

November 22, 2024

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

Sent via email to [gabriel.weekes2@ontario.ca](mailto:gabriel.weekes2@ontario.ca) and uploaded to the Environmental Registry of Ontario

Dear Gabriel Weekes,

**Re: ER-019-9373 Proposed Programs to Promote Beneficial Electrification**

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 energy programming to promote conversion to efficient electricity use. To that end, 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 use and costs.

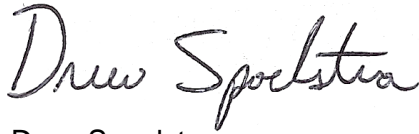
While comprehensive energy resource planning uses a diverse mix of energy sources, efficiency measures, storage, and demand management, flexibility is crucial as Ontario's energy sector evolves. In some rural and remote regions, this flexibility is needed until distribution infrastructure is able to accommodate beneficial electrification. In these areas, addressing capacity constraints and modernizing infrastructure will help to prepare for Beneficial Electrification opportunities.

It is essential to ensure that rural electricity infrastructure is climate-resilient, supports expanded demand, and provides equitable access to three-phase power and improved power quality for agricultural and rural businesses.

In addition, OFA recommends that SaveON Energy Agricultural 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, for example, specific spectrum lighting for crops and livestock. We strongly recommend expanding SaveOn programs as another approach to address rural energy constraints.

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