



November 3rd, 2024

Attn: Gabriel Weekes
Ministry of Energy, Conservation and Renewable Energy Division
77 Grenville Street, 5th floor
M7A 2C1, Toronto, ON, Canada

Submitted via the Environmental Registry of Ontario - Posting [019-9235](#)

Re: 2025–2036 Electricity Energy Efficiency Framework

To whom it may concern,

The Ontario Mining Association (OMA) appreciates the ability to comment on the Electricity Energy Efficiency (EE) Framework from 2025-2036. As a large energy consumer, the mining industry supports the launch of the energy efficiency program to support affordability, optimize delivery, and launch new programs to provide more customer choice and savings. Long term stability and the expansion of energy efficiency programming are at the cornerstone of addressing Ontario's growing electricity needs.

OMA is committed to improving the competitiveness of the mining industry in Ontario. Established in 1920, OMA is one of the longest-serving trade organizations in Canada and has a 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. Functioning as a hub for discussions on community issues and opportunities, our goal is to provide members with a cohesive voice in public policy discussions to foster an environment that bolsters mining's potential to be the cornerstone of Ontario's new, innovation-oriented green economy. OMA currently represents more than 80 members situated throughout the province, who all diligently work towards fostering prosperity and sustainable growth for local communities, while remaining competitive in global markets.

The OMA would like to emphasize the importance of energy efficiency innovation to be included and supported through the framework. Funding to increase engineering abilities would spur innovation at the ground level and would support energy efficiency efforts from an industry level. Eliminating risks and barriers of innovative solutions and providing incentives for market entry can be invaluable. Providing upfront study funding to support companies with project applications further works to decrease barriers and de-risk market entry of innovative energy efficient technology. This could be especially beneficial for small to medium sized operations who have limited capacity and face additional barriers to market entry. Due to the competitive aspect of the funding, flexible and increased timelines for applications is helpful as companies work internally to build the business case.

Projects have high lead times so having longer funding commitments and a larger funding cap allows companies to explore a project portfolio in alignment with their mine life cycle. This allows industry to create a stronger business case for project development and provides flexibility for proponents to explore more advanced solutions. The OMA recommends that the project cap be increased from \$5 million to \$10 million, to be in alignment with federal funding, which attracts energy consumers. A

larger funding cap would also allow the operators to undergo reviews and recommendations using current market best practices and ensure that the most energy efficient technologies are developed.

In addition, the OMA members support expanding the program portfolio and building on current programs. As such, the OMA would like to request the resurfacing of the energy manager program as there are a number of additional benefits associated with this. The energy manager program, delivered through the Independent Electricity Systems Operator (IESO), was immensely successful for the mining industry in helping achieve energy savings.

Thank you for considering OMA's comments for the upcoming Electricity Energy Efficiency Framework. The OMA strongly supports the continued delivery of the program through the IESO and moving to a rolling long term EE framework. We appreciate the ministry's continued commitment to install "consumer confidence that our clean electricity system will remain reliable and affordable over the long term" and would welcome the opportunity to discuss these comments further. ¹

Best,



Kankshi Amin
Energy Policy Advisor

¹ Ontario's Affordable Energy Future: The pressing case for more power. ontario.ca. (2024, October 29).
https://www.ontario.ca/page/ontarios-affordable-energy-future-pressing-case-more-power?utm_source=newsletter&utm_medium=email&utm_campaign=iesobulletin