

P.O. Box 756  
Toronto, ON  
M5C 2K1



**APPRO**

ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

Ministry of Energy and Mines,  
Sector and Intergovernmental Policy Branch  
99 Wellesley St W  
Toronto, ON  
M7A 1W3  
Canada  
Attn: [MiningActAmendments@ontario.ca](mailto:MiningActAmendments@ontario.ca)

May 15, 2025

Via email

**RE: (ERO 025-0409) Proposed amendments to the *Mining Act 1990*,  
*Electricity Act 1998*, and *Ontario Energy Board Act 1998*, to protect  
Ontario's Economy and Build a More Prosperous Ontario.**

This submission is made by the Association of Power Producers of Ontario (APPRO) in response to a request for comments posted on the Environmental Registry of Ontario website on April 17, 2025, in relation to the above-referenced topic.

APPRO appreciates the opportunity to provide such feedback.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Colin Anderson', written in a cursive style.

Colin Anderson  
President and CEO, APPRO

cc. APPRO Board of Directors

**(ERO 025-0409) Proposed amendments to the *Mining Act 1990, Electricity Act 1998, and Ontario Energy Board Act 1998, to protect Ontario's Economy and Build a More Prosperous Ontario.***

**Submission of the Association of Power Producers of Ontario (APPrO)**

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**INTRODUCTION**

APPrO represents generators operating in the province of Ontario, and a variety of organizations and individuals concerned with generation. APPrO members include developers, suppliers and consultants to power enterprises, both public and private, with an emphasis on implementing responsible and sustainable energy systems in Canada and around the world.

The Ministry of Energy and Mines is seeking input to inform potential changes to the *Mining Act, 1990*, the *Ontario Energy Board Act, 1998*, and the *Electricity Act, 1998* regarding proposed changes to streamline the permitting process for designated mining projects and to limit foreign participation in the energy sector. This submission is in response to that request for public comments, as posted on the Environmental Registry of Ontario website.

APPrO's members are committed to a reliable, affordable and sustainable energy supply in the province of Ontario, which is why APPrO has an interest in this matter.

APPrO appreciates the opportunity to provide feedback. APPrO will provide the vast majority of its input on the proposed changes associated with the *Ontario Energy Board Act, 1998*, and the *Electricity Act, 1998*.

## DETAILED COMMENTS

### 1. *Mining Act, 1990*

While APPrO does not intend to comment on matters of the mining industry, its legislation or on changes to any of its processes, APPrO does wish to register support in the general sense for the Ministry's rationalization of onerous permitting processes.

APPrO applauds the Ministry for taking this step and hopes that additional steps will be taken, going forward, that will rationalize other onerous and duplicative permitting and approval processes, specifically within the context of securing additional electricity generation resources for Ontario and expediting energy development as the province's demand for energy grows.

### 2. *The Ontario Energy Board Act, 1998, and the Electricity Act, 1998*

Energy security has always been important. Events of the recent past have demonstrated that it is even more important now.

Conflict in Europe has made clear how critical energy supply security is. In a remarkably short period of time, the war in Ukraine demonstrated that existing supply chains - supply chains that in the past were assumed to be rock-solid - were rendered unusable. It became necessary to locate, and negotiate for, alternate sources of energy to fuel the needs of the European continent due to Russian aggression. It is understandable that a similar view can be taken of critical goods and services within the electricity sector originating from other similar state entities, such as China.

Against this backdrop of global concern, APPrO asserts that Ontario's power producers are willing and capable of providing the required support in this area

and will rise to the challenge. APPrO supports actions that will assist in the build-out of electricity generation assets in the province to meet consumer demand and contribute to prosperous communities.

APPrO hopes that some agility can be designed into the application of this increased security so as to not unduly limit our ability to secure resources or equipment, meet demand, satisfy consumer need and grow Ontario's economy as we go forward in this new vigilant state. For clarity, in APPrO's view, the first window of the IESO's current LT2 procurement should not be impacted by these restrictions. As a procurement action that had already been initiated, and due to the significant impact such restrictions would have on project costs and schedules, APPrO respectfully advances that the existing LT2 process and objectives would best be served in the absence of these changes.

Ontario will need the ability to quickly impose such restrictions - or quickly remove them - depending on circumstances. That flexibility will need to consider many criteria (including schedules, costs, global relationships and a host of other things that will undoubtedly be unique in each set of circumstances). Similarly, the scope and severity of such imposed provisions will also require some flexibility in order to adapt to changing circumstances and critical needs. Government will need to carefully craft appropriate language to firmly meet this balanced need, while still providing clarity to those seeking to invest in the province. As it relates to the energy industry, this balanced approach must contemplate Ontario's urgent need for more generation and the global supply chain that generators depend upon for expedited development and equipment like turbines, battery energy storage systems, and transformers.

APPrO appreciates the opportunity to provide this input. We look forward to continuing to work together with the Ministry on energy related subjects.