



February 1, 2024

Stephen Motluk
Ministry of Energy
Stephen.Motluk@ontario.ca

RE: South Central Ontario Region Economic Development Corporations Comments on Proposed Change to Support Building Homes and Transit Faster and Support Electrification by amending the Ontario Energy Board Act, 1998 Requirement for a Leave to Construct ERO # 019-8070

To whom it may concern:

Thank you for the opportunity to provide comments on Proposed Change to Support Building Homes and Transit Faster and Support Electrification by amending the Ontario Energy Board Act, 1998 Requirement for a Leave to Construct ERO # 019-8070.

South Central Ontario Region Economic Development Corporation (SCOR EDC) is a not for profit corporation owned by the counties of Brant, Elgin, Middlesex, Norfolk and Oxford. We represent just under one million residents in southwestern Ontario. SCOR EDC was incorporated in 2010 as a means to provide planning and coordination for regional issues.

SCOR EDC supports the Government's overall direction in modernizing the Leave-to-Construct (LTC) process and welcomes the opportunity to provide input on the Government's proposed changes to the Ontario Energy Board Act, 1998 (OEBA). The proposed steps would support the Government's objectives of building 1.5 million homes, expanding transit, reducing red tape, and lowering cost of access to the affordable, reliable, and resilient natural gas system.

The regulations to exempt energy projects costing between \$2 million and \$20 million from LTC, if duty-to-consult (DTC) is met will still support the intent of the Energy Board Act, 1998 (OEBA) but also take into consideration modern costs and value of infrastructure. Energy projects of this size often support transit projects, residential communities experiencing growth and investments which provide economic prosperity and support jobs. Access to natural gas is a critical infrastructure component in supporting advanced manufacturing and agricultural operations.

Taking into account the current LTC process and cost threshold determined in 1998 the updated proposal could cut regulatory process times in half. This streamlined regulatory timeline would go far in encouraging and attracting investment that is often forced to consider other jurisdictions due to increased regulatory timeline burden.

The \$2 million cost threshold established in the 90's is outdated and does not reflect current costs associated with infrastructure projects. The proposed exemption for projects valued between \$2 million and \$20 million is better aligned with other provinces such as British Columbia, where thresholds are \$15 million for electricity and \$20 million for natural gas.



In addition to direct time savings and regulatory updates the cost of preparing and having an LTC application hearing by the OEB currently ranges from \$50,000 to \$200,000, including OEB costs, intervenors' costs, and legal costs passed on to customers, which would be reduced through an expedited process.

The changes will still support the intent of the Act in ensuring the discharge of the Crown's duty to consult (DTC) is upheld.

In conclusion SCOR EDC supports the Government's proposal in updating the LTC thresholds to reflect costs of today while still maintaining regulatory checks and balances.

If you have any questions or require additional information, please do not hesitate to contact Bernia Martin, Chair of the SCOR EDC Board of Directors (bmartin@cityofwoodstock.ca).

Sincerely,

A handwritten signature in black ink that reads 'Bernia Martin'. The signature is written in a cursive, flowing style.

Bernia Martin
SCOR EDC
Chair of the Board of Directors

Cc: Minister Lisa Thompson
Cc: Minister Vic Fedeli
Cc: Associate Minister Rob Flack
Cc: MPP Will Bouma
Cc: MPP Bobby Ann Brady
Cc: MPP Ernie Hardeman