

November 17, 2021

The Hon. Todd A. Smith
Ontario Minister of Energy
77 Grenville Street, 10th Floor
Toronto, ON
M7A 2C1
Sent via email to: MinisterEnergy@ontario.ca

Dear Minister,

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

In October 2018, the government revoked new regulations to allow third party ownership of net-metered facilities to provide flexibility for virtual net metering demonstration projects. The government now considers any developments to the net metering regulatory framework in the context of Ontario's broader energy policy priorities.

In November 2020, the government revisited Ontario's Net Metering Regulation, as an enabling proposal for a community net metering pilot to support projects such as net-zero communities using distributed energy resources. This past September, Ontario filed O. Reg. 679/21: Community Net Metering Projects made under the *Ontario Energy Board Act* to enable community net metering (CNM) demonstration projects.

The Community Net Metering regulation is a positive step towards clean energy sustainability and energy self-reliance for Ontario communities. As indicated in our submission on the CNM demonstration pilot, we support these initiatives, and enabling regulations to simplify implementing future projects.

Considering provincial constraints within transmission and distribution energy systems, Ontario's farm communities have stable and reliable renewable sources of biomass feedstock that can supply many fuel options for net metering initiatives to lower community energy costs and meet sustainability goals. The agricultural sector perspective can help inform feedstock options, system logistics, and validate pilots to improve net metering design and innovation.

OFA is eager to work with your ministry to ensure unique opportunities, such as farm cluster based Renewable Natural Gas (RNG) systems, are given the opportunity to partake in pilots to create clean, sustainable fuel to meet rural community energy needs, support distributed energy resources, and contribute to CNM models.

Small rural community projects using biogas and RNG to produce green fuel-powered solutions can generate economic development while helping address rural distribution constraints. Existing mapping tools can be used to identify optimal locations for RNG projects near to available agricultural feedstocks and municipal organic waste resources strategically sited throughout rural and regional Ontario.

I look forward to further discussing these opportunities with you and extend an offer to collaborate with the Ministry as prospects develop.

Sincerely,



Peggy Brekveld
President

cc: David Donovan, Chief of Staff, Ministry of Energy
OFA Board of Directors