

IESO Engagement

From: Sonja Wilson
Sent: March 9, 2022 11:35 AM
To: IESO Engagement
Subject: Ontario's Clean Energy Credit Trading System is Terribly Flawed

Hello,

I am writing to voice my opposition to the IESO's clean energy credit trading system. I am not opposed to clean energy credits, however the current proposal for the trading program will do nothing to increase low-carbon electricity generation in Ontario, and allow corporations to advertise (and think) that they are reducing their emissions, all while doing nothing to *actually reduce* emissions.

A fundamental quality of an emissions offset is the proof of additionality (the emission reduction would not have happened without the creation of the offset program). The same test should be applied to the clean energy credits – there should be a requirement that the credit applies to NEW low-carbon electricity that is funded through the creation of tradable clean energy credit. Otherwise the system is just giving credit to corporations to keep doing the same thing they were already doing anyway.

In addition, the revenue from the clean energy credit program should be invested in additional low-carbon energy generation capacity, not in subsidizing electricity rates for increasingly high-emissions power.

This clean energy credit program, as proposed, will have the effect of increasing emissions in the province. I implore you to redesign the program so that it actually increases low-carbon electricity generation in the province and enables responsible corporate citizens to purchase additional low-carbon electricity to reduce their emissions.

Best regards,
Sonja

Sonja Wilson, MSc, PEng
Principal, Reshape Infrastructure Strategies Ltd.
409 Granville Street, Suite 925
Vancouver, BC V6C 1T2


www.reshapestrategies.com
www.linkedin.com/in/sonja-wilson-b75bb331/