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Draft OEB Guidelines for Expansion of Natural Gas
EB-2019-0255
Comments on behalf of Pollution Probe

In a letter from the Minister of Energy, Northern Development and Mines (ENDM), the Minister asked the Ontario Energy Board (OEB) to examine and report back to ENDM by August 31, 2020 with information on potential projects to expand access to natural gas distribution to communities that are not currently connected to a natural gas distribution system.

The government intends to make available \$130 million in rate-payer funds to financially support new projects currently not viable under traditional OEB expansion criteria, and that can reasonably be expected to commence construction between 2021 and 2023.

The OEB has now issued a letter inviting stakeholder participation to comment on Draft Guidelines for Potential Projects to Expand Access to Natural Gas Distribution (Draft Guidelines).

With this letter, the Ontario Federation of Agriculture (OFA) provides comments related to the Draft Guidelines and we believe the interests of our members directly relates to the scope of the Draft Guidelines.

OFA is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA supports affordable rural and rural community energy solutions to help address carbon emission reductions, reliable safe energy choices, energy independence and energy efficiencies. Access to natural gas is integral to ensuring rural economic development, sustained job creation, improved standard of living and clean transportation solutions for rural and northern communities.

Expanding natural gas infrastructure to otherwise non-viable regions should compliment local distributed energy resources and community energy planning. To achieve Ministry of Energy policy aims, analysis and decision making must consider regional and local agricultural and commercial energy consumption profiles, must consider carbon sequestration impacts, and must consider local community energy plans; necessary to inform smart expansion decisions.

Long-term smart expansion will serve Ontarians far better than simply looking at the lowest hanging fruit – smart expansion is more than connecting the most homes per dollar of funding support. Determining which proposals to approve should be based on uniform data criteria and address capacity constraints and future phases for Access to Natural Gas Act expansion. Instead of risking infrastructure becoming under-sized to deliver future projects, approved design proposals should enable *more* future proposals.



Related to the OEB request for stakeholders to comment on the requirement that a proponent be the Certificate holder unless the Certificate holder does not propose a project for the area. The Ontario Federation of Agriculture supports a process where government decisionmakers can review every proposal regardless of the status to Certificate holder. Ensuring a Certificate holder is kept whole regarding commonality is enough to allow the best possible project to move forward.

Thank you for the opportunity to comment on the proposed guidelines for phase two access to natural gas expansion. Please consider contacting our office for any clarification or further information.

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