



ONTARIO  
RIVERS  
ALLIANCE

379 Ronka Road  
Worthington, ON P0M3H0  
LindaH@OntarioRiversAlliance.ca  
OntarioRiversAlliance.ca

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Ministry of Energy and Electrification  
77 Grenville Street  
Toronto, Ontario  
M7A 2C1

By email: [Phydime.Bysshe@Ontario.ca](mailto:Phydime.Bysshe@Ontario.ca)

Re: ERO-019-9284 – Proposed Amendments to the *Electricity Act, 1998, Ontario Energy Board Act, 1998, and Energy Consumer Protection Act, 2010* to an enable affordable energy future

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore riverine ecosystems across the province. The ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

The Ministry of Energy and Electrification proposes legislative amendments that would enable the development of Ontario's Integrated Energy Resource Plan, which proports to "*make it more cost-effective to connect to the electricity grid, help reduce energy use to save families and businesses money and support the growth of EV adoption in Ontario.*" It is unclear from this posting how families will benefit from any of these amendments.

### **Integrated Energy Resource Planning Amendments:**

As usual, it is never what it is portrayed to be in the posting, because the posting is very lacking in details, which is where ORA's concerns begin.

This proposal goes beyond simply changing the name of the "*Long-Term Energy Plan*" to the "*Integrated Energy Resource Plan*". This new label and details do not allude to the promise made in the Long Term Energy Plan to only procure "non-emitting" electricity resources; however, it does talk about encompassing all forms of energy, including natural gas, which is very high in greenhouse gas (GHG) emissions, and especially methane. So, I can only assume that clean, renewable and non-emitting electricity resources are no longer a priority in Ontario, nor is the government addressing climate change and our increasingly more extreme weather.

It is unwise for this government to remove the requirement for the Independent Electricity System Operator (IESO) and Ontario Energy Board (OEB) to submit implementation plans to the Minister if they receive an implementation directive. All directives from the Minister should require rigorous implementation planning by these independent experts and authorities that ratepayers rely on. Electricity planning should never be fast-tracked on a government's whim to move a project forward quickly when careful planning and report-back steps are essential to ensure projects are sustainable, serve their intended purposes, and taxpayers' dollars are spent wisely.



### **Electricity Connections:**

Proposed amendments to the *Ontario Energy Board Act, 1998*, to enable more timely and cost-effective electricity grid expansions to support high growth areas would give government regulation-making authority to change how costs are allocated and recovered in areas where the prospect of load materializing in future is likely [as in the Ring of Fire which is strongly contested by several First Nation communities]. In other words, before all affected Indigenous communities have agreed to this development in their traditional territories, the government would pay to build the transmission lines and likely allocate those costs to ratepayers. If the Ring of Fire ever does materialize, the costs should be borne by those ‘first mover’ and other corporations intending to undertake developments. ORA strongly objects to these costs being born by ratepayers and taxpayers.

### **Exemptions for Electric Vehicles (EV) Charging:**

The proposed amendments to the *Ontario Energy Board Act, 1998*, and the *Energy Consumer Protection Act, 2010* (Acts) would state that these Acts do not apply and EV charging companies would be exempt with respect to distribution or retail of electricity for electric vehicle charging. EV companies would be exempt from EV charging activities, licensing, rate setting and reporting, and there would be no unnecessary limit to billing charges. So again, this lost revenue and unregulated business activities will fall back on the average ratepayer.

### **Programs to Increase Energy Affordability:**

The proposed amendments to the *Electricity Act, 1998*, “*would enable the IESO to administer enhanced energy efficiency programs that support beneficial electrification (BE). It would incentivise use of electricity instead of other fuels to reduce overall energy use*” by reducing costs for high consumption activities such as home heating and cooling, regardless of fuel-type (i.e., propane, oil, wood)”.

Again, it says “*this programming could be funded through electricity rates*”. It would pass the costs off to those using other forms of heating and cooling, i.e., propane, oil, wood, etc. First of all, it is unclear how switching over to “*electricity instead of other fuels*” would “*reduce overall energy use*”. It will likely also provide direct assistance to big industry and corporations’ electricity bills. This is totally unacceptable, and ORA is strongly opposed!

It is highly unlikely that the proposed integrated energy resource planning amendments will have a positive environmental impact. In fact, there will be devastating environmental impacts if planning and feedback loops are lost to fast-tracking projects. However, we won’t know until it is too late. This radical push will no doubt result in greater timeline setbacks and serious negative environmental and financial effects.

### **Conclusion:**

The Ontario government’s aspirations to become an “Energy Superpower”, on the backs of ratepayers and taxpayers, with many of the environmental guardrails removed long ago, is a scary prospect! Reading between the lines, it appears this government is moving against the best advice of the IESO and the OEB to build new electricity projects in bulk to sell to the US and other provinces. However, we won’t really know until the bills come in.



ORA is strongly opposed to the proposed amendments and recommends they be withdrawn.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
(705) 866-1677