Canadian Vehicle Manufacturers' Association
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Mr. Steen Hume
Assistant Deputy Minister
Energy Supply Policy Division
Ministry of Energy
7th Floor, 77 Grenville Street
Toronto, ON M7A 2C1

Subject: ERO Number 019-6647: IESO Pathways to Decarbonization Study

Dear Mr. Hume:

The Canadian Vehicle Manufacturers' Association (CVMA) representing Ford Motor Company of Canada, Limited, General Motors of Canada Company and Stellantis (FCA Canada Inc.), appreciates the opportunity to comment on the ERO posting on the IESO Pathways to Decarbonization Study. Honda of Canada Mfg. and Toyota Motor Manufacturing Inc. share our views and support this letter. This letter represents the view of vehicle manufacturers operating facilities in Ontario.

The auto industry is currently undergoing a significant transformation towards electric vehicles, investing billions of dollars in products and operations. We support the Association of Major Power Consumers in Ontario's (AMPCO's) submission on the Decarbonization Study and believe that Ontario's electricity system must be clean, reliable, and affordable for all consumers, including industry, now and in the future.

Additionally, the system must be cost-competitive with other jurisdictions to make Ontario an attractive jurisdiction for investment. The system and grid should also be prepared to accommodate the increase in electricity loads for EV charging infrastructure without imposing additional costs and should be clean, reliable, and accessible.

The Decarbonization Study estimates a cost of about $400 billion to meet the projected demand peaks which is of concern and these costs should not be borne solely by ratepayers. The province should ensure the electricity demand and distribution for increased electrification of on-road vehicles, buildings, and other carbon-reduction related advancements are accurately forecast to minimize additional future costs. Additionally, the province and its organizations like IESO, should work with federal government departments to ensure the impact of national policies are understood and do not impose infeasible obligations and timelines on provinces.

We trust that our comments will be taken into consideration. We would welcome the opportunity to discuss our input.

Yours sincerely,

Yasmin Tarmohamed

Yasmin Tarmohamed
Vice President, Environment and Energy

Attachment

cc: Karen Moore, Ministry of Energy
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