

August 14, 2020

Matthew Edwards  
Conservation and Energy Efficiency Branch  
Energy, Northern Development and Mines  
77 Grenville Street, 5th floor  
Toronto, ON M7A 2C1

Via Environmental Registry of Ontario Web Portal

Dear Mr. Edwards,

**Re: EBR-019-2048 and 20-ENDM-17 - Proposed implementation of Choice for Regulated Price Plan and Time-of-Use Customers**

The Ontario Federation of Agriculture (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.

Most Ontario farms based their business model on tiered electricity rates. As TOU pricing expanded into rural areas, many businesses were switched to TOU rates with disregard that it impeded their operations. Although Ontario's farm businesses are persistent adopters of conservation and demand management, many do not have the capacity to reduce electricity consumption during peak-use hours under TOU accounting. Heating, cooling, and ventilation is integral to maintain perishable crops and provide livestock with proper care. Farms cannot curtail these climate controls during high demand driven by a heat wave or acute cold weather events.

OFA strongly endorses a proposal to allow Ontario farm business electricity customers to benefit from having the option of switching from TOU rates to level of consumption-based rates to best suit their needs.

Considering the challenges faced by Ontario farm businesses, this proposal will allow some operations, with no means to conserve demand or reduce consumption based on time of day, the ability to have some control over their electricity costs.

Sincerely,



Keith Currie  
President

cc: OFA Board of Directors