

June 23, 2023

Ceirán Bishop
Director, Critical Initiatives
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Via OEB Registry upload and email ceiran.bishop@oeb.ca

Dear Ceiran Bishop,

Re: EB-2023-0003 Distribution Sector Resilience, Responsiveness & Cost Efficiency

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

Agricultural communities rely on the electricity grid to power thousands of farm operations throughout Ontario, people that are stewards of land and ecosystems. OFA is pleased to provide an agricultural and rural perspective on OEB efforts to improve resiliency, responsiveness and cost efficiency in light of extreme weather events.

The severity, frequency and duration of extreme events are increasing. The Insurance Bureau of Canada indicates that the annual cost of Ontario natural disasters increased tenfold since 2010, to \$1.2 billion in 2022. While the OEB influences reliability investments to ensure prompt response to customers' needs, the benefits of a resilient electricity system are broad. The costs to recover from extreme events, and the investments to build a resilient system should be borne broadly. OFA recommends the OEB consider advising the Minister that, as the tax system imposes rates relative to incomes, government should leverage public funds to defray the costs of resiliency.

During the review of the electricity system resiliency, Ontario is designing a pathway to a decarbonized and expanded electricity system through 2050. All of these electricity system transitions are relevant to and should align with federal and Ontario broader climate change goals.

OFA recommends the OEB work with the government, the IESO and utilities to establish climate goals for regulators aligned with the province, and work to better integrate with neighbouring electricity systems. The decarbonization and electrification of our energy systems requires sources to generate power on demand, enhance grid integration, battery storage, and smart technologies needed to shift consumption. Public policy and the key public institutions should

consider the relation of these issues when forming procurement targets and considering electricity system infrastructure investments.

The Independent Electricity System Operator (IESO) estimates that, along with scheduled decommissions, the amount of new zero carbon procurements to meet 2050 capacity targets will consume 2.1 million acres of land, mostly in rural and farm regions. While decarbonization, expanded electrification and climate resiliency are important to the sustainability of our electricity systems, extreme weather events also impact the sustainability of our food systems.

OFA supports the preservation of Ontario's finite resources of arable farm land. Canada Land Inventory 1 through 4 should not be used for the expanded development of zero emission generation or systems to enhance and manage supply and demand. OFA recommends the Ministry and regulators prioritize the reuse of decommissioned facility sites, and use of existing brownfield, commercial and industrial lands to site electricity system infrastructure.

Rural distribution lines with terminal spoke designs are not able to manage the duration and extent of an outage as well as urban systems, where lines and substations with more interconnections can isolate and reduce the extend of an outage. OFA strongly recommends the OEB work with utilities and the IESO to consider existing rural electricity system deficiencies that are exacerbated by extreme weather events. Event resiliency is the ability to prepare for, withstand, respond to, rapidly recover from, and adapt to, extreme weather events. OFA recommends decisionmakers consider incremental improvements to rural energy systems during the transition to an expanded, resilient and clean system. For example, continuing a terminating line down to the next concession road to loop back to the substation will improve event resiliency while addressing rural system deficiencies such as voltage drops typical along terminating lines.

Related to managing distributor expectations, improving utility transparency and continuous improvement, OFA supports specific, measurable, achievable, relevant, and timely utility reporting. Identifying efficiencies that may be related to the size and capability of a given utility to be climate change resilient, ensures value for money. A utility that identifies areas for improvement, and transparently shares best practices, their challenges and capabilities to manage events safely, quickly and efficiently, should be considered the model for Ontario's distribution sector.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors