



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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January 18, 2018

Erin Thompson  
Senior Policy Advisor  
Ministry of Energy  
Conservation and Renewable Energy Division  
77 Grenville Street, Floor 5  
Toronto ON  
M7A 2C1

Via email [Erin.Thompson@ontario.ca](mailto:Erin.Thompson@ontario.ca) and EBR upload

Dear Ms. Thompson,

**Re: EBR 013-1874 Regulation Proposal Province-Wide Implementation of Green Button**

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.

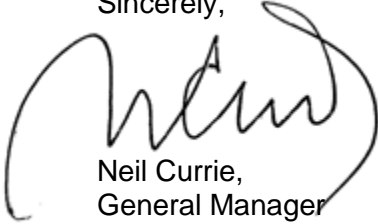
OFA supports the proposed regulation to implement Green Button by utilities as an appropriate step towards smart grid data management. Green Button, as the common standard for energy data and data transfer, will facilitate significant improvements in efficiency and conservation technologies, and improve management of Large Building Reporting requirements.

The Green Button Standard is the North American standard for utilities and a majority of Ontario residential and small business electricity accounts have adopted the standard.

OFA is concerned with the proposed deadline of July 1, 2020 for utility implementation of Green Button, and how utilities will use Rate Setting mechanisms to recoup implementation and administration costs. OFA is concerned by the lack high-speed or even basic internet in rural, remote and northern Ontario, and proposed deadline exemptions for the Hydro One Remote Communities area and other Northern utility regions. While it is prudent that ENERGY recognize that the Ontario Energy Board (OEB) may need to extend reasonable compliance time lines, this may also allow utilities to delay compliance for financial reasons. And the prospect of rate payer financing by rural customers that are not able to benefit from the Green Button Standard also concerns our members.

Access to high-speed internet is a reality for urban centres and much of southern Ontario but an unattainable luxury for rural, remote and northern communities. This failing must be corrected before mandating smart grid data management. Otherwise, the risks of excessive cost overruns and delays, to reach a portion of Green Button goals will be unacceptable.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil Currie', enclosed within a large, loopy circular flourish.

Neil Currie,  
General Manager