

# Feedback Form

## Future Clean Electricity Fund – October 13, 2023

### Generators

#### Feedback Provided by:

Name: Jennifer Green

Title: Executive Director

Organization: Canadian Biogas Association

Email: [REDACTED]

Date: Friday, October 27, 2023

Following the October 13, 2023 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [Future Clean Electricity Fund](#) web page.

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **October 27, 2023**.** If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Topic	Feedback
<p>What barriers for new electricity generation projects have you encountered in the province?</p>	<p>There are approximately 56 biogas facilities in active operation across Ontario. They provide needed non-emitting electricity generation, as well as agricultural, and economic benefits to local communities. Many of these facilities will come offline as early as 2025, as there are no mechanisms currently in place to extend their contracts. At the same time, there exist no preferable pathways to build new biogas facilities in the province.</p> <p>In its Pathways to Decarbonization report, the IESO has assumed the ongoing participation of existing bioenergy facilities.</p> <p>FCEF funding streams to support the continued operation of these facilities, their participation in future procurements and programs, and to support the technical assessments necessary to assess the development of new biogas sites should be considered, in conjunction with future re-contracting opportunities.</p>

Topic	Feedback
<p>What type(s) of support from the IESO would facilitate new clean electricity project development?</p>	<p>To ensure that biogas is eligible for the FCEF, CBA requests that the IESO expand the definition of “Clean Electricity” to specifically include biogas:</p> <ul style="list-style-type: none"> <li>- Biogas is a renewable electricity source, created when organic matter breaks down in an oxygen-free environment. Biogas can also be upgraded to Renewable Natural Gas (RNG), which is carbon neutral and a pathway to reducing emissions in the broader energy sector.</li> <li>- Biogas is created from organic materials or carbon sources found in livestock manure, crop residues, and landfills. It reduces CO2 emissions by capturing methane, a potent greenhouse gas, and preventing its release into the environment.</li> </ul> <p>In addition to being a clean, naturally occurring electricity source, biogas can also be upgraded and converted into Renewable Natural Gas (RNG), which serves as another low-carbon alternative fuel source to traditional natural gas. Accordingly, RNG fuel sources should also be considered alongside biogas in an expanded definition of clean electricity within the FCEF framework.</p>

Topic	Feedback
<p>Do you have any projects under development that would benefit from the FCEF support?</p>	<p>There are over 56 biogas facilities in operation in Ontario. CBA estimates that there is potential for an additional 250 MW of new biogas generation across the province.</p>

Topic	Feedback
<p>Are there any additional potential funding streams the IESO should consider?</p>	<p>The CBA does not have any additional funding streams to recommend at this time.</p>

Topic	Feedback
Should any of the identified potential streams be recommended? Removed from consideration? If so, why?	<p>The CBA believes that the following funding streams would be best positioned to support biogas projects: (2) Customer-sited energy; (6) Site-screening stream; (7) LDC Permitting Support; (9) Competitive procurement offsets; and (10) Municipal Capacity building. The CBA emphasizes its support for Stream #2 "Customer-Sited Energy." Biogas projects are often located on existing farms, landfills, and industrial sites, operated by local farmers and landowners, municipalities, and companies. They rely on their biogas operations as part of their existing day-to-day businesses, to support environmental benefits (like soil health, digestate products, methane capture), agricultural purposes and supporting economic growth within their communities. As such, biogas operators across the province would greatly benefit from funding to help cover the development and operating costs of their facilities. This stream could also help fund necessary storage upgrades for operators who wish to expand their facilities to generate electricity at times when it is most beneficial to the grid in the future. The site screening option could be expanded to consider the needs of prospective biogas developers. As farmers, municipalities, and business consider biogas as an option, funding mechanisms for studies and technical and feasibility assessments would be useful. The IESO should also consider expanding the definition of Stream 9: "Competitive Procurement Offsets," to also include other acquisition mechanisms, such as programs, which may also be used by the IESO to secure future clean energy projects, and which is also a mechanism outlined in the IESO's Resource Adequacy Framework.</p>

## General Comments/Feedback

Ontario's biogas sector is prepared to leverage new and existing assets to help the province maintain sufficient energy supply, while also supporting the decarbonization of our electricity system. The Future Clean Electricity Fund presents an opportunity for the IESO and the Ontario government to place renewed consideration on Ontario's biogas sector and leverage existing and new assets to provide reliable clean electricity and accelerate decarbonization efforts in the province.