

Submitted by email to: engagement@ieso.ca

June 17, 2021

RE: York Region's Response to Gas Phase-Out Impact Assessment

To whom it may concern,

York Region staff thank the Independent Electricity System Operator (IESO) for consulting and seeking feedback from municipalities interested in phasing out natural gas from the provincial electricity supply mix. York Region is very supportive of the IESO undertaking a comprehensive assessment of phasing out natural gas. This letter outlines key recommendations from staff.

York Region is committed to energy planning and reducing greenhouse gas emissions

York Region Council continues to demonstrate leadership and a commitment to energy planning and greenhouse gas emissions reduction. Vision 2051, York Region's Official Plan, and our Corporate Energy Conservation and Demand Management Plan are in alignment with Federal and Provincial targets. There are a number of ways in which York Region is supporting greenhouse gas emission reductions and renewable energy:

- A strategic goal of net-zero greenhouse gas emissions by 2051
- Development of municipal energy plans that identify priority actions to achieve community-wide greenhouse gas emissions reductions, including fuel switching to low emissions electricity (e.g. fleet electrification)
- Policies that support the use of renewable energy systems in community design and new development
- Implementation of renewable energy systems to reduce corporate greenhouse gas emissions

York Region is committed to action that mitigates the impacts of climate change. We aim to achieve net-zero carbon goals in support of commitments made by Canada. In 2015, based on the Paris Accord, Canada committed to reducing its greenhouse gas emissions by 30% below 2005 levels by 2030. To date, Canada is not on track to meet these commitments. The Auditor General of Ontario reports that meeting the Province's own targets will require aggressive measures to reduce emissions by up to 14 million tons of GHG emissions.

Prioritizing renewable energy ensures alignment with legislated municipal energy plans

York Region is engaged in Provincial energy planning exercises in partnership with the Province and IESO to ensure that regional and local municipal priorities are addressed and consistent with our community energy plans. Community energy plans identify strategies necessary to meet greenhouse gas emission reduction targets. A key strategy is fuel switching to low emissions electricity (e.g. electric vehicles). This is why ensuring electricity supply remains as clean as possible is so vitally important. Eliminating natural gas generation from the Provincial electricity supply will help York Region and our communities reach greenhouse gas emission goals.

Municipalities have a legislated requirement to develop Energy Conservation and Demand Management Plans, including strategies to reduce greenhouse gas emissions. Fuel switching to low emissions electricity are among key strategies pursued by many Ontario municipalities, including York Region. Decisions that increase grid-supplied electricity emissions undermine investments municipal governments have made towards meeting these objectives.

Provincial long-term energy planning by the IESO and Ontario Energy Board (OEB) needs to continue to engage municipalities over the long-term and ensure effective integration with regional and local plans. York Region is supportive of decisions for energy planning to balance needs while prioritizing greenhouse gas emissions, reliability and costs.

Access to low-emission electricity requires long-term planning and action to address decommissioning and maintenance of existing nuclear assets

There are financially viable, zero-emission options available to reliably address the closure of the Pickering Nuclear Station and maintenance requirements at other sites. The most notable options are upgrades to interconnection capacity with Quebec's hydro electricity grid, conservation, and renewable energy generation. Choosing to increase natural gas electricity generation related emissions by 400% by 2040 should be the last option, not the first.

Today's needs require forward looking clean sources of energy to combat climate change and enable downstream investments to minimize emissions in other sectors. York Region encourages the IESO to make the necessary adjustments to plans that rise to this challenge.

Province should establish maximum limits for aggregate greenhouse gas emission intensity to create predictability

Many large organizations in Ontario are working to reduce their emissions and meet emission targets under the Paris accord, but are unable to plan effectively without dependable emission intensities for electricity generation. It is requested that the IESO give preference to zero-emission sources of electricity supply that sustains Ontario's leadership role in low emission electricity.

The IESO should consider all environmental and health costs associated with the use of natural gas

The IESO is proposing to assess implications associated with the phase-out of natural gas electricity based on reliability, operability, timing and cost. The IESO should also consider assessing environmental and health costs associated with the use of natural gas, including future prices on carbon. These considerations may buffer the Ontario electricity system from future pricing shocks.

York Region staff look forward to engaging the IESO throughout development of this assessment and will be attending the June 24, 2021 webinar. Please address further communication and inquiries to Ershad Kazemi, Manager, Climate Change and Corporate Energy Conservation at [REDACTED] and Teresa Cline, Program Manager, Long Range Planning at [REDACTED].

Sincerely,



David Szeptycki
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The Regional Municipality of York

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