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Subject: ERO 019-1134 re: amendments to regulations for combined heat and power systems that use natural gas or wood biomass as fuel

General Motors of Canada has reviewed the Ministry's posting regarding amendments to regulations impacting combined heat and power systems that use natural gas or wood biomass as fuel and are encouraged at the direction the Ministry is taking. We support initiatives that look to align approval requirements with consideration of their level of risk as well as streamlining the permission system to ensure a level playing field between technologies that result in better environmental outcomes such as lower overall emissions or better energy efficiency.

General Motors has recent experience with obtaining amended environmental compliance approvals (ECA) and an renewable energy approval (REA) for our recently commissioned cogeneration facility at our St Catharines Propulsion Plant which runs on renewable landfill gas and is reducing the facility's greenhouse gas emissions by almost 70%. Obtaining these approvals was resource intensive and costly and did not appropriately reflect the low risk of the project or recognize the significant environmental benefits of the project. In fact the REA was so cumbersome that it could impact our decision going forward to engage in any similar project rather than just developing traditional combined heat and power system running on natural gas.

For these reasons we believe this proposal should be broader and consider other sources of renewable fuels other than wood biomass. Small projects (less than 25 MW) burning renewable landfill gas should be exempt from REAs while their air contaminant emissions and noise should be assessed either through an EASR or ECA. REA for renewable landfill gas projects are limited to considerations regarding the combined heat and power system or engines and already excludes pipeline issues which follow a different regulatory process. Therefore the scope of the REA and the regulatory burden seem disproportionate to the overall level of risk and at worse a disincentive to technology adoption imperative to reduce greenhouse gas emission as assist in meeting climate change goals.

We appreciate the opportunity to review this proposal. Should you have any questions or would like to discuss in more detail please feel free to reach me at the coordinates below.

Sincerely,

11/25/2020

X *Tammy Giroux*

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Tammy Giroux  
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Signed by: MZ9FFD