



April 5, 2024

MINISTRY OF ENERGY
77 Grenville Street, 7th Floor
Toronto, ON, M7A 2C1

Submitted via Environmental Registry of Ontario (ERO) Posting 019-8307

RE: Proposed Amendments to the Ontario Energy Board Act, 1998 to provide the government with the authority to ensure fair and informed decision-making at the OEB to foster affordable communities

The Canadian Biogas Association (CBA) extends its support for the *Proposed Amendments to the Ontario Energy Board Act, 1998 to provide the government with the authority to ensure fair and informed decision-making at the OEB to foster affordable communities*; and Bill 165, Keeping Energy Costs Down Act, 2024.

The CBA represents producers of RNG that are actively seeking to produce energy from biomass in a way that contributes to the Province's energy transition objectives by harnessing non fossil fuel sources of methane, converting that methane into renewable natural gas (RNG) and using that RNG to replace the use of conventional natural gas. An integral component of that undertaking is the continued availability of the natural gas infrastructure to move RNG from producers into the market and to the ultimate consumer.

We view the proposed amendments as having the potential to enable the opportunity to support and foster the integration and growth of the RNG sector in Ontario and the CBA would like to highlight three key points of alignment and support, which include:

1. **Stakeholder Engagement:** The CBA values the participatory approach in legislative proceedings and the regulatory process. We are eager to contribute our expertise and ensure the renewable natural gas industry's perspectives and interests are effectively represented and promoted at the regulator.
2. **Regulatory Efficiency:** The legislation proposes to streamline regulatory processes, thereby accelerating the deployment and development of RNG initiatives, catalyzing sectoral growth and innovation. Increasing the Leave to Construct threshold from \$2M to \$10M will reduce the regulatory burden making it less costly and more efficient for RNG producers to connect to the Enbridge Gas system and distribute RNG to customers across Ontario.
3. **Policy Certainty:** The CBA values policy certainty for industry and consumers in Ontario. The OEB and Government of Ontario are grappling with difficult policy questions and competing priorities, and while there is a role here for everyone to play and define what the energy grid in the future, a lack of policy clarity can lead to unintended outcomes. We value and see a need for mechanisms like those introduced in these regulatory changes to reduce that uncertainty, and establish clear direction to industry and consumers.



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The CBA recognizes the importance of ensuring the Government of Ontario sets energy policy as a priority of these regulatory amendments. This is especially true in light of this government's foresight to seek the valued advice and input of the Electrification and Energy Transition Panel as it navigates difficult and sometimes competing policy priorities. A clear policy framework and clear policy direction from the province is beneficial to the energy industry and will ultimately help support the economic growth of the province. The CBA also supports prioritizing customer choice with respect to energy options for homes and businesses – many of which who are seeking options, like RNG, that align with their clean energy objectives.

The CBA advocates for these provisions, anticipating that their implementation will yield substantial benefits for both the renewable natural gas sector, consumers, and the broader Ontario economy.

Sincerely,

Jennifer Green
Executive Director
Canadian Biogas Association