

Sent by Email

May 11, 2022

Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4

Attention: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: Ontario Power Generation Clean Energy Credits

The Ontario Sustainable Energy Association (“OSEA”) is in receipt of Environmental Defence's letter dated May 2, 2022 requesting that the Ontario Energy Board (“OEB”) re-open or institute a new proceeding to consider issues relating to Ontario Power Generation's (“OPG”) sale of Clean Energy Credits arising from rate-regulated assets.

OSEA is also in receipt of OPG's responding letter dated May 6, 2022, and Environmental Defence's further response dated May 6, 2022.

OSEA supports Environmental Defence's request for a process to consider the Clean Energy Credit issue.

In particular, OSEA agrees with Environmental Defence that the sale of Clean Energy Credits has the potential to undermine the efforts of municipalities in ensuring a clean energy supply, and that the potential impacts on municipalities are material.

For example, Environment Defence notes the potential negative impact on carbon emissions intensity for Ontario consumers. OPG's sale of Clean Energy Credits out of province limits the credits available for Ontario communities to purchase or retire. Understanding how the credits are distributed and the impact on Ontario consumers is an important consideration for communities and municipalities in meeting their sustainability and net-zero objectives.

In addition, the lack of transparency on the quantity of Clean Energy Credits created and sold to neighbouring jurisdictions creates a clear barrier for municipalities and communities in accurately assessing and reporting on emissions intensity for their energy use. The inability to assess and report on the emission intensity of electricity consumption will materially impact municipalities' and communities' investments in new infrastructure (e.g., buildings) and operating assets (e.g., fleets) that use electricity to meet sustainability and net-zero objectives.



Finally, the value of Clean Energy Credits is changing rapidly as carbon pricing evolves, climate change objectives are tightening and communities commit to investments in net-zero operations. OPG's sale of Clean Energy Credits may be undervaluing Clean Energy Credits in Ontario.

Given the potential impact of Clean Energy Credit sales on municipalities and others, OSEA agrees that there is value in having a proceeding so that interested parties and the OEB can explore this issue with the benefit of evidence and stakeholder perspectives.

Yours truly,

Raeya Jackiw

cc: Dan Goldberger, OSEA
Travis Lusney, Power Advisory LLC

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