



**ONTARIO
RIVERS
ALLIANCE**

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Rachel Thompson
Ministry of Energy, Northern Development, Mines
Strategic Network and Agency Policy Division
77 Grenville Street, 6th Floor
Toronto, ON
M7A 2C1

By email: Rachel.Thompson@Ontario.ca

Re: ERO-019-3007 – Reviewing Ontario’s long-term energy planning framework with a view to implementing a new, transparent, more predictable, and reliable planning process

Dear Ms. Thompson:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore riverine ecosystems all across the province. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

The Ministry of Energy, Northern Development and Mines (ENDM) is proposing to refocus Ontario’s long-term energy planning framework to increase the effectiveness, transparency and accountability of energy decision-making in Ontario, and increase investment certainty. The ENDM has already revoked the Ontario Regulation directing the government to publish a new Long-Term Energy Plan every three years and is requesting feedback from stakeholders to inform the Ministry’s plans for reforming the long-term energy planning in Ontario. The ORA will answer the targeted questions provided:

1. The best way to promote transparency, accountability and effectiveness of energy planning decision making is through public and stakeholder consultation and participation. It’s important that raw data, reports and energy programs/initiatives/incentives are immediately made available on the IESO website for public access. The IESO has already been doing a good job at consultation and transparency and we would hope this will only improve. However, the OEB could improve in this area.
2. The overarching goals and objectives of the IESO should be to provide the most cost-efficient and environmentally sustainable power generation and electricity distribution systems over the short and long-term.
3. The government should let the IESO and OEB make decisions in the best interests of the rate payer and the environment.
4. Technical planners should ensure the short and long-term delivery of the most economically and environmentally sustainable forms of power generation.



5. Government should provide oversight to ensure the IESO and OEB are fulfilling their mission and mandate in the best interests of the customer regarding rates, costs and reliability.
6. The ORA is not aware of any current gaps in the IESO or the OEB's mandates and objectives that would limit their ability to effectively lead long-term planning. ORA recommends it remain that way.
7. The Auditor General should prepare an independent audit once every 5 years to ensure the government, the IESO and the OEB are fulfilling their mission and mandate and that the customer experience, as well as the system's economic sustainability are its top priorities.
8. The government should provide annual guidance and direction to keep abreast of current developments and to facilitate effective short and long-term energy planning.
9. Effective and meaningful Indigenous participation must be a priority in energy sector decision-making. This can only be done through meaningful consultation and engagement with First Nation communities.
10. No new hydroelectric projects should be included in the short or long-term energy plan. Hydroelectric power generation is dirty energy resulting in significant ongoing negative impacts to riverine ecosystems, including, but not limited to GHG emissions (methane and Co2), degraded water quality, declining fish populations, methyl mercury contamination of fish, and ongoing harm to Indigenous communities.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
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