

Sent to the City of Toronto's Infrastructure and Environment Committee on November 28, 2023

**Enbridge Gas Inc Response to City of Toronto's Proposed Building Emissions Performance Reporting By-Law Re: ITEM IE9.5**

Enbridge Gas Inc. (Enbridge) wishes to provide comment to the City of Toronto (the City) on the proposed Building Emission Performance Reporting By-law. Enbridge understands the City's goal is to reduce emissions from existing buildings with an ultimate target of achieving net zero emissions by 2040, and an interim target of cutting emissions nearly in half by 2030, relative to 2008 levels.

As noted in the IE9.5 notice, the City intends to work with utility providers to enable automatic uploading of information into Energy Star Portfolio Manager reporting tool. Enbridge notes that the City plans to work with utilities to ensure a streamlined reporting process, especially for smaller buildings (929 to 4,645 square meters in size). Upon an initial review of the by-law and Enbridge's existing processes and procedures, Enbridge offers the following comments to the City on the proposed by-law:

- Enbridge has a legal obligation to protect privacy and confidentiality of our customers, under the Gas Distribution Access Rule (GDAR) and Privacy regulations. Building owners are not always Enbridge customers and are usually third parties with whom we cannot share customer information.
- Increased automation and additional coverage of buildings will require upgrades to our systems and additional resources to support the process. As a rate regulated utility, we do not have any ability to recover these costs. Our current approved Demand Side Management (DSM) plans do not have provisions to cover costs for upgrading our IT systems nor the increase in resources for ongoing support.
- When designing our Energy and Water Reporting and Benchmarking (EWRB) solution, we had extensively reviewed options to allow for direct upload into the Portfolio Manager Reporting tool (PM). We concluded that direct upload to PM made our EWRB process more complex for the requestors. Direct upload to PM also had a higher risk of generating inaccurate aggregate consumption for buildings and added significant costs to the solution.
- As the City is aware, we provide gas distribution services across Ontario and our processes will remain simple and consistent if energy reporting requirements can remain the same across Municipalities. Enbridge recommends that the City leverages the process established for the EWRB regulation. Our EWRB process allows requestors to define their building using just their building addresses and our solution generates a consumption report ready to upload into PM. The report we generate for EWRB is aligned with the upload format required for PM, making it very easy for reporters to upload into PM.

Enbridge would be pleased to discuss these comments further with the City and explore options that would render reporting requirements streamlined and efficient for all involved.

Thank you,

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