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Ben Weir, Senior Policy Adviser Ministry of Energy Renewable Energy Facilitation Office 77 Grenville Street, 5th Floor Toronto, ON M7A 2C1

Via Email Ben.Weir@ontario.ca and EBR Upload

Mr. Weir:

Re: EBR 013-1915 - Proposed Amendment to Reg 389/10: (General), under the Energy Consumer Protection Act, 2010

The Ontario Federation of Agriculture (OFA) is the largest voluntary, general farm organization in Canada, representing over 37,000 farm families across Ontario. As a dynamic farmer-led organization based in Guelph, Ontario, OFA works to represent and champion the interests of Ontario farmers through government relations, farm policy recommendations, lobby efforts, community representation, media relations and more. OFA is the leading advocate and voice for Ontario farmers.

OFA supports the proposed amendments designed to ensure customers entering into third party ownership (TPO) electricity retail agreements can make informed decisions and can understand the impacts of associated contracts or agreements not covered under the Energy Consumer Protection Act, 2010.

With the close of feed-in-tariff (FIT) programs at the end of 2017, net metering remains the sole program for procurement of renewable energy in Ontario. OFA supports plans to enhance net metering as part of a smart grid system, including third-party ownership. This proposed amendment under the Energy Consumer Protection Act ensures that under proposed TPO net metering legislation, consumers have sufficient protection.

OFA takes this opportunity to recommend the Ministry further review Energy Consumer Protection legislation with the objective of improving protection for agricultural sector businesses. Many farm operations are small family owned and operated enterprises that would significantly benefit from clear protection not offered through in the existing Energy Consumer Protection legislation for small businesses.

Sincerely

Neil Currie General Manager