

# Feedback Form

## Gas Phase-Out Impact Assessment – May 27, 2021

### Feedback Provided by:

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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](mailto: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

Dear IESO,

We, the Environmental Action Group and Board of First Unitarian Congregation of Ottawa, are writing on behalf of the Congregation. We are pleased that the IESO recognizes that an ever growing number of municipalities, now representing a majority of the population of Ontario, are demanding that the Province of Ontario phase out gas-fired power plants by 2030, and that it has chosen to include public engagement in investigating the process by which this may be accomplished.

Unitarian Universalists in most of the world affirm and promote seven principles (see <https://cuc.ca/unitarian-universalism/principles-sources/>). Our Seventh Principle concerns "the respect for the interdependent web of all existence of which we are a part". As such, it follows that we would like to see Ontario's climate change commitments be a priority in this engagement process and in the resulting reports. We strongly support the phasing out of gas-fired electricity in Ontario by 2030 and oppose any increase in its use to meet future requirements. It is our assessment that the Gas Phase-Out Engagement Objective does not recognize the pressing nature of the climate emergency in which we find ourselves, a crisis recognized not only by hundreds of municipalities and the federal government of Canada, but by the International Energy

Commission. It must be the prominent consideration when we evaluate how we choose to provide electricity to the people of Ontario.

Since 2018, Ontario's carbon emissions have been on the rise - for the first time in a decade. Natural gas makes up about 6% of Ontario's electricity generation but produces the majority of its emissions. Ontario will need increased production as aging nuclear structures are closed or refurbished. Plans to make up this difference with renewables, energy conservation and other programs were derailed in 2018 when the present government of Ontario cancelled more than 750 programs designed to do just that. Present plans have Ontario increasing the use of fracked gas, thereby contributing not only to climate change with tripling emissions by 2030, escalating air pollution and further environmental racism, but to steeply increased costs as well. Ontario has promised to cut emissions by 30% by 2030. Yet the present plan to increase dependence on gas forecasts a steady increase of emissions with a tripling by that date. We cannot let this happen.

Renewable and now dependable forms of energy, like that from wind and solar, are cleaner and less costly than that from gas plants. Ontario needs to encourage, rather than block, renewables from entering the grid and to reinstate programs of energy conservation. It needs to join other provinces and countries, who are in the process of phasing out fossil fuels and transitioning to zero-carbon electricity systems. Ontario municipalities are pursuing decarbonisation plans, but they cannot achieve their goals without zero carbon electricity from the province.

Comments on the three proposed scenarios:

1. A complete phase-out of gas by 2030 with a supply mix of new resources, in response to municipal council resolutions.

Recently, the International Energy Agency warned that if the world wishes to keep global warming below 1.5 degrees Celsius, we must rapidly phase out the use of fossil fuels and rapidly increase our use of clean and

renewable energy. In view of this, and our previously stated focus that Ontario's climate change commitments be a priority in this engagement process, there is no other rational choice than option one. We support the approach of the Ontario Clean Air Alliance, that of designing and using an integrated and balanced combination of energy efficiency and demand response; wind and solar energy; and renewable electricity and storage resources. This would include working with the many Ontario municipalities who have designed their own energy efficiencies and renewable energy opportunities, and with the Province of Québec who have offered hydro power and storage.

2. A market –based approach that examines the potential for higher gas prices to reduce the utilization of the gas fleet to reduce emissions by 2030 and to provide market signals to clean energy projects.

This would not appear to lead to a phase out of natural gas by 2030, only a reduction of emissions, with no estimate of when or if net zero will ever be reached. This is not acceptable. In addition, if gas fired electricity were to be taxed to the true cost of its emissions, the people of Ontario would be paying extremely high costs for electricity which would still be polluting. Small increases in costs will not create change quickly enough to meet our necessary targets. A more cost effective and cleaner solution would be the use of renewables.

3. Reduce emissions by 2030 with a supply mix approach of new resources.

Scenario three appears very non-specific and seems to be based on the assumption that something will show up. While indeed useful new resources may show up, to depend on unknown resources to effectively decrease emissions to the extent needed is foolhardy. As in scenario two,

this would not appear to lead to a phase out of natural gas by 2030, nor is there any estimate of the reduction target.

For both scenarios two and three, going more slowly than a 2030 phase out, will result in the social and health costs of continuing or increasing carbon emissions, which must be taken into consideration. In addition, there could be legal consequences if the province be taken to court by the climate activist community with a failure to meet the Paris Accord or the 2018 IPPC report.

It becomes clear, if we wish to advance to a zero carbon future, as we must, that scenario one is the necessary choice.

We look to the IESO to provide a credible framework to guide Ontario towards a zero carbon future with a balanced plan of energy efficiency and renewable energy and away from the critical mistake of allowing ever rising emissions due to the ill-advised choice of continued use of fossil fuels.