

Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

Name: Shareen Yawanarajah

Title: Senior Manager, Global Energy

Organization: Environmental Defense Fund

Email: [REDACTED]

Date: 8 June 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

Dear Mr. Young,

Thank you for the opportunity to provide feedback on the IESO's assessment of Gas Phase-out in Ontario.

We commend Ontario's progress in reducing emissions from its electricity sector through the elimination of coal-fired generation. However, the province's emissions are projected to rise significantly in the coming years without further measures in place. We therefore wish to propose a market-based mechanism that can help ensure that emissions from Ontario's electricity steadily ramp down. We note that this mechanism can be employed with or without a longer-term phase out of natural gas.

We would encourage Ontario to consider an emissions performance standard on all purchased gas used for electricity generation. This standard can ensure that the natural gas is produced using global best practices that reduce GHG emissions, particularly with regard to methane, one of the most potent GHGs. There are now a range of technologies that exist to reduce such emissions, including leak detection and remediation, and measures to eliminate venting and flaring. The federal government has a regulated target to reduce such emissions by 40-45% by 2025, and globally, there are a number of jurisdictions coalescing around a 65-75% reduction target by 2030.

Responding to consumer demands for cleaner fuels, the private sector has also responded to this challenge. A recent agreement between Seven Generations Energy (7G) and Québec's main natural gas distributor, Énergir was driven largely by consumer demand for cleaner energy and is governed by a new standard for transparency (EO100) across the value chain that includes methane emissions reductions from production. 7Gen is receiving a small price premium for its certified gas supply.

Reducing GHG benefits through a performance standard presents a number of benefits to the province:

- It enables both provincial and municipal governments to reduce their emissions significantly, responding to the need to address climate change concerns.
- It provides a transparent, predictable market signal to natural gas producers to maintain global best practices with regard to how natural gas is produced.
- It provides flexibility to adjust performance levels as technology and levels of ambition develop.

I hope you will consider a performance standard as part of your strategy to further reduce GHG emissions from Ontario's electricity sector. We would be happy to provide more information.

Sincerely,

Shareen Yawarajah
Senior Manager, Global Energy
Environmental Defense Fund