

September 20, 2013

Yvonne Di Tullio
Senior Policy Advisor
Ministry of Energy and Energy Efficiency
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Toronto, ON
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By email: Yvonne.ditullio@ontario.ca

Re: Conservation First - EBR Posting # 011-9614 Posted July 16, 2013

Dear Ms. Di Tullio:

CELA is pleased to write this letter in support of the government's proposal, "Conservation First: A Renewed Vision for Energy Conservation in Ontario". This discussion paper was released in the summer of 2013 in parallel with a number of other energy consultations which have been underway by the province. These include the Long Term Energy Plan consultation, consultations on Community Energy Planning (a decision has since been released by the province encouraging same), Regional Energy Planning, and siting of major energy projects, to name a few. We have provided separate submissions on those other consultations, specifically regarding the LTEP under the EBR posting and to OPA in respect of Regional Energy Planning.

CELA is strongly supportive of the Conservation First discussion paper. We entirely agree that as the paper states, "Conservation should be the first resource considered when planning for the province's electricity needs."

We urge the province to make this statement a reality by embedding it in all decision making in the province with respect to Ontario's energy system. This should include requiring aggressive procurement of conservation by OPA; requiring ambitious targets for conservation in the LTEP; requiring the IESO to take account of ambitious conservation targets in its system projects and system planning; acting to develop and pass the regulations for municipal, government and related sectors for development and implementation of conservation plans under the *Electricity Act* (in part by way of amendments to that Act enacted in the *Green Energy Act*). We also encourage the Minister to issue directives to enable the implementation of the Conservation First vision to the OPA and the Ontario Energy Board. These directives should include clear statement of government policy in respect of requiring and enabling conservation as a

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preferred approach by Ontario electric utilities and the expectation of government that the OEB's decision making processes should support this policy expectation.

CELA also recommends that the government proceed with initiatives for consumer bill reform so that consumers will much better understand their electricity bills. This should include standardized terminology, clear statements of the various components of the bill, and clear references to resources for low income consumers who have difficulty with bill payments. In addition CELA strongly supports inclusion of tools whereby consumers can measure their household consumption against a target and/or a neighbourhood mean.

CELA also encourages the government to ensure that the scope for increased conservation in the future is not constrained by decisions for large power procurement from nuclear power in particular. This is of concern because the over-stating of future demand has been used repeatedly to justify a continued policy of refurbishment and even new build nuclear power even in the face of a continued and sustained downward trend in demand in Ontario. Making massive investments in additional nuclear power will result in continued base load surplus power and in turn diminishes institutional and political support for conservation even though conservation would have been and will continue to be a much less expensive option. This was demonstrated in the IPSP which was never finalized, but in which the targets for conservation were diminished in future years when the system planners anticipated that they would have succeeded in refurbishment and/or new build of nuclear power and thus would have little room left for additional renewable or additional conservation after that time (at that time it was around the year 2018). This type of gaming of future predictions of demand and supply must not be allowed to continue and the government should require all of the energy institutions within its mandate to truly pursue and embed a conservation first approach in the province. This will require a major culture change in the institutions of the Ontario government.

CELA also endorses the submissions you have received from the Low Income Energy Network to respond to the major problems of energy poverty and encourage you to pursue an integrated approach to responding to low income energy needs by way of continuing and expanding low income conservation efforts, continuing emergency resources for low income households with bill payment difficulty, continuing to encourage the OEB and all of the utilities both gas and electric to improve the customer terms of service, and initiating a low income rates assistance program as LIEN has submitted in other contexts.

CELA also endorses the Renewables is Doable report released September 2013, by Weiss, Stensil and Harti, of Pembina and Greenpeace which outlines specifically the extensive opportunities for further conservation in Ontario.

In addition, CELA has had the benefit of a copy of the July 31, 2013 submission by the Energy Services Association of Canada, "Initial Comments on 'Making Choices: Reviewing Ontario's Long Term Energy Plan'" (www.energyservicesassociation.ca) and

specifically its comments with respect to the need for specific and ambitious but achievable targets. We agree with their submissions regarding demand reduction targets as well as consumption reduction targets; utilization of interim targets; sector targets; and integration with gas and oil conservation.

In conclusion, CELA reiterates our strong support for the Conservation First vision. We encourage the government to proceed to implement this vision and embed it within the Ontario electricity system.

We would be happy to answer any further questions.

Yours very truly,
CANADIAN ENVIRONMENTAL LAW ASSOCIATION

A handwritten signature in black ink, appearing to read 'Theresa A. McClenaghan', written over a faint, light-colored circular stamp or watermark.

Theresa A. McClenaghan
Executive Director and Council

cc.
Minister of Energy, Hon. Bob Chiarelli
Environmental Commissioner of Ontario, Gord Miller