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Ministry of Energy, Northern Development and  
Mines, Strategic Network and Agency Policy Division  
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April 27, 2021.

**RE: Long Term Energy Planning – ERO# 019-3007**

Dear Rachel Thompson,

I am writing to you on behalf of The Atmospheric Fund on Ontario's Long Term Energy Planning process. Energy production and consumption accounts for 76% of Ontario's carbon emissions, and these emissions have grown by over 6 Mt since 2017<sup>1</sup>. As indicated by TAF's most recent emissions inventory<sup>2</sup> there is a troubling trend towards increased use of natural gas for both heating and electricity generation. Ontario needs to reduce carbon emissions by approximately 19 Mt to reach its 2030 target, but energy emissions are trending in the wrong direction across all sub-sectors including buildings, transportation, and electricity generation. Moreover, the latest annual planning outlook from IESO forecasts that electricity generation emissions will increase by nearly 8 Mt by 2030 – putting Ontario's 2030 climate targets firmly out of reach<sup>3</sup>. Ontario's next Long Term Energy Plan (LTEP) must be designed to meet Ontario's climate targets. Given the interconnected nature of our building, transportation, and electricity emissions TAF strongly urges that all three of these areas be included in the next LTEP.

Our submission is divided into two parts. The first is our general recommendations for how the consultations on the next LTEP should be organized, the second section includes answers to key questions that were asked in the request for comment posted by the Ontario Government. Our recommendations are:

**A whole of sector approach.**

Ontario's electricity production, buildings, and transportation sectors are impossible to divide from one another. When consulting on the next LTEP we strongly encourage a broad examination of how Ontarians produce and consume energy in a holistic approach including all energy sources and end-uses.

**The LTEP must include carbon reduction and efficiency targets.**

Ontario has committed to reducing carbon emissions 30% by 2030 and has published a made-in-Ontario plan to get there that includes ambitious energy conservation targets. It is vital that the next LTEP be consistent with Ontario's climate commitments and plan and include energy sector specific carbon reduction and efficiency targets.

**A task force to develop the plan.**

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The process of designing the next LTEP is key and will require support and expertise from all corners of Ontario. As such we recommend that the next LTEP be led by a task force comprised of First Nations, municipalities, industry, environmental organizations, consultants, regulators, and other relevant parties. It is important that there be equal representation on this board for each of these sectors and that it should not be comprised primarily from only one or two sectors.

TAF recommends that the LTEP must include carbon targets as laid out by the Government of Ontario and approach the LTEP from a whole of sector approach. This means including municipalities, industry, environmental organizations, and other subject matter experts. It is important that Task Force members be compensated for their time and be properly supported by a Ministry secretariat.

This task force must also be supported to allow for the highest calibre of contributions. This should be done in a similar matter as done by the OEB with stakeholder contributions and expertise that is expensed under specific guidelines. This will allow for expert work to support the taskforce and for contributions to be professional in nature and save the task force time and resources.

### **Guiding Questions:**

*How can we promote transparency, accountability and effectiveness of energy planning and decision-making under a new planning framework?*

TAF recommends the use of a task force to oversee the design and implementation of the next LTEP. This task force needs to be drawn from the many different stakeholders relevant in this process to ensure diverse opinions are heard equitably. We echo the CAC recommendation that regulators, ministries, municipalities, First Nations, academics, industry, NGOs and voices from low-income communities need to be included.

*Are there gaps in the IESO and the OEB's mandates and objectives that limit their ability to effectively lead long-term planning?*

The IESO and OEB's mandates do not include climate change mitigation, nor instructions to meet provincial climate targets. This limits their ability to lead long-term energy planning, because energy planning needs to be aligned with climate planning and targets. This needs to be rectified for the coming LTEP as governments from all levels have made commitments to lower our carbon emissions, increase efficiency, and move towards electrified modes of transportation. The next LTEP cannot be made in a silo ignoring these realities, nor can it plan for a future energy system that is incompatible with provincial climate targets. The Government must broaden the IESO and OEB's mandates to address climate change, and/or clearly direct them to include provincial climate targets in their planning and actions.

*Should certain planning processes or decisions by the IESO, the OEB, or the government receive additional scrutiny, for example through legislative oversight or review by an expert committee?*

It is important for this LTEP to have goals and objectives and then for a report to be done on what objectives were accomplished at the end of it, and to clearly state why, if any, changes are made to the LTEP and what those results were. LTEPs should provide focus and action, if changes are necessary, it is vital to understand why those changes were made for transparency and accountability. Moreover, the LTEP should provide an incremental road map to change with regular reports back to the Minister and by the Auditor General for public review and analysis. Incremental check in dates can be determined by the Task Force as they see fit depending on the sector and the working being done.

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*How often and in what form should government provide policy guidance and direction to facilitate effective long-term energy planning?*

As stated above the Government should provide metrics for carbon reduction, energy efficiency, and instruct a whole of government approach to achieve stated goals and objectives. The LTEP should be more than a guiding document for government organizations. The LTEP should be renewed on a regular basis (e.g. every four or five years) to ensure it reflects current realities and the evolution of the economic, technological, policy context as well as increasing levels of climate ambition.

*How do we ensure effective and meaningful Indigenous participation in energy sector decision-making?*

Include Indigenous representation in the proposed Task Force at a minimum for the purposes of the LTEP. Indigenous knowledge and consultation are vital to ensuring a sustainable and equitable approach to energy and power planning in Ontario. Committing to supporting First Nation participation in planning and implementation is important and incorporating Indigenous knowledge and practices when implementing the LTEP is key to any successful outcome.

Sincerely,

Bryan Purcell  
VP, Policy & Programs, The Atmospheric Fund

### **About the Atmospheric Fund**

*The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.*