

ERO 019-9284– Proposed Amendments to the Electricity Act, 1998, Ontario Energy Board Act, 1998 and the Energy Consumer Protection Act, 2010 to enable an affordable energy future

The following table contains consolidated comments prepared by staff in the Planning, Economic Development and Climate Change Initiatives Divisions of the Planning and Economic Development Department as well as the Energy Initiatives section of the Public Works Department.

ERO 019-9284 Sections	
Question	Comments
<p>Integrated Energy Resource Planning Amendments</p> <p>The ministry is seeking feedback on proposed amendments to the Electricity Act, 1998, which would enable an integrated energy resource planning process by:</p> <ol style="list-style-type: none"> 1. Ensuring energy planning is integrated and considers all forms of energy including electricity, natural gas, hydrogen and other energy resources, as well as energy efficiency, storage and demand management. 2. Changing the name of the plan from “Long-Term Energy Plan” to an “Integrated Energy Resource Plan” to reflect a planning process that is more integrated. 3. Updating the goals and objectives of the Integrated Energy Resource Planning process to align with the priorities of an evolving energy sector in the province. 4. Creating a predictable planning cycle for investors, stakeholders and Indigenous communities by requiring integrated planning consultations to begin at least once every five years from the issuance of the last plan. 5. Establishing regulation-making authority to define the specific technical information, documents or reports that 	<p>The Plan should limit its focus on energy/fuel networks that rely on fossil fuels (such as natural gas). Large corporations and manufacturers are increasingly locating their operations in jurisdictions where they can best achieve their corporate sustainability priorities. Ontario's current reliance on nuclear, hydroelectric, and wind/solar means that electricity usage in a new development can support corporate sustainability priorities without significant additional investment to operations because of how the province's electricity is generated. This should be prioritized when considering future electricity generation options as it is believed that how the province generates its power will increasingly become a significant factor in business location considerations.</p> <p>The ability for the province to provide an implementation directive that could bypass the IESO and OEB should only be provided where the implementation directive does not include providing capacity or servicing to an area that has</p>

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<p>would need to be considered in the development of future Integrated Energy Resource Plans.</p> <p>6. Enhancing agency implementation processes by removing the requirement for the Independent Electricity System Operator (IESO) and Ontario Energy Board (OEB) to submit implementation plans to the Minister if they receive an implementation directive. While directives could still require implementation plans or other agency reports, this amendment would provide flexibility to enable government to move quickly on issues that would not benefit from additional planning and report-back steps.</p>	<p>not been identified as an area for growth or within an urban boundary as identified through a municipal Official Plan to ensure orderly prioritization of investment and limit unexpected costs to taxpayers.</p> <p>The city promotes and encourages transparency in energy planning and encourages that where implementations plans are not required by Independent Electricity System Operator (IESO) and Ontario Energy Board (OEB) that clear information be made publicly accessible informing the public of the goals/objectives of each individual specific implementation direction and how it is proposed to be achieved.</p>
<p>Electricity Connections to Support Growth</p> <p>The ministry is seeking feedback on proposed amendments to the Ontario Energy Board Act, 1998 to enable more timely and cost-effective electricity grid expansions to support high growth areas. The proposed amendments would give Government regulation-making authority to change how costs are allocated and recovered for transmission and distribution connection infrastructure where the prospect of load materializing in the future is very likely.</p> <p>If this legislation is passed, the ministry would propose regulations that could allow for allocating costs for certain electricity system connection infrastructure, particularly in</p>	<p>Costs for servicing developments occurring outside of current in effect urban boundaries and anticipated growth areas should continue to be borne by the developer/property owner entirely. Costs should only be shared where additional infrastructure is required to enable growth occurring in anticipated and planned growth areas in accordance with municipal Official Plans to ensure that orderly development continues.</p>

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<p>high-growth areas. Regulation(s) could include provisions that reduce the cost and financial burden on 'first mover' customers and enable more timely development of connection infrastructure to enhance system readiness for industrial and housing development and electrification. The design and implementation of the regulation(s), including the types of projects that would be subject to new cost-allocation and the controls to ensure that costs are allocated fairly, will be determined through a separate consultation process.</p>	
<p>Exemptions for Electric Vehicle (EV) Charging Companies and Flexible Billing</p> <p>The ministry is seeking feedback on proposed amendments to the Ontario Energy Board Act, 1998, the Electricity Act, 1998, and the Energy Consumer Protection Act, 2010 (the Acts) to support the growth of EV adoption in Ontario.</p> <p>These proposed amendments would state that the Acts do not apply with respect to the distribution or retail of electricity for electric vehicle charging. This would confirm that EV charging companies are exempt from regulation under these Acts for their EV charging activities, such as licensing, rate setting and reporting. Regulation of these activities would impose administrative burdens and barriers to entry, and unnecessarily limit billing options that EV chargers can</p>	<p>The City of Hamilton recently approved new zoning regulations for electric vehicles including the requirement for rough-ins for charging infrastructure. The government could consider province-wide standards and regulations respecting electrical vehicles to ensure grid capacity exists for electric vehicles in addition to heating/cooling systems that will require electricity.</p> <p>The province should recognize the full spectrum of transitions that are already underway and being supported by municipal governments.</p>

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<p>employ (e.g., billing based on volume of electricity used for charge).</p> <p>The ministry is also proposing to establish regulation-making authority to enable government to apply certain electricity retailing and distribution requirements in the Acts to EV charging, should there be a need to introduce such requirements in the future.</p>	
<p>Programs to Increase Energy Affordability</p> <p>Ontario currently offers a suite of electricity energy efficiency (EE) programs that are funded through electricity rates to address electricity system needs and help customers reduce their electricity consumption and bills. Current legislation limits the Independent Electricity System Operator (IESO) to only administer EE programs that result in electricity savings. The ministry is seeking feedback on proposed amendments to the Electricity Act, 1998 that would enable the IESO to administer enhanced energy efficiency programs that support beneficial electrification (BE) - the use of electricity instead of other fuels to reduce overall energy use and subsequently reduce costs for high consumption activities such as home heating and cooling, regardless of fuel-type (i.e., propane, oil, wood).</p> <p>If the proposed legislative amendments are passed, this programming could be funded through electricity rates to</p>	<p>The City of Hamilton has approved a ReCharge Hamilton - A Community Energy and Emissions Plan. A long-term plan to meet Hamilton’s future energy needs while improving energy efficiency, reducing greenhouse gas (GHG) emissions, and fostering local sustainable and community-supported energy solutions. The plan includes every aspect of city-wide energy use and GHG emissions, from homes to transportation to industry to waste. New incentives that encourage replacement of direct fossil fuel use to electricity generated from renewable sources (e.g. Hydroelectric) aligns with the Goals of this Plan.</p> <p>Incentive programs should focus on sustainable private on-site electricity generation to reduce a development’s demand on the grid either partly or entirely. Priority should be given to sustainable on-site power generation that can be incorporated into a development with limited modifications such as solar panels on large industrial/commercial rooftops. Programs should also consider ancillary</p>

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<p>provide direct assistance to customers to help reduce energy costs and participate in electrification.</p> <p>Proposed amendments would also include adding additional purposes of the Act and objects of the IESO in connection with BE programs.</p>	<p>costs needed to facilitate on-site electricity generation such as, in the case of solar panels, costs to retrofit a building’s structure to handle the added weight of solar panels on a roof.</p>
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