

November 22, 2024

Hon. Stephen Lecce  
Ministry of Energy and Electrification  
10th Floor  
77 Grenville St.  
Toronto, ON M7A 2C1  
Dear Minister Lecce,

**Re: Bill 214, Affordable Energy Act, 2024**

Dear Minister Lecce,

Ontario Greenhouse Vegetable Growers (OGVG) appreciate the continued commitment for an affordable, reliable and clean energy system that supports intensifying electrification, increasing demand, and strong economic growth. We are very pleased to see support for high growth areas in Bill 214, Affordable Energy Act, 2024. As our members contribute to high growth areas across the province, the amendments concerning the Distribution System Code and the Transmission System Code will further support economic growth.

Cost allocation and recovery has been a barrier to growth as upfront costs for transmission and distribution infrastructure leave businesses to either 1) pay the full cost of the infrastructure upfront and wait as demand increases on the asset, or 2) wait until demand, potentially from competitors, increases making the asset affordable. The ongoing transition to electrification is only possible with available electrical assets being in place and the lack of financial flexibility in the planning of assets is a brake on economic development. Enabling amendments to the codes will support the opportunity for integrated on-farm generation to create new business opportunities to support sustainable agriculture and rural businesses while addressing broader regional capacity and voltage constraints. We look forward to supporting the fair allocation of costs in further consultations on the design and implementation of the regulations.

As participants in electricity energy efficiency (EE) programs, OGVG members have reduced energy demand by moving to more energy efficient lighting supported by advanced climate control systems. Enabling the IESO to support beneficial electrification (BE) to reduce overall energy use and support the shift to electricity from other fuels will allow customers to help reduce energy costs and increase participation in electrification. In support of these measures, it is critical that electricity both remain affordable and widely available to support investment in electrification.

We appreciate the recognition of high growth areas of which OGVG members have contributed by growing at a rate of 6% year over year for the past decade, the momentum of which is supported by these

proposed appendments. We look forward to providing additional comments supporting affordability, electrification, and sustainability with greater economic growth.

Sincerely,



Richard Lee  
Executive Director