing the transition with Fortis BC’s Commercial New Construction Program cited as a positive current example. A summary of findings and conclusions could inform consideration of a new, performance based new commercial construction incentive program.

Enerlife has direct involvement in these three areas of work, with the analytical methodology and tools to produce the required reports. The project lead for this work would be Ian Jarvis, P.Eng, president of Enerlife Consulting, with support from Marc Madi, P.Eng, senior energy performance analyst of Enerlife Consulting.

The proposed evidence is most relevant to issues 6¹ and 13², as it will discuss historical natural gas savings in different commercial building types, and the highly cost-effective operational savings potentials.

¹ Issue 6 – Is Enbridge Gas’s proposed DSM Plan term of 2027-2030 appropriate?

² Issue 13 – Has Enbridge Gas proposed an optimal suite of program offerings that is responsive to the DSM Framework’s objectives and guiding principles?

Experience of Ian Jarvis (lead)

Mr. Jarvis is a leading expert on energy use and conservation in commercial buildings. His practice includes conservation potential studies and reporting on actual annual savings and emissions reductions achieved in Ontario's commercial building segments and in other jurisdictions across North America with publicly reported utility data. He leads development of multi-year conservation plans for major building owners and sectors including commercial landlords, Alberta hospitals, Ontario schools and colleges and New York State's nursing homes. A practising professional engineer, Mr. Jarvis also brings experience of hands-on engineering for retrofits and recommissioning projects in all types of commercial buildings.

For more than three decades, Mr. Jarvis has worked for building owners, utilities and governments across Canada and in the United States. He has advised the Government of Canada as a member of the National Advisory Council on Energy Efficiency as well as the governments of Ontario and Nova Scotia on expert panels. He has provided expert testimony to the OEB in previous proceedings related to natural gas rates, pipeline expansion and Demand Side Management (DSM) programming (most recent proceeding: EB-2022-0200 Enbridge Gas Inc. Rebasing Application).

Mr. Jarvis was the founding chair of the Canada Green Building Council, represents the Building Owners and Managers Association in Ontario Energy Board proceedings, has authored many case studies, reports and peer reviewed white papers and is a frequent public speaker on energy efficiency policy, programs, strategy and market dynamics related to decarbonization and progression towards net zero emissions in commercial buildings. Mr. Jarvis' CV is attached.

Experience of Marc Madi (support)

Mr. Marc Madi is an experienced mechanical engineer bringing over 20 years of mechanical lead experience. He has led over 40 building design/performance projects in commercial and institutional facilities. He is well immersed in high-performance building systems across institutional and commercial sectors, specializing in HVAC design, building energy performance, and decarbonization of existing and new buildings. His work spans energy analytics, life-cycle costing, and system optimization, with a focus on improving real-world building performance, reducing performance gaps between design and operation, and enabling cost-effective pathways to electrification and emissions reduction in public infrastructure. Mr. Madi is a Project Management Professional, a Certified Energy Manager and a Leadership in Energy and Environmental Design (LEED) Green Associate. Mr. Madi's CV is attached.

Budget

BOMA Toronto estimates that this expert report will cost \$40,000 to prepare. The cost for interrogatory responses, a technical conference and hearing and responding to any additional undertakings will be in addition to that amount. It is difficult to predict such additional costs because they depend primarily on the actions of other parties. Based on previous experience, time for such additional steps beyond the preparation of evidence may add an additional 40% to the costs.

BOMA Toronto estimates the incremental counsel costs required in relation to the preparation and presentation of the proposed evidence will be between \$4,000 and \$10,000.

Conclusion

The proposed evidence will provide insights into natural gas usage trends across commercial building segments. This empirical, data-driven analysis highlights the gas savings potential of cost-effective operational optimization measures and may help identify additional program opportunities. BOMA Toronto submits that this evidence will assist the OEB and intervenors in evaluating the cost-effectiveness and applicability of Enbridge's 2027–2030 DSM Plan.

Sincerely,

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

Clement Li

Consultant for BOMA Toronto
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