

BY EMAIL and RESS

May 21, 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. 2027-2030 Demand Side Management Plan
Application - Building Owners and Managers Association Toronto Interrogatories to
Applicant**

Enclosed are the Interrogatories of the Building Owners and Managers Association
Toronto (BOMA Toronto).

Sincerely,



Clement Li
Consultant for BOMA Toronto
Director, Policy & Regulatory Development
Enerlife Consulting Inc.
cli@enerlife.com

**EB-2025-0295 Enbridge Gas Inc. (Enbridge Gas)
2027-2030 Demand Side Management (“DSM”) Plan Application**

**Interrogatories to Enbridge Gas Inc. on behalf of
the Building Owners and Managers Association Toronto (BOMA Toronto)**

A-BOMA-1

References:

1. [Ex. A-2-2, Table 1, page 2]

Questions

- a) In reference #1, Enbridge Gas’s proposed procedural timeline has OEB staff and intervenors filing interrogatories by mid-February 2026. We are currently about three months behind the original timeline. Please provide a revised proposed procedural timeline.
- b) Please discuss how this revised timeline will impact DSM program continuity for customers as of Q4 2026.

B-BOMA-2

References:

1. [Ex. B-1-1, Table 1, page 6]
2. [EB-2021-0002 - OEB Decision and Order, November 15, 2022, page 4]

The OEB expects that, at a minimum, the level of natural gas savings from DSM programs during the next multi-year term will be the equivalent of at least 0.6% of sales in 2026, 0.8% of sales in 2027 and 1.0% of sales in each year from 2028 through to the end of 2030, relative to the prior year on a weather normalized basis....

3. [Ex. D-1-1, page 2]
4. [Ex. D-3-1, Tables 1 to 4, pages 2 to 5]

Preamble:

In reference #1, Table 1 displays the total natural gas savings for the 2027-2030 DSM Plan portfolio, and the total natural gas savings as a percentage of forecasted natural gas sales. The percentage savings increase from about 0.5% in 2027 to about 0.6% in 2030. These expected savings are lower than the OEB's expectation in its last Decision and Order, which is stated in reference #2.

In reference #3, "*Deliver Affordable and Cost-Effective Natural Gas Savings*" is listed as the number one priority of the 2027-2030 DSM Plan.

Questions

- a) Did Enbridge Gas perform any scenario and sensitivity analysis of any alternate 2027-2030 DSM Plan(s) that would result in higher overall cost effectiveness? If yes, please provide a copy of this analysis and the detailed reasons why these alternative DSM plans with higher overall cost effectiveness were not chosen.
- b) Does Enbridge Gas agree that a 2027-2030 DSM Plan with higher overall cost effectiveness could result in gas savings percentages that are closer to the OEB direction in the EB-2021-0002 OEB Decision and Order (when compared to the 2027-2030 DSM plan currently proposed by Enbridge Gas)?
- c) The commercial and industrial custom programs, prescriptive direct install programs and prescriptive upstream programs (as shown in reference #4) consistently have very positive TRC-Plus ratios. Does Enbridge Gas agree that allocating more budget to these highly cost-effective programs will increase the overall DSM Plan cost effectiveness?

C-BOMA-3

References:

1. [Ex. C-1-1 page 2]

It is important to note that any material changes to the DSM Framework as a result of this proceeding, beyond the modifications being proposed by Enbridge Gas, will likely require the Company to reconsider and potentially revise its 2027-2030 DSM Plan Application.

Questions

- a) What qualifies as "material changes to the DSM Framework"?

C-BOMA-4

References:

1. [Ex. C-1-5 Attachment 2, page 1]

...BOMA encourages Enbridge to seek out and assign high priority to cost-effective programs through additional consultation with the industry. BOMA believes a significant amount of savings can be achieved through very cost-effective DSM programs in the commercial sector...

... The commercial sector still has many "low hanging fruit", A large amount of natural gas and electricity savings can be achieved with highly cost-effective (low capital investment) commercial sector DSM programs. Priority should be based on cost effectiveness and amount of achievable potential savings. In order to achieve GHG targets, it is vital to increase effort/priority/incentive for higher potential DSM programs.....

Questions

- a) As listed in reference #1, BOMA Toronto provided written feedback to questions posted in Enbridge Gas's 2024 stakeholder session. Did BOMA Toronto's written feedback have any material impact on Enbridge Gas's proposed 2027-2030 DSM plan? If yes, please provide further details. If not, please explain why.

C-BOMA-5

References:

1. [Ex. C-1-6, 1.3 Future Coordination, pages 7 to 8]

...For proposed commercial and industrial offerings:

Exploring collaboration opportunities with the IESO to increase awareness of the proposed Commercial Existing Building Commissioning ("EBCx") Offering among facility owners and managers. This collaboration would focus on educating stakeholders about the benefits of commissioning existing buildings through expanded campaigns and workshops aimed at increasing participation.....

...Exploring additional areas and opportunities, as appropriate. ...

2. [Ex. C-1-6, 2 Coordination with Other Parties, pages 9 to 14]

Questions

- a) Please provide further information about the collaboration opportunities with the IESO to increase awareness of the proposed Commercial Existing Building Commissioning (EBCx) offering.

- b) What other collaboration opportunities are Enbridge Gas considering with the IESO?
- c) In reference #2, Enbridge Gas describes its coordination with other parties, such as municipalities, federal and provincial governments and other gas utilities. Does Enbridge Gas have any plan to coordinate with large data centres (with large amount of waste heat) and district heating and cooling providers such as Enwave Energy and Markham District Energy? If yes, please provide further details. If not, please explain why.

D-BOMA-6

References:

1. [Ex. D-8-3, pages 2 to 6]

...Most projects will be selected through an open bid process,...

Questions

- a) Please provide further details of the selection criteria and internal governance of these open bid projects (beyond what is provided in “project selection” in pages 5 to 6).

E-BOMA-7

References:

1. [Ex. E-4-6, page 2]

...The EBCx Offering targets a 3-5% reduction (Based on outcomes of historical no-cost/low-cost offerings such as Run it Right) in natural gas consumption per participant, resulting in operational cost savings....

Questions

- a) Please provide the assumptions and calculations used to come up with the 3-5% reduction in natural gas consumption.