

December 12, 2024

Hillary Armstrong
Manager, Coordination Policy
Ministry of Energy and Electrification
77 Grenville Street
Toronto, ON
M7A 2C1

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

Dear Hillary Armstrong,

RE: ER-019-9285 Integrated Energy Resource Plan Consultation

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to provide a rural and agricultural perspective on the proposed Integrated Energy Resource Plan. 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.

Access to a variety of reliable and affordable energy sources is critical to Ontario's farm sector, rural businesses and residents. The Minister of Energy and Electrification has recognized that in addition to different timelines needed in different regions to reach decarbonization targets, many rural regions need access to a variety of fuel sources during that transition. This means that propane, natural gas, biogas, renewable natural gas (RNG) and hydrogen fuels will be critical molecules for heating, ventilation, transportation and equipment in rural regions.

OFA recommends the Ministry consider methods to ensure a pathway exists for emissions reductions in the production and use of these fuels. This would include a commitment to a price for renewable diesel, renewable propane and RNG, expanding emission reduction credit markets to participation in other provincial and state credit markets, and assisting local governments in developing energy plans to meet regional priorities while reaching our provincial goals.

Planning for Growth

The proposed Energy Efficiency Framework will align planning across electricity, renewable energy sources and fossil fuels. To enhance this approach, and to promote greater access to grid-connections that will support economic growth, OFA recommends Ontario consider an agricultural stream for IESO transmission system capacity and energy procurements. Energy produced on-farm that is integral to the farm operation should qualify for IESO procurements without losing Rated Criteria Points.

This would include on-farm Diversified Uses that demonstrate compatibility with, and integrate into, agricultural activities common in the area. Such projects would: manage agricultural source materials, use agricultural feedstocks, improve erosion risks or other soil conditions, generate byproducts such as soil amendments, or produce heat or CO₂ that are primarily utilized by surrounding farm operations.

For example, a CHIP (combined heat and power) unit for CO₂ production used in a greenhouse, or an anaerobic digestion unit used to better manage manure in a livestock or poultry operation, are integral to the farm operation and can contribute excess capacity to the system.

Affordable and Reliable Energy

Related to empowering businesses to generate or store energy on-site to reduce costs and improve resiliency, OFA recommends the Ministry consider expanding conservation and efficiency programming and Save On Energy programming for small businesses to retain energy management consultants and to adopt innovative technologies.

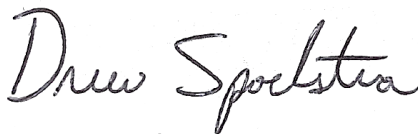
To better integrate municipal, distributor and regional planning processes, Distributed energy resources (DERs) in rural communities should be afforded consideration for transmission grid and distribution level procurements, and may need to qualify at thresholds below 1 MW in the near term to help prove the concept for numerous rural and regional communities.

To ensure local electricity systems can accommodate DERs, government should consider regulatory changes to enable rural system resiliency and capacity upgrades. DERs present a new line of business for local distribution companies while improving grid efficiency.

OFA supports the Electrification And Energy Transition Panel recommendations that Ontario review energy regulator activities to determine legislative and regulatory changes needed to implement an affordable and reliable integrated energy system.

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

Sincerely,



Drew Spoelstra
President

cc: OFA Board of Directors