

October 3, 2025

Jeffrey Ong, Director
Deputy Minister's Office
Ministry of Energy and Mines
10th Floor, 77 Grenville St.
Toronto, ON M7A 2C1

Submitted via the Environmental Registry of Ontario and emailed to jeffrey.ong2@ontario.ca

Dear Jeffery Ong,

Re: ERO-025-0993 Proposed Amendments to the *Electricity Act, Ontario Energy Board Act, and Municipal Franchises Act*, to support the Integrated Energy Plan

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses. OFA appreciates this opportunity to comment on proposed amendments to support the Integrated Energy Plan.

We support a mechanism to evaluate electricity connection requests of large electricity demand customers, such as data centres, to safeguard the distribution and bulk system planning needed to meet electrification buildout through 2050.

Modern farm operations have increased their energy demand for climate control, robotic equipment, heating, and ventilation. OFA supports proposed amendments meant to expedite grid buildout needed to drive innovation and economic growth. This includes using provisions within the Municipal Franchises Act that allow the Ontario Energy Board (OEB) to waive the requirement for municipal electors' assent if the OEB, after holding a hearing, is satisfied that it is not necessary. This is highlighted by the significant generation and transmission infrastructure occurring in southwest Ontario needed to help expand Ontario greenhouse production.

OFA appreciates the efforts of the Ministry in protecting prime agricultural areas. Many operations incorporate on-farm energy production to help meet their demand. **OFA recommends the Ministry consider agriculturally integrated projects for Long-Term procurements. Projects that are integral to the farm operation and which generate excess energy, should be eligible to participate in Independent Electricity System Operator (IESO) procurements on an equal footing with projects that avoid prime agricultural areas.**



Examples of agriculturally integrated projects include greenhouses that use Combined Heat and Power (CHP) to produce CO₂ for plant production, and livestock operations that use anaerobic digestion (AD) to convert manure into biogas and produce a digestate for land applications. The CHP and AD equipment are integral to the operations, do not reduce the amount of productive land at the operation, and **OFA recommends excess energy they produce be considered to have met the avoidance of prime agricultural areas rating criteria the IESO uses to rank energy and capacity procurements.**

Over 2,000 FIT (feed-in-tariff) contracts are due to expire through 2035. Most generate more electricity than can be consumed by the contract holder once their contract expires. Considering these grid connections and renewable energy assets are in place, and that the existing virtual net metering option will not offset the potential amount of available generation, **OFA recommends the Ministry of Energy work identify willing host communities, and work with the IESO and utilities to further review the merits of repricing and renewing contracts or allowing expired contract owners to negotiate third party power purchase agreements.**

There are 30,000 micro-FIT contracts set to expire between 2030 and 2037. While many micro-FIT customers will be able to continue to generate electricity to reduce utility usage, many others have the potential to contribute to reducing local utility demand constraints. **OFA recommends the Ministry support a review to assess the value of repurposing micro-FIT resources.**

Related to proposed amendments to the *Electricity Act* to facilitate the development of a hydrogen market and economy, while hydrogen can play a large role in an agnostic energy portfolio, **OFA recommends focus be directed towards the production of green hydrogen using excess base generation during periods of low electricity demand, prior to the production of blue hydrogen using methane with carbon capture and storage.**

In closing, OFA supports efforts of the Ministry to deliver secure and affordable energy. We look forward to working with the Ministry, the IESO, and the OEB, to ensure the agri-food sector has the energy needed to supply food, fibre, and energy locally, throughout Canada and the world.

Sincerely,

Drew Spoelstra
President

cc: Hon. Stephen Lecce, Minister of Energy, MinisterEnergy@ontario.ca
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.