environmental defence
INSPIRING CHANGE

January 16, 2025

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Dear Mr. Spohr,

Re: Consultation on the Natural Gas Policy Statement

I am writing to provide comments on Ontario's new Natural Gas Policy Statement.

The most cost-effective gas policy for Ontario would be to follow the lead of its largest neighbours – New York State and Quebec. New York State is phasing out gas in most new construction starting in 2026.[1] Quebec is prohibiting all fossil fuel heating in most new and existing buildings as of 2040.[2] These are large jurisdictions (~30 million people combined) with extensive resources to determine the optimal gas sector policies. They represent different points on the political spectrum – the right-leaning Coalition Avenir Québec and left-leaning Democrats. But the experts and politicians in these jurisdictions both know the same thing – the most cost-effective way to decarbonize buildings is by electrifying them, and the sooner we stop wasting money on gas infrastructure, the better we will be able to keep energy prices down.

However, if the Ontario Government chooses to ignore the best approach for consumers which is to phase out gas in new construction and prohibit fossil fuel heating by 2040, it should at least consider the following recommendations. They are based on the government's own Electrification and Energy Transition Panel ("EETP") report and its recent policy set out in *Ontario's Affordable Energy Future: The Pressing Case for More Power*. The focus is on affordability both today and in the future.

At a high level, Ontario's policy statement should recognise that:

- Continued high gas infrastructure spending is risky and could undermine long-term affordability, endanger gas system viability, compromise the ability of the gas system to help decarbonize hard-to-electrify industrial sectors, and reduce customer choice;

- Electric heat pumps are the cheapest way to heat homes, both now and even more so when compared to expensive renewable gases in a decarbonized future;

[1] CBC, *New York State bans gas stoves, furnaces in many new buildings,* May 3, 2023 (link).
[2] CBC, *Quebec to ban fossil fuel natural gas heating in homes by 2040*, November 19, 2024 (link).

- Electrification is the cheapest way to decarbonize buildings and also the best option for economic growth and jobs, as it replaces imported gas with made-in-Ontario electricity; and

- Energy bills should be lowered by implementing all energy efficiency programming that is cost-effective and by minimizing the costs to build all-electric developments.

We have responded to the discussion questions below, but in a different order than they were posed.

What role should natural gas play in supporting energy affordability and customer choice in residential and small commercial applications (e.g., space and water heating)?

Gas should play a declining role in the residential and small commercial sector (i.e. heating Ontario's buildings). As detailed below, this is essential to maintain affordability today, maintain affordability in a decarbonized future, minimize costs in decarbonizing buildings, create jobs, grow the economy, maintain choice, maintain gas system viability, and reduce carbon emissions.

- **Affordability today:** For a very long time, methane gas (aka natural gas) was the cheapest way to heat homes. That is no longer the case, and the policy statement should reflect that. Electric cold climate heat pumps are now much cheaper than gas for home heating.[3] Annual costs are lower because heat pumps are approximately three times more efficient than gas furnaces (or five times for ground-source heat pumps, also known as geothermal) and because customers can avoid paying monthly charges to use the gas system.[4] Heat pumps are so efficient because they *move* heat instead of *converting* gas or electricity into heat. Standard gas and electric heating cannot surpass 100% efficiency, whereas heat pumps can be multiple times more efficient – they can use 1 kW of electricity to move 3 kW of heat (or more) indoors. They can do this even in cold temperatures because, counterintuitively, there is still a great deal of heat energy in very cold air.[5]

- **Affordability tomorrow:** In a decarbonized future, the savings from heat pumps are even greater. It is roughly five times cheaper to heat a home with a heat pump using 100% clean electricity versus a furnace using renewable gas.[6] This is consistent with the

[3] Evidence of the Energy Futures Group in Ontario Energy Board ("OEB") File # EB-2022-0200, p. 23 (link); Dr. Heather McDiarmid, *An Analysis of the Financial and Climate Benefits of Electrifying Ontario's Gas-Heated Homes by Installing Air-Source Heat Pumps*, August 2, 2022, p. 11 (link).
[4] National Resources Canada, *Heating and Cooling With a Heat Pump*, (link).
[5] National Resources Canada, *Heating and Cooling With a Heat Pump*, (link) ("It may be surprising to know that even when outdoor temperatures are cold, a good deal of energy is still available that can be extracted and delivered to the building. For example, the heat content of air at -18°C equates to 85% of the heat contained at 21°C. This allows the heat pump to provide a good deal of heating, even during colder weather.")
[6] Evidence of the Energy Futures Group in Ontario Energy Board ("OEB") File # EB-2022-0200, p. 25 (link); Furthermore, Mr. Neme identifies three additional factors that will even further improve the economics of electrification: (a) the ability of electrifying customers to avoid fixed gas charges; (b) increasing gas distribution rates as customers exit the system; and (c) additional investments to make up for the fact that RNG is not always carbon neutral.

