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642 Woolwich Street,

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December 16, 2016.

Attention: Andrea Pastori
Cabinet Liaison and Strategic Policy Coordinator,
Ministry of Energy,
Strategic, Network and Agency Policy Division
Strategic Policy and Analytics Branch
77 Grenville St.
Floor 6
Toronto, ON
M7A 2C1

Re: EBR 012-8840 – Planning Ontario’s Energy Future: A Discussion Guide

Dear Minister,

The Christian Farmers Federation of Ontario (CFFO) is an accredited farm organization representing the interests of over 4,000 farm families in the province of Ontario.

Ontario’s energy generation and energy use are tightly connected to our social and economic patterns, and have varying environmental impacts. As Ontario considers future energy needs, and future sources to provide that energy, the social, economic and environmental impacts all need to be carefully considered. While lowering energy sector greenhouse gas (GHG) emissions is an important goal, the choices of how to achieve this goal will have varying social and economic impacts that must also be weighed in the balance.

Although nuclear energy can be considered “clean” in the sense that it does not produce GHG emissions, it does produce other forms of waste which have significant social and environmental costs to manage long into the future. Likewise, while the push for green energy generation in Ontario has created some positives for Ontario’s clean-tech sector it has also resulted in significant costs to rate payers. This has put our agricultural industry at a significant competitive disadvantage within the rest of Canada, and with the United States. These economic and social impacts cannot be ignored in the pursuit of reduced GHG emissions.

Electricity and Fuel Pricing

The high costs of electricity in Ontario are having significant social and economic impacts for all Ontarians, but are not borne equally across the province. Customers in rural and remote areas are more significantly impacted by these high costs. Electricity pricing should more evenly spread the delivery costs across all customers in the province.



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Because high costs for energy have such negative social and economic impacts, any changes to the energy system must consider cost-effective means of achieving desired goals. Rate mitigation efforts will continue to be important to help address the social and economic impacts of current high energy prices, especially for those with low and fixed incomes. This should be done through existing support programs within the tax act.

Transparency in pricing is important for both our electricity and fuels, so that consumers are aware of the costs they are paying and are better motivated to reduce their consumption patterns. The costs of using fossil fuels that will now be included through the cap and trade system need to be clearly indicated in the pricing breakdown. This will better incentivize adoption of conservation practices and new energy efficient technologies.

Changes on the Horizon

Our energy infrastructure for both fuels and electricity are vital to the health of Ontario's economy, and must be continually modernized and maintained. In particular, expanding the natural gas infrastructure in rural Ontario will have many benefits including for agricultural businesses. Furthermore, as Ontario looks to reduce fossil fuel use, this infrastructure will still be useful with increasing incorporation of renewable natural gas into the mix.

Because significant power is lost through current transmission and storage technology, local generation of power should be promoted wherever possible. With this in mind, innovation to accommodate microgrids will be valuable for increasing the efficiency and the reliability of the electricity system. Research and development investments on innovation in storage technology needs to be supported, and should focus on small-scale storage solutions, as part of a local generation system.

Renewable sources of energy generation should provide a significant portion of our energy generation mix. However, these forms of energy generation are not equal, and their costs and benefits need to be carefully considered.

Hydroelectric energy can provide baseload generation, and should be encouraged. Solar generation projects should focus on rooftop locations or small rotating land-based solutions, and should not be built over productive farmland. Wind generation projects have caused significant social strife in rural communities. These projects need to take a community approach to ensure that they have the support of the wider community where they are installed, and that the benefits of these projects are shared amongst those who are also bearing the costs.

There is significant opportunity to expand renewable natural gas, and biofuels including ethanol in our fuel mix. While solar generation is suitable on buildings, large solar projects that take arable land out of production cannot be seen as beneficial, and should be stopped. It makes more sense to capitalize on the biofuel opportunities that exist from agricultural residues, and food and animal waste generated in the agri-food system, and to keep that farmland in production. Active farmland produces complex environmental and social benefits including



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healthy soils, water cycling, carbon sequestration, and increased biodiversity, all while also capturing energy from the sun.

Thank you for this opportunity to provide our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Nywening".

Clarence Nywening, President

Christian Farmers Federation of Ontario