



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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October 21, 2018

Paul Johnson  
Director (Acting), Conservation Programs and Partnerships  
Conservation and Renewable Energy Division  
Ministry of Energy, Northern Development and Mines  
77 Grenville Street, 5th Floor  
Toronto ON M7A 2C1

VIA EMAIL: [paul.johnson3@ontario.ca](mailto:paul.johnson3@ontario.ca)

Mr. Johnson,

**Regarding: Bill 34, Proposed Repeal of Green Energy Act and Amendments to Electricity Act, Planning Act and Environmental Protection Act**

The Ontario Federation of Agriculture is Canada's largest voluntary farm organization and represents thousands of rural energy consumers. Thank you for the opportunity to comment on Bill 34, Green Energy Repeal Act, 2018, and associated Amendments to the Electricity, Planning and Environmental Protection Acts.

The Green Energy Act encouraged renewable energy production and conservation, initiated green energy jobs and significantly altered Ontario's energy portfolio. With the proposed repeal, related Electricity Act legislation amendments will reintroduce standards for conservation, energy efficiency standards, benchmark reporting and customer data.

Also repealed will be a requirement that government facilities consider environmental responsibility, energy and water efficient design and GHG emissions reporting. We are encouraged that Ontario has signalled that costs will squarely factor into energy and emissions target plans; however, these other factors should remain considerations along with cost for determining and managing Ontario's facilities portfolio.

The OFA supports Bill 34 amendments to the Environmental Protection Act to enable government to refuse approving renewable energy projects where demand for project generated electricity has not been demonstrated to the satisfaction of the government. OFA recommends supply and demand management, and capacity planning remain with the IESO.

The OFA supports accompanying Planning Act provisions that would restore municipal planning authority for renewable energy undertakings and empower the province and municipalities to reject renewable energy projects. Until such regulations are enacted under the Electricity Act, 1998, however, these re-enacted provisions will have little effect.

OFA recommends Ontario continue to consider green energy efficiencies, benchmarks and reporting, tempered by fiscal restraint, and system capacity, supply and demand considerations.



Local government and stakeholders should be fully empowered during any rural or regional development processes, including energy infrastructure.

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,

A handwritten signature in black ink, appearing to read "Keith Currie", is positioned above the typed name. The signature is fluid and cursive.

Keith Currie  
President