finding of the EETP that "it is unlikely the natural gas system can be fully decarbonized and continue to deliver cost-effective building heat."[7]

- **Cheapest decarbonization pathway:** The most cost-effective way to decarbonize buildings in Ontario is through large amounts of electrification.[8] This has been proven with detailed cost-optimization studies that address all the costs necessary to grow the electricity system.[9] Gas system lobbyists say that electrification will cost more than using low-carbon gases using misleading figures. The only true cost-optimization studies have clearly shown electrification to be the most cost-effective pathway.[10]

- **Jobs and economic growth:** Billions of dollars leave Ontario to pay for out-of-province gas each year. Electrifying new and existing buildings will help create jobs in made-in-Ontario electricity projects and ongoing economic growth.

- **Healthy homes:** Gas equipment, especially stoves, emit toxic gases into homes, which can contribute to respiratory problems, especially in children, seniors, and asthma sufferers.[11] One study found that 13% of childhood asthma in the United States is attributable to gas stove use.[12] Electric equipment results in cleaner air and healthier families.

- **Convenience:** Induction stoves heat water faster than gas, are easier to clean, and are much safer for children as the surface does not get hot.[13] Heat pumps are stronger and more efficient than traditional air conditioners, providing better and cheaper cooling in the summer.[14] These are just some of the additional benefits of electric equipment.

- **Choice and gas system viability:** Investments in gas infrastructure need to be minimized today to maintain choice and gas system viability. If investments do not slow, rates will need to increase to cover those costs as customers leave the system for heat pumps, which could undermine viability of the gas system and customer choice. As stated by the EETP: "[T]here is a real risk of stranding assets in home heating and the gas distribution grid over the medium to long-term, with significant risk to customers, investors and public finances."[15]

- **Carbon emissions:** What we often call natural gas is actually methane gas, which is a potent greenhouse gas. Burning methane gas causes approximately one-third of our carbon pollution here in Ontario, and that does not even include the additional emissions

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[7] *Ontario's Clean Energy Opportunity: Report Of The Electrification And Energy Transition Panel*, December 2023, p. 92 (link).
[8] Canadian Climate Institute, *Heat Exchange*, p. 10 (link).
[9] Canadian Climate Institute, *Heat Exchange*, p. 10 (link); ESMIA/Dunsky, *Cost Effective Energy Pathways Study for Ontario*, 2024.
[10] *Ibid*.
[11] CBC, *After seeing how gas stoves pollute homes, these researchers are ditching theirs*, April 7, 2022 (link).
[12] Taylor Gruenwald et al, Population Attributable Fraction of Gas Stoves and Childhood Asthma in the United States, Int. J. Environ. Res. Public Health 2023, 20(1), 75 (link).
[13] CBC, *Professional chefs tout the culinary — and environmental — advantages of induction stoves*, April 7, 2022 (link).
[14] Evidence of the Energy Futures Group in OEB File # EB-2022-0200, p. 22 and footnote 48 (link).
[15] *Ontario's Clean Energy Opportunity: Report Of The Electrification And Energy Transition Panel*, December 2023, p. 92 (link).

from the fracking process or leaks throughout the system.[16] We cannot achieve net zero without eliminating the use of methane gas for building heating.[17]

Low carbon gases are not a realistic alternative to electrification of Ontario's buildings because they are expensive and cannot replace more than a tiny proportion of Ontario's current fossil methane use. The IESO, Canadian Biogas Association, and the Canada Energy Regulator have all estimated the RNG potential in Ontario to be in the range of 2.5% of our fossil methane gas use.[18] In addition, this scarce resource will be needed for the hardest-to-decarbonize sectors. Hydrogen can only replace less than 0.5% of the current fossil methane gas consumption when fossil methane gas is phased out and only RNG and hydrogen remains.[19]

Gas cannot be eliminated immediately. But gas infrastructure spending must be cut immediately to ensure that the decisions made today are consistent with an affordable future in which almost all building heat is electrified.

