

December 28, 2024

Hon. Stephen Lecce  
Ministry of Energy and Electrification  
10th Floor  
77 Grenville St.  
Toronto, ON M7A 2C1

**Re: Proposed amendment to regulations under the Ontario Energy Board Act, 1998 to further streamline approvals for pipeline relocations or reconstructions to build infrastructure projects faster.**

Dear Minister Lecce,

Ontario Greenhouse Vegetable Growers (OGVG) support the proposed expansion of exceptions from the Ontario Energy Board's (OEB) leave-to-construct (LTC) requirements for pipeline relocations and reconstructions. Ontario's fast growing greenhouse sector has maintained 6% annual growth over the last decade due to support from essential pipeline infrastructure, which delivers both natural gas for heating and CO2 from natural gas combustion. Amending the exceptions to include economic growth, specifically greenhouse agriculture, is essential to continue the sector's 6% growth and meet the population's demand for fresh produce while ensuring continued job creation. Ontario's greenhouse sector comprises 170 farming families who manage over 4,000 acres of fresh cucumbers, peppers, and tomatoes. Together greenhouse farms generate \$1.6 billion in farmgate revenues and provide more than 32,000 high-quality jobs across the agri-food value chain.

Expanding the regulation to allow for exceptions from the OEB's LTC requirements for pipeline relocations and reconstructions to facilitate any type of infrastructure project or external relocation request is essential to support growth. Maintaining the same conditions currently in place in section 3 of *Ontario Regulation 328/03*, including the adequate discharge of the duty to consult, maintains the rigour required of the regulatory update. OGVG fully supports the expansion such that:

1. "Essential projects" include support of the agricultural sector, such as greenhouse construction,
2. "Essential Infrastructure" include inputs for economic growth such as water and wastewater lines.

Greenhouses are operated year-round, facilitating infrastructure projects and pipelines is essential to support continued greenhouse growth and expansion. Streamlining infrastructure development supports the growth of economic drivers such as greenhouses which further contribute to Ontario's economy.

Sincerely,



Richard Lee  
Executive Director