



Nov. 22<sup>nd</sup>, 2024

Attn: Phydime Bysshe  
Ministry of Energy and Electrification  
77 Grenville Street  
Toronto, ON, M7A 2C1  
Canada

Submitted online via [ERO Posting 019-9284](#)

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

To whom it may concern,

The Ontario Mining Association (OMA) appreciates the opportunity to offer our response to ERO posting 019-9284 aimed at enabling the development of the first Integrated Energy Resource Plan to make connecting to the electricity grid more cost effective and timely. The OMA applauds the government's continued efforts to support enhancing system readiness for areas of high growth.

The OMA was established in 1920 and is currently one of the largest standing trade organizations, serving over 80 members stationed throughout the province. The OMA and its members are committed to improving the competitiveness of the mining industry in Ontario by developing our abundant resources in an environmentally sustainable and economically viable way. We work to foster prosperity and sustainable growth for local communities and look to bolster mining's potential to be the cornerstone of decarbonization, sustainability and the energy transition in Ontario. Ontario's ability to support sustainable mining helps upstream capacity for the minerals needed for electric vehicle batteries and motors as well as advancements in aerospace, information and communications technology, advanced healthcare diagnostics, and more. The minerals mined in Ontario help position the province to be a leader in innovation and clean technology.

To this end, and related to the ERO posting, the OMA would like offer comments on:

- Integrated Energy Resource Planning Amendments
- Electricity Connections to Support Growth
- Programs to increase Energy Affordability

Thank you for taking the opportunity to review our comments. We look forward to continuing our proud history of working constructively with governments and communities to build consensus on issues that matter to our industry and to the people of this province. We would be happy to have a discussion on the comments below as well.

Thank you,

Priya Tandon  
President

## **Integrated Energy Resource Planning Amendments**

The OMA would like to thank the government's recognition to create a predictable energy planning cycle for investors, stakeholders, and Indigenous communities. The lack of predictability regarding energy supply and pricing poses as a barrier to the competitiveness of the mining industry in Ontario. The integrated energy resource planning process is an opportunity to align with industry regarding long term needs of the evolving sector. As demand for Ontario's minerals grows, both locally to support the uptake of electric vehicles, and internationally, integrated planning consultations beginning five years from the issuance of the last plan allows for changes in the mining sector to be accurately reflected.

Due to the location of most mines in Ontario, ensuring considerations of all forms of energy including electricity, natural gas, and other energy resources allows for the industry to operate uninterrupted. Northern Ontario and remote areas of the province have differing and complex energy requirements as weather and reliability issues pose as a challenge to initiate or expand operations through electrification. In these areas, natural gas remains as the option to be used strategically while electricity becomes increasingly viable and should be considered as the province procures new energy capacity.

OMA members acknowledge that although integrated energy planning should involve major energy stakeholders, it should also incorporate a multi-Ministry approach informed by Government of Ontario priorities, and include the Ministry of Mines, Ministry of Northern Development, Ministry of Indigenous Affairs and First Nations Economic Reconciliation, Ministry of Economic Development, Job Creation and Trade, and others. Investments to support mines and their requirements for power requires an integrated ministry approach to be successful. This includes but is not limited to building roads and transmission infrastructure as an investment towards future electrification in Northern Ontario and supporting Indigenous communities on the path towards electrification in a cost-effective manner.

## **Electricity Connections to Support Growth**

As the mining industry continues to grow, timely and cost-effective electricity grid expansions would help enable mines to electrify parts of their operations and work towards the province's decarbonization goals. We applaud the government's ongoing actions to address the growing energy needs in Northern Ontario. As demand for critical minerals increases, the mining industry requires more energy for current and future projects. As such, we support the initiative to reduce cost and financial burdens on 'first mover' customers and enable more timely development of connection infrastructure. The OMA and its members are committed to collaborating with the Ontario government, and affiliated stakeholders to keep partners informed of energy needs and electrification plans.

In northern Ontario, the responsibility for initiating and guiding the development of energy infrastructure falls on the industrial consumer however, due to the nature of the process, this often results in a lengthy process. This involves navigating the challenging and time-consuming System Impact Assessment (SIA) and Connection Impact Assessment (CIA) processes with the Independent Electricity System Operator (IESO) and Hydro One and engaging with private utilities or exploring self generation. Due to the current labour constraints in the mining industry, this proves to be challenging as it is a time-consuming process on top of managing day-to-day operations. Reducing challenges and streamlining processes would help industries address their growing energy needs more efficiently. The OMA also encourages that the power generation and transmission sector open to Indigenous equity partnerships to enhance own source revenue for communities.

## **Programs to increase Energy Affordability**

The OMA appreciates the amendment for the energy efficiency program to support beneficial electrification (BE). As mentioned above, natural gas offers a high level of reliability and resilience to the mining industry, especially in areas where grid constraints, cost impacts, technological limitations, and reliability issues continue to be a barrier to electrification. As technical and grid constraints continue to be addressed, natural gas, including compressed and liquefied natural gas can be an efficient solution for economic decarbonization. The OMA acknowledges that providing greater access to CNG and LNG can be beneficial as these fuel sources are a viable alternative because they provide both heat and electricity and possess less carbon dioxide per unit of volume than diesel or gasoline. The OMA supports the amendments for this programming to aid customers to reduce barriers towards the use of electricity instead of other fuels.

In addition, funding expanded to Indigenous communities reliant on diesel and other GHG emitting fuels to generate electricity and Indigenous-owned transmitters needs to be considered. When Indigenous communities share in equity participation in both power generation and transmission from low carbon alternatives, they are able to increase their own source revenue in a manner that aligns with values such as stewardship and sustainability. Henvey Inlet First Nation, located in central Ontario, is a successful example of a community that was able to make this transition and generate clean energy. The mining industry remains diligent in participating in efforts to reduce carbon emissions and welcomes BE funding as an addition to other measures of the energy efficiency framework.