What role should natural gas play in supporting economic development in Ontario's industrial and agricultural sectors, including those processes that may be difficult to electrify?

RNG and 100% green hydrogen can play a role in helping to decarbonize the hardest to electrify sectors such as the cement industry and heavy-duty transportation. This is an important potential function for the gas system in the future. However, affordability of the gas system for this function depends on major declines in gas infrastructure spending, including a decline in the $250 million spent annually on infrastructure for new gas connections. If this spending continues unabated, the system will become unaffordable for a future role in decarbonizing the hardest to electrify sectors.

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[16] Enbridge Evidence in Ontario Energy Board File #EB-2022-0200, Exhibit 1, Tab 10, Schedule 3, Page 2 (link, PDF p. 165). upstream leaks add at least an additional 40% to the harmful climate impact (likely more if the latest science and measurements are used); Heating homes and businesses with gas accounts for approximately 19% of Ontario's greenhouse gas emissions per Dr. Heather McDiarmid, An Analysis of the Financial and Climate Benefits of Electrifying Ontario's Gas-Heated Homes by Installing Air-Source Heat Pumps, August 2, 2022, p. 8 (link).

[17] See attachment 2 below and the submissions of Environmental Defence, p. 6-8 (link).

[18] IESO Correspondence (link, Ex. K2.2, PDF p. 221); IESO Pathways to Decarbonization Study, Appendix B, p. 27 (link, Ex. K2.2, PDF p. 221); Hearing Transcript Vol. 2 in OEB File #EB-2022-0200, p. 106, lns. 13-24 (link); Hearing Transcript Vol. 2, p. 100, lns. 1-5 (link); Canadian Biogas Association study, p. 71 (link, Ex. K2.2, PDF p. 184); cited by Guidehouse in Exhibit I.1.10-ED-35 (link, Ex. K2.2, PDF p. 99); Hearing Transcript Vol. 5, p. 176, ln. 3 to p. 177, ln. 8 (link).

[19] Hydrogen can only be blended into methane gas pipelines at up to 7.3% by energy content (which is 20% by volume, and even those low levels may still be unsafe). See Exhibit J2.11 (link, PDF p. 30). If the RNG potential is very optimistically assumed to be 5% of current fossil methane gas consumption (e.g. assuming technological breakthroughs and ignoring price issues), and hydrogen is blended in at 7.3% by energy content, that means that hydrogen is only able to replace 0.37% of the current fossil methane gas consumption in a decarbonized gas system. (Calculation: 5% x 7.3% = 0.037%).

What role should the government play in supporting and expediting the rational expansion of the natural gas system to make home heating more affordable and support economic growth in communities that are seeking natural gas service?

The government should support affordable home heating by subsidizing heat pumps, not by subsidizing the expansion of the gas system. For more details, see our submissions on the future of the natural gas expansion program and home heating affordability.

For communities seeking a natural gas service, the Ontario Government should counteract the deceptive marketing that has been disseminated throughout Ontario by Enbridge and to municipal leaders stating that gas is the cheapest way to heat homes, when it is not. The Competition Bureau has commenced an investigation into this deceptive marketing.[20]

Ontario should support economic growth by promoting electrification. Electric heating is much better for our economy than gas heating. Spending on gas flows out of the province and is lost to our economy. Spending on electricity will fund the growth of made-in-Ontario electricity generation, distribution, and transmission, creating good jobs, economic growth, and government revenue.

For natural gas expansion projects receiving government support, should the approvals processes be streamlined to support affordable home heating for Ontarians? In what ways?

Approvals processes regarding gas infrastructure processes could be improved by expecting the gas utility to file applications sooner. Beyond this, additional streamlining is not in the interest of customers. The approval process is the only evidence-based opportunity to ensure that proposed spending is truly needed and that the financial parameters are appropriate. Without these processes, there is a significant risk of unnecessary capital spending. The threshold for gas infrastructure approvals was recently increased from $2 million to $10 million. This slackening of approvals processes should be reversed, not taken further. Furthermore, we strongly believe that further expansion of the natural gas network cannot be justified. Homes and businesses that are reliant on heating oil, or propane can be transitioned to heat pumps at a fraction of the costs of expanding the gas network. Homes reliant on electric heat can also switch to heat pumps easily and cost effectively.

