

March 26, 2021

Emma Heffernan  
Ministry of Energy, Northern Development and Mines  
Distribution and Consumer Assistance Policy Branch  
77 Grenville Street, 6th Floor  
Toronto, ON  
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Sent via email to: [emma.heffernan@ontario.ca](mailto:emma.heffernan@ontario.ca)  
and submitted online through the Environmental Registry of Ontario

Dear Ms. Heffernan,

**RE: 019-3191 Phase 2 of the Natural Gas Expansion Program**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

Thank you for the opportunity to highlight concerns and opportunities surrounding the Natural Gas Expansion Program (Phase 2). From local to international, the demands placed on farms to provide food, fibre and renewable fuel, requires reliable energy sources. Farmers need access to natural gas and compressed natural gas options.

Natural gas expansion to farming and rural communities should be a top priority for infrastructure investment. OFA supports a multi-year expansion plan for rural energy infrastructure. The investments in funding support for expansion projects realize immediate, continued direct and indirect economic benefits.

The use of reliable sources of natural gas and the critical need for sources of lower carbon emitting fuels are not mutually exclusive. Attaining carbon sequestration targets means transitioning from fossil to renewable fuels. During the transition, and to make renewable fuel crop production viable,

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requires compressed and natural gas, as lower-carbon-intense alternatives to propane and diesel fuel. OFA believes hydrogen and RNG injection strategies will ensure new and existing natural gas assets are not stranded.

Farming and food processing provide a ready, sustainable source of RNG feedstock for rural Ontario to produce clean renewable fuels. RNG will help fuel our transportation and heat our homes and farms.

OFA recommends the Ministry of Energy join OFA, OMAFRA, Enbridge, and Agriculture and Agri-Food Canada (AAFC), by supporting agricultural community farm cluster model research currently underway, led by the Canadian Biogas Association. These clusters would produce biogas and refine to RNG for injection into the natural gas distribution network throughout Ontario. This model will also enable closer pipeline access for currently non-viable community expansion projects and increase the likelihood for many rural communities to receive natural gas.

The overwhelming interest in natural gas expansion from First Nations and rural communities in Phase 2 of the program reflects the importance of natural gas to rural Ontarians.

Rural farms are partners with small communities. Combining residential natural gas expansion proposals with outlying farm businesses can increase feasibility for many expansion projects and enable otherwise non-viable projects.

OFA recommends the government consider additional criteria to inform the selection for applications for funding consideration. The challenge for government is not determining the most viable projects, but in combining that criteria with a multi-year vision, looking at strategic projects that in turn, enable more projects, and by encouraging strategic partnerships with farm communities and rural businesses, to increase natural gas connection opportunities for rural and regional Ontario.

OFA will continue to work towards increasing natural gas expansion opportunities in rural Ontario. We support indigenous and rural communities, farms and farm businesses, utilities and government in this effort. We look forward to continuing to provide an agricultural perspective throughout the various phases of the Natural Gas Expansion Program and during consultations with respect to other regulations proposed by the provincial government.

Sincerely,



Peggy Brekveld  
President

BP/in

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CC The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
The Honourable Greg Rickford, Minister of Energy, Northern Development and Mines  
Jennifer Green, Executive Director, Canadian Biogas Association  
OFA Board of Directors

