

September 23, 2022

Kevork Hacatoglu
Ministry of Energy, Conservation and Renewable Energy Division
77 Grenville Street, 5th floor
Toronto, ON
M7A 2C1

Sent via email to Kevork.Hacatoglu@Ontario.ca and online to the Environmental Registry

Dear Kevork Hacatoglu,

Re: ER - 019-5849 Implementation of an Ultra-Low Overnight Electricity Regulated Price Plan

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 dedicated to ensuring the agri-food sector and 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 agri-food sector represents a broad range of innovative energy suppliers and consumers established throughout the province. We are pleased to present comments from the perspective of the agricultural sector and Ontario's rural farming communities.

OFA welcomes the efforts of the Ministry of Energy in broadening the choice of available Regulated Price Plans for electricity consumers. Many of our farm members have opted into switching between Tiered and Time-Of-Use plans as their individual demand profiles reflect their need to adjust their billing profile. It is important to address those consumers in rural areas that still do not have access to reliable broadband infrastructure which limits their ability to switch to the TOU price plan or the proposed Ultra-low-Overnight Electricity (ULOE) plan.

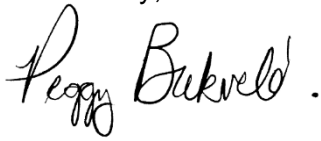
The expansion of broadband infrastructure and reliable internet service is a priority for Ontario farmers. OFA supports efforts to increase the rate of broadband expansion in Ontario, especially to rural areas that are significantly underserved, and we encourage government to remove barriers that slow development and delay deployment.

OFA has advocated for Ontario governments to allow Ontario businesses to change their electricity demand profile to access overnight baseline surpluses at a deep discount, thereby avoiding the IESO from selling surplus overnight electricity below cost to neighbouring jurisdictions.

We encourage you to consider these Ontario's businesses that are on demand billing, yet not large enough to participate in the Industrial Conservation Initiative, or to commit the capital needed for innovative conservation and demand management. Many farm operations cannot curtail demand and continue to safely operate, including livestock operations and perishable crop operations that rely on HVAC, regardless of seasonal demand peaks in urban centres. Access to a steep rate reduction for many of these mid-sized operations could contribute significant results to Ontario's objective of shifting demand away from peak periods to off-peak periods when surplus intermittent renewable energy and baseline nuclear generation is still under contract to be purchased by the IESO.

Ontario farmers are innovators. OFA is hopeful there are continued opportunities for farm stakeholders to engage the Ministry to make sure agricultural and agri-food businesses continue to sustain Ontario in the future.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs
The Honourable Todd Smith, Ontario Minister of Energy
OFA Board of Directors