What role should natural gas play in supporting power system security and resiliency?

All fossil fuel electricity generation must be phased out. Detailed analysis finds that this can be done while also lowering consumer energy bills.[21] We do not need to choose between electrifying transportation and buildings *or* decarbonizing the electricity system. Both can be achieved while still lowering energy bills. Recent procurements of battery energy storage systems have shown that batteries can serve the same function as gas at a much lower cost.

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[20] National Observer, *Competition Bureau launches investigation into Enbridge over deceptive marketing*, January 11th, 2024 (link); *Competition Act Application* (link).
[21] Canadian Climate Institute, *The Big Switch*, May 2, 2022, p. 16 (link); OCAA, *Zero Emissions Report,* January 19, 2022 (link).

What role should natural gas play in offsetting higher GHG-emitting fuel sources?

Fossil-based methane gas has no role to play in offsetting higher GHG-emitting fuels. Although gas was once considered by some to be a "transition fuel", that is no longer the case. We now know that gas is almost as bad for climate change as coal based on the latest science about the size and impacts of methane emissions during extraction, transportation, and in consumer equipment.[22] Those emissions are in addition to the combustion emissions that already create one-third of Ontario's carbon emissions.

Gas has no role to play in offsetting oil or propane heating. It makes no sense to spend considerable sums converting from oil or propane to gas heating when heat pumps result in lower energy bills. It is a waste of money to convert from higher GHG-emitting fuels to fossil gas in other contexts. The potential GHG reductions (if any) are small and the cost of infrastructure cannot be recouped before a full transition to electricity is needed. The investments are much better spent elsewhere.

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[22] Based on the default value for the Clean Fuel Standard, upstream emissions add over 40% on top of the combustion emissions for fossil methane gas. The impact of upstream emissions is even greater if one focuses on the next twenty years, which many experts argue is critical when considering policies aimed at avoiding catastrophic climate change. A tonne of methane is estimated to have 84 times the warming power of carbon dioxide over a 20-year period.

The picture is even worse because upstream emissions are considerably higher than those recorded in national inventories. Canada has acknowledged this in its official National Inventory Report. Studies cited in Canada's own National Inventory Report suggest that the actual upstream emissions are roughly twice those indicated in the National Inventory Report. These discrepancies arise because the inventories are based on "industry self-reported bottom-up estimates" and there is "near scientific consensus that these self-reported bottom-up estimates are far below the actual emissions rates determined through top-down methodologies based on data collected from aircraft and satellites." See Canada's National Inventory Report (link, Ex. K2.2, PDF p. 6); Studies cited in the National Inventory Report suggesting that actual upstream emissions are roughly twice those reported in the National Inventory Report: KT9.5 (link); Exhibit KT9.6 (link). See also Exhibit N.M10.EGI.108, Attachment 2 (link, PDF p. 3); Exhibit M10 (link, PDF p. 5).

Studies of downstream methane leaks in cities across North America are also finding that actual top-down measurements find far higher emissions in comparison to bottom-up estimates used for official inventories. Enbridge has acknowledged that they do not have an estimate for the actual upstream emissions nor measurements for behind-the-meter leaks in Ontario. See Exhibit N.M10.EGI.108, Attachment 2 (link, PDF p. 3); See also Exhibit K2.2, Tab 3 (link, PDF p. 12); Hearing Transcript Vol 2, p. 79, lns. 16-26 & p. 80, lns. 9-12 (link).

There is no doubt that fossil methane gas is extremely harmful to the climate and must be eliminated over the next 30 years based on the combustion emissions alone. Depending on the true extent of the lifecycle emissions, fossil gas could be worse than coal, in which case these emissions need to be eliminated even faster. See Exhibit M10, p. 14 (link, PDF p. 14).

See also Environmental Defence Canada's backgrounder on Ontario's fracked gas (link).

What are the challenges and opportunities for enhanced energy efficiency, adoption of clean fuels (e.g., RNG, Hydrogen) and emission reduction methods (e.g., carbon capture and storage) to lower emissions in the natural gas system?

Energy efficiency

Ontario should expand energy efficiency for gas customers to capture all energy efficiency measures that are cost-effective. Cost-effective energy efficiency programs lower energy bills because the value of the benefits (primarily gas savings) outweigh the costs. There is a huge opportunity to help lower energy bills across the province by expanding and improving energy efficiency programs.[23]

Although all cost-effective energy efficiency should be achieved, this can only address a portion of the GHG emissions from fossil gas. Electrification is ultimately required.

