



Ontario Greenhouse Vegetable Growers
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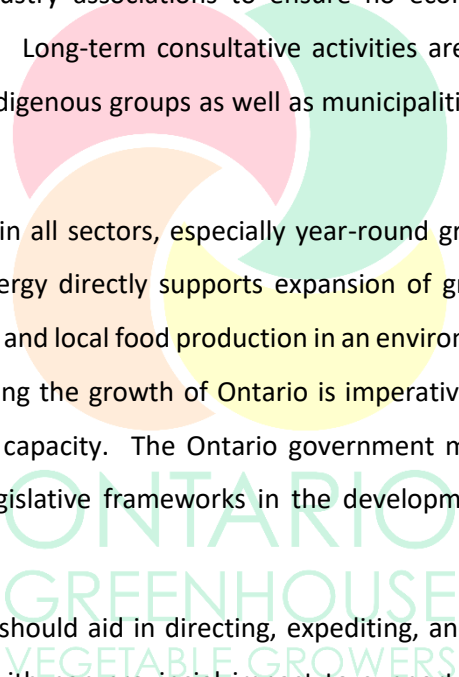
Rachel Thompson
Ministry of Energy, Northern Development and Mines,
Strategic Network and Agency Policy Division
77 Grenville Street, 6th Floor
Toronto, ON, M7A 2C1
Sent via email to: Rachel.thompson3@ontario.ca
and submitted online through the Environmental Registry of Ontario

Dear Ms. Thompson,

Re: ERO # 019-3007 - Ontario Long-Term Energy Planning Framework Review

The Ontario Greenhouse Vegetable Growers (OGVG) are pleased to provide comments on *Reforming the Long-Term Energy (LTE) Planning Framework in Ontario*. The OGVG represents approximately 200 farmers responsible for over 3,200 acres of greenhouse tomatoes, peppers and cucumbers across the province. With farmgate sales in excess of \$1 billion in both 2019 and 2020, a contribution of \$1.8 billion to the economy and a consistent track record of growth, the sector is a valuable economic driver for the province. The OGVG's membership is reliant on accessible, abundant, efficient and cost-effective energy to support fresh, high quality food grown year-round to assist in meeting healthy eating and food security goals across the province.

We are pleased to provide comments on the LTEP framework review from a Greenhouse perspective, a sector with unique energy demand profiles. Greenhouses have high demand for a combination of electricity, natural gas and propane. While we continue to incorporate renewable energy options as they arise, agriculture is a rural industry challenged by capacity constraints in the regions of Niagara and southwest Ontario, and challenged by energy security and reliability issues throughout the province. This being noted, we are an industry that readily incorporates energy efficiency and conservation platforms as they become available.

The logo for Ontario Greenhouse Vegetable Growers is centered in the background. It features a circular emblem composed of four overlapping semi-circles in pink, green, orange, and yellow. Below the emblem, the text "ONTARIO GREENHOUSE VEGETABLE GROWERS" is written in a light green, sans-serif font, with "ONTARIO" on the top line, "GREENHOUSE" on the second line, and "VEGETABLE GROWERS" on the third line.

The OGVG membership consists of greenhouse facilities of various sizes and energy requirements. All members, both large and small, are directly impacted by the costs, supply and reliability of energy supplied by both transmission lines and hydrocarbon pipelines. Ontario's LTEP must include notifications, publications and ongoing consultations to and with stakeholders to promote transparency, accountability and effectiveness in energy planning. Broad, meaningful and ongoing consultations must exist with local municipalities, industry and industry associations to ensure no economically devastating gap exists between capacity and demand. Long-term consultative activities are essential to ensure meaningful participation to the benefit of indigenous groups as well as municipalities, conservation authorities, and private property owners at large.

Energy is at the core of growth in all sectors, especially year-round greenhouse vegetable production. Growth in the availability of energy directly supports expansion of greenhouse vegetable production which provides efficient, reliable, and local food production in an environmentally conscious manner. The expediency of projects and leading the growth of Ontario is imperative in the new LTEP framework to ensure demand never outstrips capacity. The Ontario government must be responsible for ensuring minimal delays occur due to legislative frameworks in the development of energy assets within the province.

When needed, the government should aid in directing, expediting, and approving the development of new large scale energy assets with pan-provincial impact to support economic growth. Large scale investments that are on the gigawatt scale, above 500 MW, should require legislative oversight or review by an expert committee to ensure value-for-money, appropriate oversight and economic validation for the public interest.

