

May 12, 2024

Ministry of Energy
Fuels Policy and Liasson Branch
7th Floor, 77 Granville St.
Toronto, ON M7A 2C1

Re: ERO #019-8562

On behalf of the Canadian Fuels Association (CFA), we thank you for the opportunity to provide feedback on **ERO #019-8562 – Proposed Regulations Under the Ontario Energy Board Act, 1998 to Support Building Homes and Transit Faster by Prescribing Conditions for Fast-Tracking Approval of Certain Small Energy Infrastructure Projects**

CFA represents the producers, distributors and marketers of transportation energy, including gasoline, ethanol, bio-based diesel, jet fuel, as well as, specialty fuels and lubricants. Our sector represents 111,000 workers, fifteen refineries, eight Clean Fuels production facilities, 75 distribution terminals, and 12,000 retail and commercial sites. Our members supply 95% of the transportation fuel Canadians use every day, including the majority of Canada's biofuels. Ontario is home to five refineries located in Southwest Ontario, where we underpin Ontario's petro-chemical cluster, and eight clean fuel production facilities.

CFA members¹ are committed to a future where Canadians achieve significant transportation greenhouse gas (GHG) emissions reductions without compromising the ability to move people and goods. Our [Driving to 2050 Vision](#) highlights how Canada's transportation fuel sector is innovating and investing in the development of clean transportation-energy choices, which include reliable and affordable low-carbon liquid fuels.

CFA is supportive of the proposal for amendments to the Ontario Energy Board Act, 1998 to allow government to prescribe conditions in regulation to fast-track Ontario Energy Board approval of small natural gas pipeline projects. Fuel pipelines are the safest and most efficient form of transporting fuels across the province. CFA members own and operate many small and

¹ Canadian Fuels members: Braya Renewable Fuels, Federated Co-operatives Limited, Greenergy, Greenfield Global, Imperial Oil Limited, Irving Oil, North Atlantic, North West Redwater Partnership, Parkland Corporation, Petro-Canada Lubricants Inc., Shell Canada Limited, Suncor Energy Products Partnership, Tidewater Midstream and Infrastructure Ltd. and Valero Energy Inc.

mid-sized pipelines throughout the province. This proposal will ease the burden of any future expansion plans.

Additionally, we support adjusting the cost threshold to reflect the current cost environment. Thresholds established 20 years ago are no longer relevant to current economic conditions, and any policy proposal should do its best to remain up to date.

Finally, CFA believes it is appropriate to continue the required practice of Duty to Consult (DTC). The now well-established practice benefits not only affected indigenous communities, but also helps establish key partnerships for companies looking to develop forward looking plans.

CFA thanks you again for this opportunity to participate in this important work. Should you have any questions about these, or any other issues related to fuels and their place in Ontario's energy supply mix, please do not hesitate to reach out. We look forward to hearing from you

Sincerely,

A handwritten signature in black ink, appearing to be 'L. Tresise', written in a cursive style.

Landon Tresise
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