



June 14<sup>th</sup>, 2022

**Nancy Marconi**

Registrar

Ontario Energy Board

2300 Young Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

**Re: Ontario Power Generation Clean Energy Credits**

Dear Ms. Marconi:

The City of Ottawa declared a climate emergency on April 26, 2019. On October 28, 2020, City Council unanimously approved Energy Evolution, the City's community energy transition plan. Energy Evolution identifies short-, mid- and long-term targets to achieve community emission reductions of 100% by 2050 and corporate emission reductions of 100% by 2040, in an effort to keep global heating below the crucial threshold of 1.5°C.

Electrification will play a critical role in achieving these emission reductions. Since the Energy Evolution plan will see the City remain heavily reliant on the Province's bulk electricity system for its energy, Ottawa is advocating for zero emission generation at the provincial level to help reach its targets.

The City has recently learned that Ontario Power Generation has been selling clean energy credits to buyers outside of Ontario. Ottawa is concerned that this practice is removing the environmental attributes from the electricity our community consumes, thereby increasing its scope 2 emissions related to electricity consumed in our community.

The City of Ottawa requests that the OEB re-open EB -2020-0290 relative to this issue or institute a proceeding to consider the impacts of this practice. As a regulator, it may become incumbent upon the OEB track the development and impacts of clean energy credit trading and perhaps regulate a prospective clean energy credit market.

Thank you for your consideration. The City of Ottawa is at the Board's disposal to discuss our concerns further.

Sincerely

Mike Fletcher,

Climate Change and Resiliency  
Economic Development and Long-Range Planning  
Planning, Real Estate and Economic Development  
City of Ottawa