Ministry of Energy, Northern Development and Mines intends the LTEP framework to prioritize transparency in a more predictable and reliable decision-making process, with the expectation of increased investment certainty. We support this and the intention to enable the technical expertise of the Independent Electricity System Operator (IESO) and the Ontario Energy Board (OEB). While elevating these organizations requires reviews of the Electricity Act and their corresponding mandates, we encourage the Ministry to also review the capacity of IESO and OEB to ensure they have sufficient systems and processes in place to effectively oversee, evaluate and improve the performance of programs, planning and resource acquisitions.

The purpose of consulting at this stage in the LTEP framework review is to communicate the proposed objectives of refocusing the planning process and to invite stakeholders to share ideas and perspectives with the Ministry. The Ministry's ERO Proposal contains phrases such as electricity needs, electricity grid, electricity system, but does not reference the needs, systems or distribution of natural gas, a much larger energy supply demand in Ontario. While recent Energy Ministers prefer to be energy agnostic in decision-making, all energy sources merit improvements to transparency, accountability, and effective planning. By only focusing on electricity you risk losing the agnostic approach.

As the regulator, the mandate of the OEB should remain regulatory oversight with a focus on expediting reviews and licensing to support growth. Ensuring expediency in the rigorous review process ensures that demand does not outpace supply and hinder economic growth in the province. IESO must maintain forward-looking, practical and efficient system planning supported by competitive procurement and energy-efficiency programs in order to support growing provincial demand and ensure energy deficits don't drive acquisition of energy assets.

In many cases demand for energy efficiency programs outstrip availability as exemplified by the program to retrofit greenhouses with energy efficient LEDs. For example, Greenhouse operations in Southwestern Ontario are limited in their ability to expand acreage, as the severe oversubscription and lack of infrastructure planning impedes progress. The demand on the electricity grid is so extensive, that current planned developments by Hydro One and IESO will not even meet the energy needs.

The OGVG supports the identification of cleaner energy sources along with innovative and emerging technologies to ensuring resiliency to the effects of climate change. The OGVG recognizes that all energy projects must take into account an ongoing goal of reducing air emissions from the energy sector. The OGVG believes that solutions should include Cogeneration, or Combined Heat & Power (CHP) systems, as well as carbon capture and sequestration as is carried out in modern indoor agriculture. OGVG members lead the province by utilizing the heat and carbon dioxide produced from burning hydrocarbons to feed Ontarians. Support of closed loop system and the totality of the energy cycle must be taken into account within any LTE planning framework.

The OGVG's membership is reliant on reliable, abundant and cost-effective energy to support year-round growing under lights to provide year-round fresh produce. As technology becomes developed and processes optimized, the Greenhouse Industries capabilities of improving their ability for circular waste

utilization progresses. The ability to increase cogeneration and trigeneration capacity requires access to reliable energy, which could be sold to nearby towns, cities or Municipalities at high peak times.

Other areas actively investigated for improvement in energy consumption is the implementation of LED lighting as opposed to High Pressure Sodium (HPS), which can save up to 50% energy consumption and last up to 5x longer. Also, energy curtains which have shown to improve heat efficiency in the winter by up to 50%. In addition to these examples, further research and investment from the province is required to evaluate the feasibility of green hydrogen, or the recently announced Small Mobile Reactors (SMRs).

Enabling the use of a strategic vision to balance cost efficiency with calculated expansion will better deliver on Ontario's objectives – connect more people and businesses to fuels that are cleaner than existing fuels, providing the private sector with opportunities to become greener. This vision will enable foundational expansions which will in turn enable more-viable projects. This more strategic view would include easier access for municipal agriculturally based renewable natural gas pilots, in addition to pilots that also inject green hydrogen into the expanded pipeline infrastructure. We also support the Ministry enabling OEB to update natural gas conservation program framework.

The greenhouse sector is an early-stage adopter of innovative technology and is keen to lead in innovation that leads to lower carbon footprints and a more globally competitive and sustainable sector. Our greenhouses rely on the work of Ministry staff and policymakers to advance our energy systems, and the development and execution of programs by dedicated IESO and OEB staff. Thank you for providing this opportunity to present an agricultural perspective to the review process of long-term energy planning. I look forward to continued collaboration with the Ministry and Ontario energy authorities.

We thank you for the opportunity to provide feedback on this matter.

Sincerely,



Joe Sbrocchi
General Manager