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January 16, 2023

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Our File No. 225289

VIA EMAIL: registrar@oeb.ca

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
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Dear Ms. Marconi:

Re: EB-2022-0200: Enbridge Gas Inc. 2024 to 2028 Rates Application

I am writing pursuant to Procedural Order #1 to describe and provide a cost estimate for the evidence that the Building Owners and Managers Association (BOMA) proposes to commission from Ian Jarvis of Enerlife Consulting Inc.

Overview

The proposed evidence would focus on the natural gas demand forecast for commercial buildings and significant changes to the system load shape arising from accelerated DSM and electrification over the period of this application and beyond. The evidence would present results of new modeling to quantify the impacts of the primary drivers of peak load reduction (ventilation heat recovery) and annual gas savings (DSM and heat pumps) in commercial buildings using the most recent empirical data. The results would explain and reconcile differences between forecasts in the Gas Supply Plan (demand growth) and Canada's 2030 Emissions Reduction Plan (significant reduction in demand) and would help inform decisions on Enbridge's capital planning and rate impacts for general service and contract customers.

Experience of Ian Jarvis

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 Ontario Energy Board in previous proceedings related to natural gas pipeline expansion and DSM programming.

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.

Proposed Evidence – Details

As noted above, the proposed evidence would focus on Ontario's natural gas demand forecast and load shape for the commercial buildings' sector over the period of this application and beyond. It will report on reasons for the current demand trajectory, and on the current programs and plans of commercial building owners which are shifting that curve downwards in line with Canada's Emissions Reduction Plan and Ontario's Environment Plan. The evidence will be particularly relevant to issue 3 (energy transition and IRP), issue 9 (volume forecast by rate class) and issue 51 (Energy Transition Technology Fund). It will examine the critical issues of system load factor (which will be reduced) and peak day demand (which is expected to remain relatively high), including options for addressing "the last mile" – the few coldest days when heat pump capacity is exhausted and all customers require heat, as they relate to aspects of the Phase 2 A issues (storage).

The evidence will comment on Enbridge's decarbonization pathways study, highlighting areas where the empirical data support or are inconsistent with assumptions and conclusions.

Interplay with Other Experts

We have reviewed the expert evidence that Board Staff propose to put forward and have determined that there would be no overlap. We have conferred with Environmental Defence and would coordinate Mr. Jarvis' evidence with that of Mr. Neme to avoid any possible overlap and ensure they complement each other in providing consistent and useful information to the Board.

Budget

Mr. Jarvis estimates that his expert report will cost \$30,000 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.

I estimate the incremental counsel costs required in relation to the preparation and presentation of Mr. Jarvis' evidence will be between \$4,000 and \$10,000.

Conclusion

We believe the OEB and intervenors would greatly benefit from the proposed evidence. The Energy Transition is already happening, and changes are coming quickly. Including the latest empirical data in this proceeding can help reach better decisions for 2024 and the term of this application and beyond.

Yours truly,

FOGLER, RUBINOFF LLP



Albert M. Engel

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