RNG and hydrogen

RNG and hydrogen could play an important role in decarbonizing hard-to-electrify sectors. However, they are too expensive and limited in availability to help decarbonize the bulk of the gas system, which is used to heat buildings.

Heating with decarbonized gas is much more expensive than heating with decarbonized electricity[24] and the most cost-effective pathway to decarbonize buildings is via electrification.[25]

But even putting price aside, low carbon gases cannot replace more than a tiny proportion of Ontario's current fossil methane use. The IESO, Canadian Biogas Association, and the Canada Energy Regulator have all estimated the RNG potential in Ontario to be in the range of 2.5% of our fossil methane gas use.[26] In addition, this scarce resource will be needed for the hardest-to-decarbonize sectors. Hydrogen can only be blended into methane gas pipelines at up to 7.3% by energy content (which is 20% by volume, and even those low levels may still be unsafe).[27] If the RNG potential is very optimistically assumed to be 5% of current fossil methane gas consumption (e.g. assuming technological breakthroughs and ignoring price issues), and hydrogen is blended in at 7.3% by energy content, that means that hydrogen is only able to replace 0.37% of the current fossil methane gas consumption in a decarbonized gas system.[28]

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[23] Navigant, Natural Gas DSM Potential Study, 2024 (link).
[24] Evidence of Chris Neme, May 11, 2023 (updated May 30th), Ex. M9, p. 25 (link). Furthermore, Mr. Neme identifies three additional factors that will even further improve the economics of electrification: (a) the ability of electrifying customers to avoid fixed gas charges; (b) increasing gas distribution rates as customers exit the system; and (c) additional investments to make up for the fact that RNG is not always carbon neutral.
[25] *Ontario's Clean Energy Opportunity: Report Of The Electrification And Energy Transition Panel*, December 2023, p. 92 (link); Canadian Climate Institute, *Heat Exchange*, p. 10 (link); and ESMIA/Dunsky, *Cost Effective Energy Pathways Study for Ontario*, 2024.
[26] IESO Correspondence (link, Ex. K2.2, PDF p. 221); IESO Pathways to Decarbonization Study, Appendix B, p. 27 (link, Ex. K2.2, PDF p. 221); Hearing Transcript Vol. 2 in OEB File #EB-2022-0200, p. 106, lns. 13-24 (link); Hearing Transcript Vol. 2, p. 100, lns. 1-5 (link); Canadian Biogas Association study, p. 71 (link, Ex. K2.2, PDF p. 184); cited by Guidehouse in Exhibit I.1.10-ED-35 (link, Ex. K2.2, PDF p. 99); Hearing Transcript Vol. 5, p. 176, ln. 3 to p. 177, ln. 8 (link).
[27] Exhibit J2.11 (link, PDF p. 30).
[28] Calculation: 5% x 7.3% = 0.037%.

This is in addition to other major barriers to decarbonizing a significant portion of our buildings with gas.[29]

Carbon capture and storage

Carbon capture is too expensive and does not capture a sufficient portion of GHG emissions[30]. But even if there were economic and technical breakthroughs, this technology does nothing for the large portion of the gas consumption in Ontario that is used to heat buildings. Furthermore, Ontario has very limited storage potential and if the province proceeds with carbon capture and storage, should be used solely to decarbonize hard-to-electrify sectors such as the cement industry

What principles should the government provide to the OEB to help inform the Board's ongoing development of natural gas connection policies?

Encourage most affordable heating options

The government should direct the OEB to ensure that developers do not have a disincentive to build all-electric developments. This disincentive was highlighted by the ETTP, which stated as follows:

> "For example, the up-front cost discrepancy might dissuade a residential developer from developing an 'all electric' or low carbon neighbourhood, and persuade them to instead build a traditional, natural gas-connected development to keep upfront costs manageable.
>
> This example highlights the complexities of the natural gas governance framework, and how adjustments may be required to facilitate electrification and the energy transition. Levelling the playing field between electricity and natural gas might encourage developers and other customers to make choices that are more aligned with government's clean energy economy commitment. Given the provincial government's commitment to significantly expedite the construction of new housing and target 1.5 million new homes by 2030, regulatory action could be a significant support and ensure alignment with an overarching clean energy economy commitment."[31]

Developers should have an incentive to install the most affordable heating options – heat pumps. Removing the disincentive to create all-electric developments would benefit home buyers who would achieve lower energy bills via heat pumps. These customers would also be able to avoid retrofit costs down the road because their homes and the local electricity infrastructure will already be ready for a decarbonized future.

