

ERO 019-9285 - Integrated Energy Resource Plan Consultation

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 019-9285 Guiding Questions	
Topic: Overarching Question	
Question	Comments
<p>What policy options and actions should the government consider in the integrated energy resource plan to achieve Ontario’s vision for meeting growing energy needs, keeping energy affordable and reliable, ensuring customer choice, and positioning us to be an energy superpower?</p>	<p>The province should not pursue more affordable electricity generation options (or expand availability of networks reliant on fossil fuels such as natural gas) at the expense of generating electricity sustainably. Large corporations and manufacturers are increasingly locating their operations in jurisdictions where they can best achieve their corporate sustainability priorities. Ontario's 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>Regulatory supports and/or financial incentives should be considered to support business and residents in generating all or part of their electrical needs on their own property. Collectively this could reduce the overall hydro demand needed to be serviced by large-scale, expansive, and time-intensive hydro generation projects.</p> <p>Additionally, energy conservation should be prioritized wherever possible to avoid the infrastructure costs associated with providing more energy for a growing population.</p>

	<p>The province needs to consider climate emergency and municipal level climate planning in this planning process. This requires prioritizing energy conservation, renewable energy generation and storage, geothermal / waste heat, etc.; and, ensuring that Ontario’s electricity grid is ultimately as low carbon as possible. Currently the electricity grid is increasing in carbon intensity because of growing dependence on methane gas power plants feeding energy into grid. The province should fast track plans to shift to be a ‘sustainable, low carbon’ energy superpower.</p> <p>The province’s concept of becoming an energy superpower is very focused on nuclear power and on exporting energy and technology. The priority needs to be placed on getting Ontario’s energy needs addressed in a sustainable, low carbon manner to ensure we are planning for climate resilience through conservation, renewables, elimination of fossil fuels from the system, and leveraging economic development through decarbonization in the process (including through economic benefits of retrofits, renewable energy system building, and through decarbonization of industry and business in order to keep private sector players competitive in the global market).</p>
<p>Topic: Planning for Growth</p>	
<p>Building on the recommendations of the Electrification and Energy Transition Panel’s (EETP) final report, what actions should be prioritized to enhance planning across natural gas, electricity, and other fuels?</p>	<p>The Province of Ontario should support the EETP’s call for Comprehensive Local Energy Plans and provide support to municipalities and local partners in the development and implementation of these plans (see EETP recommendation no. 7).</p> <p>Provincial support for municipal-level energy plans should recognize the close connection between energy planning and municipal-level climate action planning.</p> <p>A gap identified in the assessment of IESO’s Pathways to Decarbonization Study prepared by the Sustainability Solutions Group is the</p>

	<p>inability “to assess the dynamic relationship between demand and supply that is intrinsic to advancing a cost effective decarbonization effort that reduces demand as much as economically possible and then meets demand as locally as possible to reduce expense on central generation and transmission”.</p>
<p>The government’s priority is to ensure Ontario has the energy resources it needs to support growth. Are there opportunities to enhance the province’s approach to procuring electricity generation supply to better serve this priority?</p>	<p>The City of Hamilton is aware of several development proposals that cannot proceed to construction because there is a lack of available power. The city suggests the province assess these existing ‘pinch points’ as part of its proposed approach to meeting current and future electrical needs.</p> <p>The province should prioritize facilitating decarbonization which relates to economic growth. Existing industries and businesses are looking for access to green electricity and other low carbon forms of energy which is critical to enable them to effectively compete in global markets.</p> <p>This city is interested in how the provincial government is prioritizing these needs/demands on the system and whether these are considered to be a component of the ‘growth’ (in demand) being referred to?</p> <p>More support for renewable energy generation and associated storage, near where the demand for power exists, is needed. At the same time, these systems must be safe and more province-wide direction on requirements to ensure safe operations of battery energy storage facilities would be welcome direction at the local level.</p>
<p>What actions should government consider to promote greater access to electricity and accelerate grid-connections that will support economic growth, connecting new homes, and electrifying transportation and heating?</p>	<p>The province should heed the Ontario Energy Board (OEB) decision in December 2023 respecting methane gas hookup costs and the reduction of amortization periods from 40 years to 0 years (or a timeframe in between as recommended by EETP) to avoid ‘stranded</p>

	<p>assets’ into the future as transition away from methane gas continues to unfold.</p>
<p>As the need for new transmission infrastructure continues to grow, what steps can government take to ensure that transmitters have the certainty they require to move forward with development work as soon as possible, while also ensuring that competitive pressures keep costs as low as possible?</p>	<p>Identify and protect future infrastructure growth corridors, (similar to, but better than, the Parkway Belt West Plan), in alignment with the province's planning and growth projection horizons. Priority should be given to corridors leading from current/future electricity generation sources to existing and future growth areas (while also reflecting and reinforcing existing municipal urban boundaries) to ensure that as urban areas continue their build out that these areas can be adequately serviced by infrastructure via protected corridors that can be drawn upon and utilized as demand increases.</p> <p>Additionally, prioritizing energy efficiency and energy conservation combined with supporting local energy planning and innovation as opportunities to reduce demands on the grid will subsequently reduce demands for new infrastructure.</p>
<p>What policy guidance should the government provide to the Ontario Energy Board with respect to the long-term role of natural gas in Ontario’s economy and opportunities for low-carbon alternatives in the gas system?</p>	<p>The province should ensure the upfront cost of new natural gas connections properly reflects the risks associated with stranded assets in line with goals to achieve net-zero by 2050.</p> <p>Additionally, the province should consider regulatory direction regarding treatment of customer renewable natural gas or natural gas credit purchases on natural gas utility bills. Consider direction for using infrastructure that is currently natural gas or renewable natural gas for future Hydrogen usage, taking advantage of the same pipeline infrastructure. New infrastructure that is currently NG/RNG should be considered for future Hydrogen usage.</p>
<p>How can the government best support Indigenous leadership and participation in energy planning and projects?</p>	<p>The government should facilitate empowerment of Indigenous Communities where there are concerns with energy generation for their own use and / or as commercial enterprise. The</p>

