

November 1, 2024

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

Via email to Gabriel.weekes2@ontario.ca and uploaded to the Environmental Registry of Ontario

Dear Gabriel Weekes,

RE: ER-019-9235 2025–2036 Electricity Energy Efficiency Framework

On behalf of over 38,000 farm family members of the Ontario Federation of Agriculture (OFA), we appreciate the opportunity to provide a rural and agricultural perspective the new ten-year Electricity Energy Efficiency Framework. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. The proposed electricity demand-side management (eDSM) framework has the ability to help sustain rural communities, the agri-food sector and grow our farm businesses.

Rural community and business customers need a reliable and evolving electricity system to be able to participate in many energy efficiency (EE) programs. In the December 2023 Report of the Electrification and Energy Transition Panel to the Minister of Energy, recommendation 17 states

To make full use of the innovation in distributed energy resources and the electricity distribution sector, the OEB and IESO must continue to find ways within their existing mandates and in anticipation of the clean energy economy policy commitment to provide proactive and transparent thought leadership on regulatory policy and critically review and revise their existing policies and processes.

While the focus of the transition to higher electrification is the bulk system, the Minister of Energy recognizes that the transition will take different timelines and resources in various distribution regions to meet provincial goals. **OFA recommends the Ontario Energy Board (OEB) and Independent Electricity System Operator (IESO) support policies and processes that encourage continuous distribution system improvements in rural and northern regions, to ensure climate resiliency, meet higher electricity demand and enable Conservation and Demand Management programs (CDM).** Many rural customers do not have the smart meters needed to collect usage data for demand management. Many rural business customers have

electricity supply constraints, and most rural customers do not have access to the three-phase power necessary to properly operate variable-speed motors and efficiently charge battery storage systems. Customers near the end of rural distribution lines experience voltage drops that risk damage to the motors and equipment they rely upon. As part of the EE framework, we recommend the Ministry of Energy consider these impediments to rural enrolment and support the continued improvement of rural local distribution company (LDC) systems.

Over the next twenty-five years the IESO will undertake significant transmission system capacity and energy procurements. We encourage the Ministry to improve EE program responsiveness to meet rural customer needs and improve LDC involvement by expanding the Local Initiatives Regional Adders to encourage program uptake in additional rural and northern regions where electricity constraints exist. Suitably sited Distributed Energy Resources (DERs) improve local system constraints and improve transmission system constraints and responsiveness. While most agri-food businesses are unable to participate in IESO Long-Term procurements, it is important that they are able to derive benefit from participating in LDC projects including DERs.

Livestock and perishable crops require temperature controlled environments, regardless of the peak system demand. Load shifting to off-peak hours is not possible for many types of farm production without incentives for smaller operations to operate behind-the-meter systems and support to enable farm communities to operate DERs.

Our farm sector does have a history of strong participation in Save On Energy programs. The Retrofit Program for lighting controls, HVAC, variable-speed pumps and motors, is essential to help small businesses make investments to improve their efficiency, reduce electricity consumption, and reduce their carbon footprint.

The availability of agricultural-specific incentives, including LED lights and controls, ventilation upgrades, and high-efficiency and recirculating fans, are important to farm operations with very thin profit margins seeking every opportunity to reduce costs.

Specific programs for the greenhouse sector, including LED grow light incentives and access to research and advice, are important to growers looking to improve production and reduce electricity use. The recent Southwest Region Greenhouse DER offering helps growers diversify their operation by installing roof-mounted solar with battery storage.

OFA supports the Ministry of Energy continuing these Save On Energy incentive programs. While the Save On Energy programs are meant to reduce electricity consumption, we encourage you to consider that specific light spectrums also have positive effects on livestock. For example, raising poultry under 5000 Kelvin LEDs reduces stress and improves weight gain¹. Including livestock sectors in Save On Energy LED *specific grow light spectrum* programs can directly reduce electricity consumption, improve animal welfare, and improve production. The

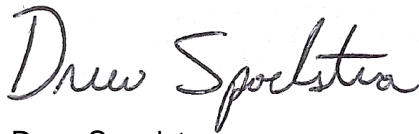
¹ Science Direct, U.S. DOI. Volume 12, Issue 5, pages 1015-1021, Color Temperature of LED Lighting Matters for Optimum Growth of Broiler Chickens. 2018. <https://doi.org/10.1017/S1751733117002361>

increase in production per square foot results in avoidance of additional electricity consumption that would result from an operation expanding square footage to otherwise realize the same livestock production improvements.

We recommend expanding the Greenhouse DER offering to other regions, agricultural sub-sectors, and other types of renewable energy production. This could include the Niagara region greenhouse sector, livestock operations throughout the province with ample animal housing structures for roof-mounted solar, and include other types of on farm energy produced as part of integrated farm operations. For example, livestock operations that use anaerobic digestors to improve manure management, and greenhouse operations that use combined heat and power equipment to produce heat and CO2 for their plants, could use excess biogas or heat to power DERs and participate in an expanded Southwest Greenhouse DER offering in other capacity constrained regions.

With upgrades to the rural grid system, and broadening opportunities to more types of farm operation and the agri-food sector, Ontario will be well-positioned to reduce electricity demand through EE and help to sustain our vital food system. We look forward to continuing to work with the Ministry of Energy and Electrification, as well as the IESO, to find innovative ways to reduce consumption, improve efficiency and meet the challenges of higher electrification in Ontario.

Sincerely,



Drew Spoelstra
President

cc: The Hon. Stephen Lecce, Ontario Minister of Energy and Electrification
The Hon. Rob Flack, Ontario Minister of Agriculture, Food and Agribusiness
OFA Board of Directors