

November 22, 2024

Phydime Bysshe
Policy Coordination and Outreach Branch
Ministry of Energy and Electrification
77 Grenville Street
Toronto, ON M7A 2C1

Sent via email to phydime.bysshe@ontario.ca and uploaded to the Environmental Registry of Ontario

Dear Phydime Bysshe,

Re: ER-019-9284 Proposed Legislative Amendments to Enable an Affordable Energy Future

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to provide a rural and agricultural perspective on the proposed legislative amendments designed to enable an affordable energy future. Representing over 38,000 farm families and the broader agri-food industry, OFA is committed to advocating for legislation and policies that support the sustainability and growth of farm businesses, as well as the vibrancy of rural communities.

We applaud the Ministry's recognition of the need for an integrated and flexible approach to Ontario's energy future, one that balances affordability, reliability, and environmental considerations. Below are OFA's comments on three key areas identified in the proposed amendments:

1. Integrated Energy Resource Planning Amendments

OFA supports comprehensive energy resource planning that includes a diverse mix of energy sources, efficiency measures, storage, and demand management. Flexibility in planning processes is crucial as Ontario's energy sector evolves.

We also support predictable planning cycles to foster private investment and streamline regulatory processes. Simplifying these processes, where ministerial directives may not require additional reporting steps, will enhance efficiency while maintaining robust oversight.

2. Electricity Connections to Support Growth

Timely and cost-effective electricity connections are vital for ensuring access to clean electricity. OFA appreciates the Ministry's focus on reducing the financial burden by enabling new cost allocation and recovery for connection infrastructure on "first mover" customers and expediting infrastructure development in high-growth areas.

However, we strongly recommend expanding this approach to include rural areas. It is essential to ensure that rural electricity infrastructure is climate-resilient, supports expanded capacity, and provides equitable access to three-phase power and improved power quality for agricultural and rural businesses.

3. Programs to Increase Energy Affordability

OFA supports empowering the Independent Electricity System Operator (IESO) to administer enhanced energy efficiency programs, including those that facilitate beneficial electrification. This shift is essential for reducing overall energy costs and usage.

For rural regions, addressing capacity constraints and modernizing infrastructure in alignment with the provincial energy framework is critical. OFA also recommends that SaveON Energy and similar programs include incentives for technologies that may not directly save electricity but contribute to increased efficiency and productivity per square foot, reducing the need for costly expansions.

Conclusion

OFA fully supports programs and legislation that enhance energy efficiency, provide affordable energy solutions, and address the unique needs of rural and agricultural stakeholders. Thank you for considering our perspective on these proposed amendments. We look forward to continued engagement to help shape a sustainable and equitable energy future for Ontario.

Sincerely,



Drew Spoelstra
President

cc: The Hon. Stephen Lecce, Minister of Energy and Electrification
The Hon. Rob Flack, Minister for Agriculture, Food and Agri-business
OFA Board of Directors