

May 25, 2021

Mr. William Coutts  
Ministry of Energy, Northern Development and Mines  
Conservation and Renewable Energy Division  
77 Grenville Street, 5<sup>th</sup> Floor,  
Toronto, ON  
M7A 2C1

Sent via email to: [William.Coutts@ontario.ca](mailto:William.Coutts@ontario.ca)  
and submitted online via Environmental Registry of Ontario

Dear Mr. Coutts,

**Re: ERO # 019-3471 - Eliminating Renewable Energy Requirements**

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 from an agricultural and rural Ontario perspective on the Ministry proposal to repeal sections in the Electricity Act (EA) and the Ontario Energy Board Act (OEBA) that promoted and prioritized renewable energy (RE) generation projects. These repeals are driven by the government position that prioritizing RE generation is no longer appropriate.

While some may argue that RE generation no longer needs the upper hand, we are concerned that repeal of certain sections to the two Acts, without accounting for the carbon costs associated with fossil fuels, will send the signal that Ontario no longer supports continued and additional low carbon or carbon neutral solutions for energy generation.

The Green Energy Act distorted the marketplace to rapidly and significantly green Ontario's electricity generation. Removing priority provisions for completing RE grid connection assessments brings consistency for all generation types seeking connection and should drive energy competitiveness. However, until CO2e emissions of fossil fuel based generation are truly and fully costed, having energy agnostic capacity auctions will also distort the marketplace in favour of cheaper generation that is higher in CO2e emissions.

Recognizing the danger of allowing the pendulum to swing too far in the other direction from the Green Energy Act, we recommend the Ministry direct regulators that the proposed regulatory amendments are not meant to completely remove RE from the discussion. Ontario should recognize and correctly account for the value of permanent and continued carbon emission reductions and recognize carbon neutral energy options as integral to our energy systems.

We support the OEB identifying barriers to Distributed Energy Resources (DER) connections and to standardize the connection process. However, we are concerned that the OEB Framework: DER and Utility Incentives consultation is considering reforms based solely on value to customers, will send the signal that money is the only recognized measure. This consultation should explore DER reforms while also reducing the carbon footprint in our energy systems.

The Ministry's endeavour to be energy agnostic, by repealing OEBA sections that promote RE in scheduling Leave to Construct applications, limits the ability for RE to have a permanent place at the table. While this will focus the scope of Leave to Construct hearings on the topics of price, reliability, and quality of service, we support the Ministry sending the message that carbon emissions have a specific cost and should still be included for consideration.

Sincerely,



Peggy Brekveld  
President

cc: OFA Board of Directors  
The Honourable Greg Rickford, Ontario Minister of Energy

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