

April 21, 2021

Rachel Thompson
Ministry of Energy, Northern Development and Mines,
Strategic Network and Agency Policy Division
77 Grenville Street, 6th Floor
Toronto, ON, M7A 2C1
Sent via email to: Rachel.thompson3@ontario.ca
and submitted online through the Environmental Registry of Ontario

Dear Ms. Thompson,

Re: ERO # 019-3007 - Ontario Long-Term Energy Planning Framework Review

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.

We are pleased to provide comments on the LTEP framework review from an agricultural perspective, a sector with unique energy demand profiles. Agriculture and the agri-food sector are energy intense industries. Greenhouses, perishable crop storage, grain drying, food processing, and livestock and poultry building HVAC systems have high demand for a combination of electricity, natural gas and propane. While we continue to incorporate renewable energy options as they arise, agriculture is a rural industry challenged by capacity constraints in the regions of Niagara and southwest Ontario, and challenged by energy security and reliability issues throughout the province. And while few farm businesses are large enough to participate in demand management incentive programs, we are an industry that readily incorporates energy efficiency and conservation platforms as they become available.

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OFA supports reductions in carbon emissions as we move away from fossil fuel based energy, but this is a transition, and until renewable energy options are feasible for farm equipment power requirements, we will continue to strive to secure reliable, traditional fuel options. Challenges include electricity quality; voltage drops and surges, uncontrolled ground currents, and supply constraints; propane supply interruptions, risks of losing crude oil supplies through Enbridge Line 5, and efforts to bring natural gas infrastructure to our rural farm communities.

MENDM intends the LTEP framework to prioritize transparency in a more predictable and reliable decision-making process, with the expectation of increased investment certainty. We support this and the intention to enable the technical expertise of the Independent Electricity System Operator (IESO) and the Ontario Energy Board (OEB). While elevating these organizations requires reviews of the Electricity Act and their corresponding mandates, we encourage the Ministry to also review the capacity of IESO and OEB to ensure they have sufficient systems and processes in place to effectively oversee, evaluate and improve the performance of programs, planning and resource acquisitions.

The purpose of consulting at this stage in the LTEP framework review is to communicate the proposed objectives of refocusing the planning process and to invite stakeholders to share ideas and perspectives with the Ministry. The Ministry's ERO Proposal contains phrases such as electricity needs, electricity grid, electricity system, but does not reference the needs, systems or distribution of natural gas, a much larger energy supply demand in Ontario. While recent Energy Ministers prefer to be energy agnostic in decision-making, all energy sources merit improvements to transparency, accountability and effective planning. By only focusing on electricity you risk losing the agnostic approach.

We support the energy agnostic government approach whereby a combination of incentives and carbon costs enable private investment and technological advances to drive cheaper and cleaner options. This is also a transition, whereby medium term government direction to IESO and OEB will inform which cleaner technologies may need some assistance while we become truly energy agnostic.

The government should continue to review and direct overarching priorities to ensure these authorities reflect the government of the day. Acknowledging that a target for zero carbon emissions is a permanent goal for the province and country, IESO and OEB should be empowered to expand emissions control incentives from the energy sector, and develop programs for pipeline and electrical grid applications.

OFA supports a renewed planning framework that incorporates other ministries and stakeholders in such a broad review and ensure climate change mitigation and adaption are foundational. This means incentivising and enabling businesses to adopt technologies to go along with a cleaner energy system. Otherwise we risk missing our emission reduction targets.

We support government enabling OEB to focus on longer term strategies and goals. For example, when contemplating community level natural gas expansions, the deciding factor cannot only look at cost per connection.

Enabling the use of a strategic vision to balance cost efficiency with calculated expansion will better deliver on Ontario's objectives – connect more people and businesses to fuels that are cleaner than existing fuels, providing the private sector with opportunities to green the system. This longer view will enable foundational expansions which will in turn enable more-viable projects.

This more strategic view would include easier access for municipal and rural agriculturally based renewable natural gas pilots and pilots to also inject green hydrogen into the expanded pipeline infrastructure. We also support the Ministry enabling OEB to update natural gas conservation program framework.

The mandates for IESO and OEB must ensure safety and consumer protection. However, these organizations are uniquely situated to also enable more unique pilots for greener energy. We support empowering IESO and OEB to expand demand management incentives tailored for unique sectors that are not large enough to participate in the Industrial Conservation Incentive program to effect regional demand management with cleaner renewable tools.

These recommendations are best achieved with a tempered approach to ensure costs are practical and adaptable. We recommend the government consider oversight or review by an expert committee, guided by government policy statements and mandates.

Our farm businesses rely on the work of Ministry staff and policymakers to advance our energy systems, and the development and execution of programs by dedicated IESO and OEB staff. Thank you for providing this opportunity to present an agricultural perspective to the review process of long-term energy planning. I look forward to continued collaboration with the Ministry and Ontario energy authorities.

Sincerely,



Peggy Brekveld,
President

CC The Honourable Greg Rickford, Minister of Energy, Northern Development and Mines
 The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
 Terry Young, Interim President and Chief Executive Officer, Independent Electricity
 System Operator
 Richard Dicerni, Chair of the Board of Directors, Ontario Energy Board
 OFA Board of Directors

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