



January 20, 2017

British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street  
Vancouver, BC  
V6Z 2N3

**Attention: Ms. Laurel Ross, Acting Commission Secretary and Director**

Dear Sirs/Mesdames:

**Re: Order Number G-191-16  
In the Matter of the Utilities Commission Act, RSBC 1996 and Class Exemption for  
BC Hydro Customers that Resell Electricity under Certain Lease Arrangements**

Onni Group ("Onni") has registered as an intervenor in the process arising from Order G-191-16.

Based in Vancouver, Onni is one of North America's leading private real estate development and investment companies with over 340 employees. These are the submissions of Onni in response to the Commission's questions set out at page 2 of Order G-191-16.

#### Background on Onni

Onni has over 40 years of experience in real estate development in Vancouver, Edmonton, Toronto, Chicago, Los Angeles, Phoenix and Seattle. Onni is a vertically integrated entity which undertakes all of its own property management, construction, permitting, sales and marketing, thereby allowing complete control of the development process. Onni is building five master planned mixed use communities within areas that it is active and it owns or manages over 9,400,000 square feet of commercial and industrial space, 4,000 rental units and two hotels. Onni has delivered over 10,000 residential units over the past decade and has 4,400 units under construction, including high density, mixed use developments.

Onni develops, constructs, owns and manages property with a long term vision with a focus on customer service including ensuring safe and reliable energy services. Onni has a commitment to building and managing energy efficient buildings and to carbon footprint reduction.

As energy efficiency increasingly raises in importance in British Columbia, Onni has paid particular attention to compliance and contributions to the *Clean Energy Act* and has become more actively involved in understanding the regulatory environment for energy in British Columbia.

## Onni's Responses to the Commission's Questions

### Question 1 – Should this proposed class exemption be granted?

Onni fully endorses the Commission's proposed class exemption as contributing to both regulatory efficiency for the Commission in terms of not having to deal with exemption applications on a one-off basis, and also as recognition of the value that developers and property managers such as a Onni can bring to the energy efficiency and regulatory efficiency equation.

### Question 2 – If so, are the terms and conditions proposed in the draft exemption order satisfactory?

Onni is generally in support of the terms and conditions proposed in the draft exemption order provided by the Commission. The exemption order will eliminate the requirement for developers such as Onni to make applications on specific projects for exemption creating regulatory costs to both Onni and to the regulator with such cost providing very minimal, if any benefit to consumers. In Onni's view, the protection granted in paragraph 2 of Appendix B of Order G-191-16 provides sufficient protection to tenants to access the Commission's review in the event that there has been treatment of a tenant which justifies the Commission being involved.

Onni also supports the utilization of the approach supported by the Commission in approving the exemption for the Templeton Designer Outlet Centre Limited Partnership ("Templeton LP") whereby Templeton LP was granted the opportunity to allocate charges to consumers based on the square footage of the property leased by the tenant, as opposed to metering each individual tenant. Avoidance of the cost of metering equipment would potentially be of benefit to both end use customers as well as the developer or controller of the property and the utilization of square footage as an allocator for energy costs is a fair and reasonable approach which would provide opportunity for the developer to invest in energy efficiency while insuring that rates for end use customers are not in excess of the price which BC Hydro would charge as a tenant of BC Hydro.

Question 3 – Should any further regulatory process be held to consider this matter and why?  
And if so, what process should be held?

Onni submits that no further regulatory process is required and that the granting of the exemption is supportable based on the materials filed and the comments above. In the event that further process is required, Onni would be pleased to participate.

Onni appreciates the opportunity to provide these comments and supports the Commissions proactive approach to this issue

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Yours truly,

**ONNI GROUP**

Per: \_\_\_\_\_

  
Chris Jackson  
General Counsel