	<p>province should consider the recommendations of EETP where Indigenous communities and leadership are concerned.</p>
<p>How can provincial planning processes be enhanced to support high growth regions, ensure greater coordination between energy resources, and better integrate municipal, distributor and regional planning processes?</p>	<p>The province should identify future infrastructure corridors and provide protections from development or infringement through associated policies in the Provincial Planning Statement.</p> <p>With respect to new electrical generation or storage, provide guidance on appropriate development regulations respecting the location and design of these facilities taking into consideration the protection of human health, species habitat, natural areas, and the preservation of prime agricultural lands. This guidance will assist municipalities like Hamilton when updating its Official Plans to recognize and accommodate growing electrical demands.</p> <p>Based on the recommendations of Pathways to Decarbonization (IESO, 2022), more agility and flexibility is needed between the province, OEB and IESO. Provincial entities and local actors need to ensure that needs can be readily and effectively supported including addressing municipal visions for climate mitigation and adaptation. An agile approach that supports and encourages a range of approaches including non-wire solutions is needed.</p>
<p>What cooperation opportunities exist across other jurisdictions to support energy trade, construction of transmission infrastructure (ex. pipelines and interties), and transportation electrification?</p>	<p>Cross-jurisdiction importation of power should only be undertaken where agreements are established respecting the sustainable nature of the energy being produced in the other jurisdictions. This is important to ensuring that when a business locates in Ontario in support of its corporate environmental, social and governance priorities, that they have assurance that the means of generating electricity through the grid remains sustainable.</p> <p>The province may explore and / or pursue opportunities to purchase surplus hydroelectric</p>

	power from adjacent jurisdictions including Quebec and Manitoba.
What types of technical information and forecasts would best support sector participants and energy consumers as the system is built out for growth and the economy increasingly electrifies?	Forecasts for municipal level implementation of climate action strategies related to energy consumption and energy demands on the grid for both anticipated reductions and anticipated increases in demand is needed.
Affordable and Reliable Energy	
What further steps should the government take to enable households and businesses to manage and make informed decisions about their energy use?	Based on a goal of prioritizing the reduction in energy consumption by increasing energy efficiency, the government should provide opportunities and incentives for households and businesses to undertake deep energy retrofits.
What actions could the government consider to ensure the electricity system supports customers who choose to switch to an electric vehicle?	<p>The City of Hamilton recently approved new parking regulations which require rough-ins for charging infrastructure for electric vehicles in new development. 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>
What actions should government consider that would empower customers to install innovative technologies to generate or store energy on-site to reduce costs and improve resiliency?	The government should consider attractive incentivization of these technologies, especially where these options will help to reduce demand on the grid.
What specific actions could position the integrated energy resource plan to best leverage distributed energy resources (DER) that enhance local and province wide grids to support energy system needs reliably and at the lowest cost?	Providing support for Comprehensive Local Energy Plans that will, in turn, guide the leveraging of DER resources.

<p>What policy or regulatory changes should government consider to address financial risks and support adoption of DER in the long-term?</p>	<p>Pathways to Decarbonization (IESO, 2022) provides a fulsome analysis about how financial risks can be addressed including sizing the centralized electricity system right and, in doing so, avoiding stranded assets moving forward, etc.).</p>
<p>With the energy sector evolving and distributors considering new roles in serving customers, what barriers exist that limit local distribution companies from taking on new duties that could enable more efficient grid operations, leverage new technologies and further the integration of DERs?</p>	<p>Lack of coordination at the municipal level is an existing barrier limiting local distribution companies from taking on new duties. There is a need for local-level roundtables to bring all relevant players together to discuss Comprehensive Local Energy Plans/Planning to help identify collective limitations.</p>
<p>What actions can the government take to enhance collaboration between the OEB, the IESO, local distribution companies, industry stakeholders, and local communities to support the investment and integration of DER?</p>	<p>The Ontario government should consult with different entities already looking at ways to innovate the local energy systems. They can share valuable experience on the challenges and barriers to utilizing different approaches.</p>
<p>What further actions could the government take to maintain an affordable energy system for Ontarians throughout the energy transition?</p>	<p>Ontario should support deep energy retrofit programs for residential, commercial, institutional, and industrial buildings. Enabling accelerated retrofits of existing buildings will result in reductions in energy consumption and the associated ongoing costs while also reducing energy demands.</p>
Topic: Becoming an Energy Superpower	
<p>Framing Ontario as an ‘Energy Superpower’ implies it will create a large amount of energy. It is better to emphasize Ontario as being a ‘clean energy leader’ that utilizes energy wisely and efficiently.</p>	
<p>What opportunities exist to further capitalize on Ontario’s leadership and expertise in nuclear technology and nuclear innovation?</p>	<p>No comment.</p>

<p>What opportunities should Ontario consider to leverage its position as a clean energy leader?</p>	<p>Ontario should look for opportunities to support a more agile, flexible energy network that is designed to encourage and support more decentralized power generation systems – including renewable (solar, wind) and associated energy storage systems, and other systems including geothermal, district energy (including systems that tap into and utilize waste heat), etc.</p>
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