



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Regarding: PROPOSED AMENDMENT TO RENEWABLE ENERGY APPROVALS (O REG. 359/09)

Thank you for the opportunity to comment on a proposed amendment to Ontario Reg. 359/09. The Ontario Federation of Agriculture is Canada's largest voluntary farm organization and represents thousands of rural energy consumers and farm-based energy generation operations.

Currently, renewable energy developers, with generation above certain name plate capacity, must get environmental approval by ensuring projects reduce negative impacts on natural heritage, noise and water pollution. This process is meant to ensure project benefits outweigh impacts to the environment.

The proposed regulation amendment would require these renewable energy developers to also show that there is a demand for the electricity they will generate. The OFA supports this additional consideration meant to align long-term contracts for electricity generation to demand.

However, OFA recommends the Government consider the ability of the IESO to align long-term contractual generation with current and immediate demand forecasts.

And, for clarify, OFA recommends that local, distribution level developers need to illustrate that local capacity and demand shortfalls are met, to obtain the proposed amendment approval, and not transmission level capacity demand shortfalls.

On behalf of OFA's more than 38,000 farm family businesses, we look forward to working with the Ministries of Environment, Conservation and Parks, and, Energy, Northern Development and Mines to ensure proposed amendments accurately reflect the best interests of agricultural, the environment, and Ontario long-term energy policy objectives.

Regards,

Keith Currie,  
President