



LiUNA!

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BRENT BOOKER
General President

January 14, 2025

MICHAEL F. SABITONI
General Secretary-Treasurer

Mr. Nik Spohr
Ministry of Energy and Electrification
77 Grenville Street
Toronto, ON M7A 2C1

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Sent via email: nik.spohr@ontario.ca
and formally submitted through
the ERO submission portal.

JOSEPH S. MANCINELLI
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DENNIS L. MARTIRE

Dear Mr. Spohr:

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Re: The Labourers' International Union of North America (LiUNA) Response to a Consultation to Support the Important Role for Natural Gas in Ontario's Energy System and Economy (ERO Posting #019-9501)

Background

The Labourers' International Union of North America (LiUNA) is pleased to comment and provide recommendations on the Ministry of Energy and Electrification's Environmental Registry of Ontario (ERO) request #019-9501 to help inform the government's policy on natural gas and the long-term role natural gas should play in the province's energy system.

United by collective bargaining agreements, LiUNA is a powerhouse of workers who are proud to build Ontario. Our members are a skilled and experienced union workforce trained to work safely in the construction and energy industries. A half-million strong, with over 120,000 in Ontario, LiUNA's skilled workforce will play an incremental role in ensuring Ontario has the proper mix of energy infrastructure to effectively service the province's growing electricity demand.

Supporting Natural Gas Long-term

LiUNA understands the role natural gas plays today in delivering reliable, resilient and affordable energy to customers in Ontario. We also recognize the potential it has to play in the medium to long-term as natural gas already makes up almost 40

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per cent of Ontario's total energy use.¹ Due to natural gas's existing infrastructure and its flexibility to be deployed when and where Ontarians need it most, LiUNA views natural gas as irreplaceable in Ontario's energy mix and critical in a time where the province is projecting a 75% increase in Ontario's electricity needs by 2050.²

Understanding the projected demand forecast and what is on the horizon for Ontario industrially, LiUNA believes government must move forward with a natural gas policy that allows natural gas to maintain its prominence in the province as a reliable and cost-effective option to fuel our growing economy.

LiUNA's response to select consultation questions below highlight our support for natural gas continuing to play an essential role in Ontario's energy system long-term. We trust that this feedback will help inform your government as your Ministry moves forward with a natural gas policy.

Consultation Questions

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

LiUNA is supportive of the government taking the necessary action through policy to ensure natural gas can remain an accessible, reliable and affordable energy source for Ontarians. Supporting access to natural gas connections across the province, increasing customer choice and ensuring that natural gas connections remain affordable for all customers will be important when considering principles that should be included in the province's policy statement on natural gas.

LiUNA is cognizant that new customers should not be unfairly burdened by the costs of infrastructure expansion which is becoming increasingly necessary as the province continues to exponentially grow its electricity demand. A policy that can ensure natural gas infrastructure can remain reliable, resilient and affordable long-term will be important as Ontario is currently in a precarious position where demand will only become more challenging to meet if the proper energy infrastructure and energy planning has not taken place.

¹ "Ontario's Affordable Energy Future: The Pressing Case for More Power." Ontario, October 24, 2024. <https://www.ontario.ca/page/ontarios-affordable-energy-future-pressing-case-more-power>.

² "IESO Updated Demand Forecast," IESO, October 17, 2024. <https://www.ieso.ca/Sector-Participants/IESO-News/2024/10/IESO-Releases-Updated-Demand-Forecast>.

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

As a union publicly known for supporting an “all-of-the-above” energy policy, LiUNA members work in every area of the energy sector helping to build transmission and distribution facilities, power plants and gas pipelines. We are known as a union that supports the use of natural gas as part of Ontario’s balanced energy mix as it can support system security and reliability and act as a bridge fuel in transitioning to cleaner energy sources long-term. As natural gas can be deployed when and where Ontarians need it most, it serves as a reliable power back up in an instance where other forms of power may not be available due to system disruptions.

LiUNA in the near-term does not see a future where Ontario will not be reliant on the power natural gas provides to the province. Our focus is on ensuring Ontario has the skilled labour required to support the natural gas industry and the energy sector at large. LiUNA is committed to working with government on mitigating the challenges impacting the growth of the skilled trades as this will be a top priority as natural gas and other energy resources will need to play a leading role in supporting power system security and resiliency as Ontario faces significant changes to its levels of electricity demand.

Conclusion

In summary, LiUNA would like to thank the Ministry of Energy and Electrification for the opportunity to provide input to help shape the role for natural gas in Ontario’s energy system and economy. As an affordable, reliable and domestically produced supply of electricity is the foundation of a stable, Ontario-driven growth strategy, we are strongly supportive of the use of natural gas long-term and encourage government to remain aware of the labour component that continues to play an important role in the growth of the natural gas sector and ensuring natural gas connections remain accessible. Moreover, we would be happy to meet with you at your earliest convenience to discuss our feedback further.

With kind regards, I remain

Sincerely,



Joseph S. Mancinelli
International Vice President
Canadian Director, and
Central & Eastern Canada Regional Manager

cc: The Honourable Doug Ford, Premier
The Honourable Stephen Lecce, Minister of Energy and Electrification
The Honourable Sam Oosteroff, Associate Minister
for Energy-Intensive Industries
The Honourable Vic Fedeli, Minister of Economic Development,
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