August 8, 2022

BY EMAIL: ECD-DEC@ec.gc.ca

The Honourable Steven Guilbeault  
Minister of the Environment and Climate Change  
Ottawa, Canada  

Dear Minister Guilbeault:

Re: Proposed Frame for the Clean Electricity Regulations

Introduction

I am writing to provided you with the Ontario Clean Air Alliance’s (OCAA) submissions with respect to the Government of Canada’s Proposed Frame for the Clean Electricity Regulations.

It is our submission that the proposed Regulations have the following loopholes that are not in the public interest:

1. They don’t apply to hydrogen power plants despite the fact that the greenhouse gas (GHG) emissions of a grey hydrogen power plant are greater than those of a conventional gas-fired power plant.
2. They don’t require a reduction in electricity sector GHG emissions before 2035.
3. They don’t prohibit non-emergency gas-fired electricity generation in 2035 or beyond.
4. They don’t subject emergency gas-fired electricity generation to the federal carbon tax.

Phasing-Out Ontario Gas Power by 2030

More than 60 non-governmental organizations, including the Registered Nurses’ Association of Ontario and the David Suzuki Foundation, have called for an Ontario gas power phase-out by 2030.
Thirty-three Ontario municipalities, that represent almost 60% of Ontario’s population, have passed resolutions calling for the phase-out of gas power.

Premier Ford has said that he won’t be happy until Ontario has a zero-carbon electricity grid.

Our report, Getting Ontario to a Zero-Carbon Electricity Grid by 2030, shows that Ontario can phase-out gas power by 2030 and lower its electricity costs by investing in energy efficiency, wind and solar energy and bi-directional EV chargers; and by purchasing Quebec waterpower and storage services.

Submissions

It is the OCAA’s submission that the Government of Canada’s Clean Electricity Regulations should:

1. Prohibit the building of new gas-fired power plants in Ontario.
2. Prohibit the building of new grey and/or blue hydrogen power plants in Ontario.
3. Only permit emergency gas-fired electricity generation in Ontario as of January 1, 2030. That is, allow Ontario’s existing gas-fired power plants to remain on standby reserve between 2030 and 2040 so that they can provide emergency back-up power to the provincial electricity grid if Ontario temporarily has insufficient carbon-free electricity resources to meet its needs due to an extreme event.
4. Subject 100% of the greenhouse gas emissions of emergency gas-fired electricity generation to the federal carbon tax.

Yours sincerely,

Jack Gibbons
Chair