

Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

Name: Marcelline Riddell

Title: Director, Government Relations

Organization: Canadian Propane Association

Email: [REDACTED]

Date: June 17, 2021

To promote transparency, feedback submitted will be posted on the Gas Phase-Out Impact Assessment webpage unless otherwise requested by the sender.

Please provide feedback by June 17, 2021 to engagement@ieso.ca. Please use subject:

Feedback - Gas Phase-Out Impact Assessment

Questions

Topic	Feedback
Are there additional considerations the IESO has not identified in defining the scope of the assessment to examine the reliability, operability, timing, cost and wholesale market implications of reduced emissions on the electricity system?	Click or tap here to enter text.

General Comments/Feedback

June 17, 2021 Ms. Lesley Gallinger, President and CEO Independent Electricity System Operator 1600-120 Adelaide Street West Toronto, ON M5H 2N2 Re: IESO Engagement Plan on Ontario Phase Out of Gas Fired Electricity Generation Dear Ms. Gallinger, Thank you for the opportunity to provide our comments on the IESO's engagement plan regarding the recent municipal motions proposing the shut down of Ontario's gas-fired electricity plants in an effort to meet climate change targets. The Canadian Propane Association represents over 400 propane producers, retailers, wholesalers and distributors providing propane fuel and technology to thousands of homes, businesses, agricultural enterprises and institutions across the province. Over 125 propane businesses operate in Ontario, with just over 37% of Canada's overall propane use occurring here. A by product of natural gas, propane is a low-emission, cost-effective, accessible energy option with benefits for governments and consumers. Propane has similar greenhouse gas (GHG) emissions as natural gas, but unlike natural gas, does not release fugitive emissions before use. Converting from home heating oil to propane is cost-effective and results in an almost 40% reduction in GHG emissions. The CPA is supportive of reducing the carbon footprint. However, the CPA is of the view that for now, Ontario and most specifically Ontario consumers, manufacturers, commercial and institutional users must have access to clean, reliable and affordable energy, especially as we begin to prepare for robust post-pandemic economic recovery. The CPA does not support energy policy determinations that could increase costs, negatively impact operability and reliability of Ontario's power grid, reduce local and regional dependability, or jeopardize voltage consistency. As a contributor to the province's successful suite of energy options, the propane sector opposes any proposal that would see Ontario's energy choices diminished by eliminating one, or more, cleaner, reliable, power source, whether natural gas or propane. Climate events, like the one Texas experienced in February 2021, demonstrate that communities need failsafe primary and back-up power sources such as low-emission propane now more than ever, and the significant interdependence of all energy systems and sources. Propane can also play a part in helping the province meet climate change goals by reducing GHG's in the immediate term in the largest contributing sector; transportation. Our industry is working with local governments today to help make the air, land and water in communities cleaner. Whether reducing toxins and emissions in school bus, police or municipal fleets, propane provides viable, at the ready, power, with renewable propane just around the corner. The London Police Service has run their vehicles reliably on propane for over 30 years, enjoying reduced fuel and maintenance costs and environmental benefits. Renewable propane which is commercially available in Europe and the southern United States and could be available in Canada soon, provides for even greater reductions in GHGs. As the IESO notes in its letter

to Toronto Council on March 9, 2021, “We must not underestimate the impact that taking gas out of our supply mix by 2030 would have on the electricity system. Such an undertaking requires a comprehensive plan to find and invest in suitable replacement supply and reorient the system around the new supply mix. Any rush to transition away from gas generation brings with it added costs and reliability risks.” There is not one only solution to reducing emissions while supporting better livelihoods, jobs and communities. Many industries and municipalities are already exploring other energy sources, including the many advantages of propane, and our industry is ready to support more of this good work. Sincerely, Marcelline Riddell, Ontario Director, Government Relations, Canadian Propane Association