

Andrew J. Sasso
Director, Regulatory Affairs & Government Relations
Toronto Hydro-Electric System Limited
14 Carlton Street; Toronto, ON M5B 1K5
regulatoryaffairs@torontohydro.com



December 8, 2024

Ontario Ministry of Energy
77 Grenville Street
Toronto, ON
M7A 2C1

Submitted via Environmental Registry Comments

**Re: New Proposal for Electricity Energy Efficiency Programming to Promote Beneficial Electrification
(ERO number 019-9373)**

Toronto Hydro-Electric System Limited ("Toronto Hydro") is the local electricity distribution company for the City of Toronto. It serves over 790,000 customers and delivers about 18% of the electricity used in Ontario.

On November 8, 2024, the Ministry of Energy opened for comment a proposal to include beneficial electrification programming under the proposed 2025–2036 electricity energy efficiency framework. This programming would be coordinated with other energy efficiency programs offered by the IESO and would be targeted towards offering electricity measures for currently non-electric end-uses. Toronto Hydro is supportive of the proposal, and offers the following brief comments for the Ministry's consideration.

Toronto Hydro has a long and successful history with advancing conservation and demand management initiatives ("CDM") in the province, and expects to continue in this role within the new energy efficiency framework. From 2006 to 2015, Toronto Hydro's conservation efforts produced 1.7 TWh in total energy savings, equivalent to taking 600 large condo towers off the grid: an average of more than one per week, every week, for 10 years. Over the entire 14-year period from 2006 to 2019 during which Toronto Hydro provided CDM programs, it helped deliver nearly one million residential and commercial CDM projects in Toronto worth a total value of approximately \$1.9 billion, that led to approximately 3.6 TWh in energy savings and generated approximately 1.4 Mt CO₂e in GHG reductions. Toronto Hydro is supportive of the renewal of the electricity energy efficiency framework, including in particular its intent to increase local distribution company ("LDC") involvement. As Ontario's demand is set to grow by 75%

by 2050 (and Toronto's alone between 70% and 100% by 2044¹), LDCs will have critical roles to play in the energy transition, as well as advancing other key provincial policy priorities.² Decarbonizing the grid, building housing for a growing province, keeping Ontario moving through priority transit projects, and maintaining a safe, reliable, and affordable energy system all depend on robust utility involvement. Toronto Hydro believes that Ontario has an opportunity to be a leader in conservation by putting LDCs at the forefront of energy efficiency programs that would deliver long-term benefits to Ontario's electricity customers.

Toronto Hydro is strongly committed to electrification as a pathway to lowering overall energy bills. The electrification initiative has multiple benefits; from contributing to the City of Toronto's Net Zero objectives, to providing customer choice and energy savings. To this end, Toronto Hydro is supportive of the Ministry's proposal to include beneficial electrification programming within the new energy efficiency framework, and expects that a comprehensive look at energy choice will lead to greater efficiencies and benefits within the energy efficiency framework and the energy sector more broadly.

Toronto Hydro appreciates the opportunity to provide comment on this issue, and looks forward to continued involvement within the Province's new energy efficiency framework and its drive towards electrification.

Sincerely,

A handwritten signature in blue ink that reads "Andrew J. Sasso".

Andrew J. Sasso
Director, Regulatory Affairs & Government Relations
Toronto Hydro-Electric System Limited

AJS/jl

¹ IESO Toronto IIRP Presentation – December 5, 2024:
<https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Toronto/toronto-irrp-20241205-presentation.pdf>

² Electrification and Energy Transition Panel, Ontario's Clean Energy Opportunity, December 2023.