

November 20, 2020

The Honourable Greg Rickford
Minister of Energy, Northern Development and Mines
Whitney Block,
99 Wellesley Street West
5th Floor, Room 5630
Toronto, ON
M7A 1W1

Dear Minister Rickford,

**Re: ERO 019-2531 - Proposed Changes to Net Metering Regulation to Support
Community-Based Energy Systems**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA supports this proposal to enable community net metering of demonstration projects. As noted in the consultation information, community net metering refers to a net metering arrangement that allows for the transfer or sharing of credits from generation facilities within a community across multiple metered accounts. Enabling community net metering demonstration projects would no doubt provide customers and developers more opportunities to participate in net metering initiatives. We understand that the ministry looks to make renewable generation a key feature of a net-metered community. Our rural and farm communities have stable and reliable sources of agricultural biomass feedstock that can supply many fuel options for net metering initiatives to lower a community's costs and meet sustainability goals.

We also support your ministry's proposed regulatory changes that provide an opportunity to build and operate demonstration projects. We further support your ministry's intention to monitor and evaluate the performance of these demonstration projects to inform future policy development and help identify regulatory challenges to ensure clear and simple requirements that are needed to build and operate future net metering projects. OFA supports efforts to reduce regulatory

barriers that would otherwise inhibit business opportunities, while still ensuring consumer protection.

OFA is keen to work with your ministry to ensure unique opportunities, such as farm-based, or farm cluster based RNG systems are given the opportunity to partake in pilots to create clean, sustainable fuel to meet rural community energy needs.

We recommend the ministry make use of Canadian Biogas Association (CBA) expertise. The CBA is well positioned to support both municipal and smaller community projects using biogas and RNG to produce green fuel-powered local generators and economic development while helping address rural distribution constraints. Mapping tools can be used to identify optimal locations for RNG projects such that they are ideally close to available agricultural feedstocks.

OFA also recommends the ministry work with the Association of Municipalities of Ontario (AMO) to develop pilots and business development strategies that could in turn drive strategic siting of multiple municipal facilities throughout rural and regional Ontario to further address grid constraints while delivering economic opportunities.

These alliances, and collaboration with the Ontario Ministry of Agriculture, Food and Rural Affairs will help ensure the adoption of best practices, policies and programs to fit community needs.

Sincerely,



Keith Currie
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
Ms. Cassandra Rosen, Senior Policy Advisor, Renewables Policy Unit, Ministry of Energy, Northern Development and Mines
Ms. Judy Dezell, Director Enterprise Centre, Business Partnerships, Association of Municipalities of Ontario (AMO)
Ms. Jennifer Green, Executive Director, Canadian Biogas Association
OFA Board of Directors