



ONTARIO
CLEAN AIR
ALLIANCE

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 provide 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

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