The government should ensure that the scope of the upcoming review includes potential additional adjustments to the electricity system connection policies. This would help enable

[29] Submissions of Environmental Defence, September 19, 2023, p. 4-20 (link).
[30] Environmental Defence Backgrounder on CCUS, December 2021, (link).
[31] *Ontario's Clean Energy Opportunity: Report Of The Electrification And Energy Transition Panel*, December 2023, p. 96 (link).

changes that would both remove the disincentive to build all-electric developments while also decreasing the cost of development. For example, electricity distributors should be allowed to recoup the cost of connecting an all-electric development via customer surcharges that equal up to the amount that those customers will save from avoiding ongoing gas distribution system charges. This would greatly reduce the cost of all-electric developments, while also benefiting customers through lower energy bills.

Minimize risks

The government's policy statement should include the following guidance from the EETP:

> "…it is in the interest of the province, for the purpose of customer protection, to ensure that the regulatory mechanisms for the governance of the natural gas grid are aligned with a range of plausible outcomes, notably those that pose the greatest risks to customers."[32]

The EETP's point is this: we don't know whether customers will electrify quickly or more gradually, but the gas system must be ready for both scenarios.

Enbridge's spending on customer connections is expensive and risky. It spends approximately $250 million annually on infrastructure needed to connect new customers. That infrastructure spending is added to the accumulated capital costs (i.e. rate base) that ratepayers pay off over 60 years.[33] As customers leave the gas system (e.g. to lower energy bills with heat pumps or eliminate toxic fumes from gas stoves), there will be fewer customers to pay off those accumulated capital costs, leading to increasing rates.

If we continue to add $250 million in costs annually for new customer connections, we could end up with rates spiraling out of control when customers leave while accumulated capital costs are high. By adjusting the gas connection rules and cost allocation, the OEB can greatly reduce that risk.

Overall guiding principles

The Natural Gas Policy Statement should include the following overall guiding principles. These principles would help to guide consideration of a wide variety of issues relating to the future of the gas system without being overly prescriptive. They would help protect affordability, choice, and gas system viability:

- **Maximize energy efficiency savings:** Customers should have access to all gas sector energy efficiency programming that is cost-effective (i.e. where benefits outweigh costs). This will immediately lower energy bills.

[32] *Ontario's Clean Energy Opportunity: Report Of The Electrification And Energy Transition Panel*, December 2023, p. 94 (link).
[33] Exhibit I.4.5-ED-138 (The depreciation periods for new mains and services are between 55 and 60 years.) (link, PDF p. 1529)

- **Minimize decarbonization costs:** Gas system planning and regulation should be consistent with the most cost-effective pathway to decarbonize Ontario's buildings and other gas uses. This is necessary maintain long term affordability and choice.

- **Protect from energy transition risks:** Gas regulation should be aligned with a range of plausible outcomes of the energy transition, including those that pose the greatest risk to customers. This is an important recommendation of the EETP.[34]

- **Facilitate bill savings via electrification:** Energy regulation should minimize the cost to build all-electric developments and to electrify existing buildings to help customers achieve lower energy bills.

- **Focus on hardest-to-decarbonize sectors:** Long-term plans for the gas sector should focus on helping heavy industry decarbonize. This would include earmarking low-carbon gases for hard-to-decarbonize sectors and by avoiding excessive gas infrastructure investments that will make the gas system unaffordable for industry in a decarbonized future.

Conclusion

Fossil methane gas consumption is not disappearing in the short term, but the infrastructure being built today will be paid off in the 2080s, and so we must consider future scenarios in decisions made today. Although energy consumers would benefit from a more decisive approach along the lines of the policies being carried out in New York State and Quebec, Ontario can still make progress toward long-term energy affordability with a Natural Gas Policy Statement that recognises the risks of ongoing high gas infrastructure spending and the benefits of energy efficiency, electrification, and all-electric residential developments.

Thank you for considering these comments. Please contact us if you have any questions regarding the above.

Keith Brooks
Programs Director
Environmental Defence

[34] *Ibid*.