

May 18, 2023

Ministry of Energy  
77 Grenville Street,  
6th Floor,  
Toronto ON  
M7A 2C1

Submitted online via Ontario's Regulatory Registry

To Whom It may Concern;

**Re: 23-ENDM014 Advancing Innovation in Ontario's Energy Sector**

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 during any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

The Ministry of Energy (Ministry), through the Ontario Energy Board (OEB) and the Independent Electricity System (IESO), aims to transform our energy sector into a decentralized and decarbonized system capable of delivering increased capacity to a more electrified energy load. OFA is pleased to provide comments on proposed OEB Act amendments, to facilitate innovative pilots or demonstration projects, from the perspective of Ontario's agricultural sector.

OFA supports the province removing avoidable costs and red tape to allow our energy systems to transition to a more sustainable and renewable energy future. Enabling distribution, retailing, wholesaling and sub-metering pilots to forego licensing requirements on a time-limited basis will encourage more pilot and demonstration test projects to proceed.

OFA notes that the proposed amendments do not specify the number of years a pilot or demonstration project would be exempt from licence requirements. We also note that the Ministry indicates, but does not specify, further statutory requirements such projects may receive through amendments to various other legislation. OFA recommends the Ministry expand transparency on these matters to allow stakeholders to provide better informed comments.

Distributed energy systems will play an important role to meet balancing needs in rural and urban regions. From an agricultural perspective, this presents opportunities to advance regional electricity infrastructure. OFA recommends decision-makers take a practical approach to improving local and grid system level deficiencies when assessing pilot and demonstration projects. This includes developing three-phase power and looping terminal lines, to help reduce stray voltage, brownout and voltage drop occurrences, and to shorten downtime during outages.

A decentralized energy system will increase the footprint of energy infrastructure throughout Ontario rural and remote regions. This added pressure to Ontario's finite specialty and Canada Land Class 1 through 4 farm land must be carefully managed, and should prioritize local, Indigenous, private public partnership project and non-wire alternative solutions that improve power quality and reliability in rural and remote parts of the province.

OFA strives to ensure farming and agri-food has a voice in energy policy and the design, construction and operation of energy infrastructure. There is a larger conversation to be had about siting projects in optimal locations to help sustain, expand and modernize both our farm sector and our electricity system. We are happy to discuss this further, and we appreciate the opportunity to present a perspective from the viewpoint of Ontarians living in rural and farm communities.

Regards,



Peggy Brekveld  
President

cc OFA Board of Directors