

April 11, 2007

Mr. Peter O'Dell Assistant Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street 27th floor Toronto, ON M4P 1E4

Re: <u>EB-2007-0031:</u> Review of Electricity Distribution Rate Design.

Dear Mr. O'Dell:

Following from your notice of March 30, 2007 the Building Owners and Managers Association of Greater Toronto (BOMA) wishes to indicate our interest in participating in the review by providing written comments on the staff discussion paper, and participating in future consultations

Also, BOMA hereby requests consideration for cost award eligibility with this initiative.

The Building Owners and Managers Association is an international organization of 18,000 commercial real estate professionals. BOMA Toronto, with a network of over 750 members, represents the association in the Greater Toronto Area. BOMA has consistently represented the voice of large commercial energy consumers in Ontario.

BOMA directly represents the views of the largest single class of customers paying electricity distribution charges. Our volunteer Strategic Energy Committee operates to develop policy and solicit input from our broader membership on energy matters affecting them. With this structure we provide for a robust and inclusive representation of the views of the large commercial electricity consumers.

By participating in this initiative BOMA's general interests would be to ensure equity and fairness between customer classes in the design of distribution rates, while exploring new rate design features that encourage the broader development of energy conservation and demand response initiatives.

As a not for profit entity, BOMA undertakes to serve its members utilizing volunteer committee work to the greatest extent possible. However participating in more substantive initiatives, such as involved here, would require us to engage outside consultants, the cost of which are not included in BOMA's operating budget.

The credentials of our designated expert consultants, Mr. William Houston of Energy Advantage Inc. and Mr. Michael McGee of Energy Profiles Limited are attached.

Yours truly,

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Chuck Stradling Executive Vice President BOMA Toronto