**About Enerlife Consulting Inc.** [www.enerlife.com](http://www.enerlife.com)

Based in Toronto, Enerlife Consulting Inc. is a North American leader in energy efficiency for commercial, institutional and multi-residential buildings. We monitor energy use data for thousands of buildings in Ontario, across Canada and the United States and in Europe. We work with hundreds of building owners, including commercial offices, school boards, hospitals and municipalities, applying data analytics to identify energy efficiency measures, implement improvements and verify savings. We are responsible for a growing number of buildings which are among the most energy efficient in North America.

Enerlife is also leading the low carbon energy transition for commercial buildings. We have documented the necessity to first achieve high levels of energy efficiency in order to make decarbonization and electrification affordable. We have shown that most commercial buildings can displace a substantial portion of fossil fuel combustion without adding demand to the electrical grid.

Enerlife represents the Building Owners and Managers Association (BOMA) in regulatory hearings at the Ontario Energy Board (OEB). We have a multi-year contract with NRCan to document actual energy efficiency of recently opened buildings across Canada, and to recommend code and process improvements to deliver consistently high energy performance for new construction. We advise Enbridge Gas and the Independent Electricity System Operator (IESO) on energy efficiency program design. We freely share our latest knowledge and data through workshops and webinars attended by hundreds of people each year.

As such, Enerlife has unique influence, knowledge and insight into actual energy trends in the commercial building sector, the characteristics of high energy performing buildings, electricity and natural gas load forecasting, and the nature and magnitude of the real energy savings potential.

**Consultation Questions**

* *What role should natural gas play in supporting energy affordability and customer choice in residential and small commercial applications (e.g., space and water heating)?*

We only speak for commercial buildings. Natural gas always has and will continue to play a vital role in supporting energy affordability and customer choice in space and water heating applications in the near/medium term of energy transition. Currently, in most cases, full electrification of space and water heating in buildings is not economically feasible and/or not possible (limited electricity grid capacity). Therefore, conservation and hybrid heating (use both natural gas and electricity) is a sensible and economic way to decarbonize and reduce emission. For the most part, customers will continue to need access to natural gas as it is part of the hybrid heating solution. Natural gas polices need to result in a reliable, cost effective and accessible natural gas network for customers in the near/medium term of energy transition.

In the longer term, i.e. when there are significant technology advancements (e.g. solar, geothermal, storage…) and when the electricity grid has built up enough capacity, natural gas’ role in space and water heating will eventually decline as full electrification takes place – but we are not close to being there yet.

Conservation is the first key step to energy transition, and integration of electricity and natural gas efficiency programs is needed for a successful provincial conservation framework. Integrated (natural gas and electricity) program design and delivery will maximize efficiency and effectiveness while reducing program delivery costs and customer administrative burden. Natural gas and electric integrated resource planning (IRP) programs are needed to avoid large, unnecessary capital expenditures on energy infrastructure during the energy transition. IRP needs to be a fully integrated process that involves all key parties, including the IESO, electric utilities (both transmitters and distributors), natural gas utilities, all levels of government, district heating & cooling providers and customers.

* *What role should natural gas play in supporting power system security and resiliency?*

This is a critical issue for commercial buildings, along with reliability. We are very familiar with the challenges faced by building owners in jurisdictions where the grid has not kept up with growing demand, including New York City. We have not analyzed the options, but believe in the IESO’s conclusion that natural gas will continue to play an important role in supporting electricity power system, at least over the next 15 years. As the energy transition unfolds, demand for electricity will continue to increase. Grid resiliency will become more important as climate change leads to storms and outages, and customers’ reliance on electricity increases.

* *What role should natural gas play in offsetting higher GHG-emitting fuel sources?*

The use of oil and propane for commercial building space and water heating should be phased out as soon as possible. To replace the use of oil and propane, first choice is to incentivize heat recovery (for example using ice plant heat in arena facilities), then heat pumps including geothermal, with natural gas as the last resort.

* *What are the challenges and opportunities for enhanced energy efficiency, adoption of clean fuels (e.g., RNG, Hydrogen) and emission reduction methods (e.g., carbon capture and storage) to lower emissions in the natural gas system?*

Enhanced energy efficiency -There is a very big, so far largely untapped potential for highly cost-effective natural gas conservation programs (through operations and maintenance improvements) for commercial buildings, which can be used to lower emissions. This untapped potential is substantially understated in the recently issued 2024 natural gas achievable potential study and also not properly addressed in Enbridge Gas Inc.’s proposed 2026-2030 Demand Side Management (DSM) Plan.

Adoption of clean fuels such as RNG and Hydrogen - Our secondary research indicates there will not be anywhere close to enough RNG to meet peak day demand for all the North American jurisdictions which will be competing for it. Technology could advance in the next decade, but we are not pinning much of our hopes on RNG. Likewise for green hydrogen. Nonetheless, maintaining enough of the natural gas system to make use of what is available is prudent.

Emission reduction methods such as carbon capture and storage (CCS) – We cannot find research indicating favourable CCS opportunities in Ontario where there are concentrations of commercial buildings (i.e. cities). If there are any we should invest in district energy systems to take advantage of them.