



Ontario Federation of Agriculture

Ontario AgriCentre

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Emma Schwab-Pflug
Senior Policy Advisor
Ministry of Energy
Conservation and Renewable Energy Division
77 Grenville Street, Floor 5
Toronto, Ontario
M7A 2C1

Regarding EBR 012-8435

Dear Ms. Schwab-Pflug;

Thank you for the opportunity to submit comments regarding proposed amendments to the 2005 Ontario Regulation 541/05: Net Metering. The Ontario Federation of Agriculture (OFA) is the largest voluntary farm organization in Canada and advocates on behalf of over 36,000 family farms and farm businesses. These farm businesses form the backbone of our rural communities and our robust food system has the potential to drive the Ontario economy forward.

OFA supports proposed amendments to O. Reg 541/05. Specifically, we are encouraged that proposed amendments are designed to value net energy exports relevant to the customer's existing load billing under TOU or Tiered pricing, and the proposed extension to a full year requirement for LDCs to carry customer energy credits.

For the Ministry to meet the stated goal of matching local generation to local load, OFA supports the proposed removal of the 500 kW generation ceiling restriction which impeded the ability of customers to reasonably match their generation and load demand potentials.

OFA is also encouraged with the proposed amendment allowing single LDC territory customers to apply credit transfers between multiple accounts held by the individual or corporate customer under the Single Entity Virtual Net Metering proposal. We further recommend the Ministry enhance the Virtual Net Metering proposal to include additional entity types such as community cooperatives, municipalities and aboriginal groups.

We do not however support the arbitrary 3 km maximum limit for separation of multiple account operations. Farm businesses sometimes have multiple sites that are more than 3 km apart. For the Net Metering program to achieve the goal of matching local generation to local demand, thereby maintaining existing infrastructure, participants and distributors should not be further restricted within an LDC territory.

As Ontario moves closer to cost effective storage options, we support the proposed amendment to allow storage to be incorporated in renewable generation scenarios under Net Metering arrangements.

Finally, allowing customers with existing Net Metering agreements the option to continue with current contracts or undertake new agreements following amendments to O. Reg 541/05 is a fair and reasonable measure to include in this EBR. These proposed regulatory amendments and the Ministry's proposed administrative enhancements meant to standardize forms, streamline processes, and improve monitoring and data availability, will hopefully lead to improved communications and understanding of the program and increase levels of community and rural district participation.

Respectfully Submitted,



Don McCabe
President

CC: OFA Board of Directors