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Ministry of Energy  
Renewables and Energy Efficiency  
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Email: [Yvonne.DiTullio@ontario.ca](mailto:Yvonne.DiTullio@ontario.ca)

Dear Mr. DiTullio:

**Re: EBR Posting #011-011-9614  
Conservation First: A Renewed Vision for Conservation in Ontario**

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-OV, Council of Canadians, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Mississippi Riverwatchers, French River Stewardship, as well as many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

ORA would like to congratulate the Liberal government on putting conservation and efficiencies first in energy planning. Conservation will save ratepayers' hard-earned dollars, help lessen the burden on our environment and public health, and reform our electricity system to be more efficient, sustainable and affordable. Conservation creates a win-win situation that serves everyone – as well as the environment.

*“As a result of over a hundred years of low-cost energy, Ontario’s energy consumption per person is amongst the highest in the world. For example, our energy consumption per person is 50% higher than New York State’s and double that of the United Kingdom.”<sup>1</sup> This alone is a strong argument for conservation and efficiencies. Any upward trend in energy demand over the next several years should be addressed through conservation and efficiencies before any new power generation is contracted. Conservation is a winning solution for the consumer, the environment and the electricity system.*

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<sup>1</sup> An Energy Efficiency Strategy For Ontario’s Homes, Buildings and Industries, by Ontario Clean Air Alliance & Ontario Clean Air Alliance Research Inc. - P-IV

**ORA's Recommendations:**

ORA has a focus on healthy rivers, therefore our comments will tend to be weighted more in the area of hydroelectric power generation, but we will do our best to offer input into the questions set out in the *Making Choices* document.

**1. How can the government ensure that conservation is the first resource considered to meet energy needs?**

If this government is truly serious about green energy, then conservation must be supported in the Green Energy Act and Green Economy Act by ensuring that no new generation takes place until all efficiency and conservation measures have been exhausted.

We have a surplus of power which is predicted to continue for several more years, so let's concentrate all our energies and tax dollars for the next 5 years on conservation. If at the end of 5 years we require additional generation then we can address it at that time. In the meantime we will have reaped the economic and environmental benefits of a more efficient, clean and green electricity system.

**2. How can the economic value of conservation be embedded in Ontario's electricity system?**

ORA agrees that the cost and benefit of conservation should be spread over the life of the investment, as is done with investments in supply.

**3. What relative weight should be placed on reduction in demand versus load-shifting from peak demand?**

A focus on reduction in demand should be the top priority.

Load-shifting should not involve incentives to hydroelectric developers to generate power during peak demand hours. This has created a gold-rush mentality that encourages developers to maximize power generation at the expense of the environment and public health and safety. Many older hydroelectric facilities have also started to peak and cycle their plants without an environmental assessment to look at the additional negative impacts to riverine ecosystems. This is not congruent with our focus on green or renewable energy.

**4. What new tools and initiatives will help engage customers in conservation?**

ORA agrees that voluntary dynamic pricing, green button initiatives, social benchmarking, and other innovative approaches and incentives geared towards power consumption efficiencies and reductions would be beneficial to the consumer and the electricity system.

Industrial, corporate and public sector benchmarking, targets and incentives could be publicly recognized and rewarded by government to help increase awareness and efficiencies.

ORA agrees that a net metering program would be the most cost-effective. The

homeowner should first take what is needed for his own requirements before making it available to the grid.

Incentives to purchase household and industrial control, monitoring and efficiency devices should be a foundation of any conservation efforts.

**5. How can conservation awareness and education be improved to drive greater action on conservation?**

Other successful models should first be explored and considered. This could save time and resources, and ensure a more efficient and effective conservation effort.

Recognition, through the media, as well as rewards for successful conservation efforts should be a top priority. This helps raise awareness, and encourages others to look at their own conservation potential for savings.

Tools, apps and devices should be recommended and promoted by the government to address each consumer sectors.

**6. What opportunities should Ontario explore to help consumers finance energy-efficiency improvements?**

On-bill financing at 0% interest would encourage retrofits with strong potential to boost conservation. The province should also explore the revolving fund concept and any other incentives that will accelerate conservation efforts.

**7. Through what means (regulatory and/or voluntary) can electricity and natural gas conservation activities be better coordinated?**

Ontario needs to provide the regulatory framework and incentive programs to ensure conservation is at the forefront.

**8. What innovative programs could help capture conservation potential across key sectors (e.g. residential, commercial and industrial)?**

As mentioned in number 4, innovative technologies and measures resulting in energy efficiencies and conservation should be recognized and rewarded through incentive programs.

**9. Which technology and smart grid innovations do you believe could offer the greatest benefit to you, your community and the system as a whole?**

As mentioned above, household monitoring and management devices and technologies could aid homeowners in reducing consumption and dollars on their electricity bills. The public should be educated on their choices and effective devices should be promoted, and encouraged through incentives.

Research and development of emerging green technologies, such as Liquid Fluoride Thorium Reactors, should be thoroughly explored for their potential in replacing uranium based nuclear.

**10. What role should energy storage play in meeting Ontario's future energy needs and how should it be valued?**

Energy storage is the key to a balanced and effective electricity system. Incentives and programs designed to encourage and reward new storage technologies should be a priority of this government.

Investment and research dollars must go into storage technology before any further expansion of renewable energy projects. Currently we are giving away and wasting too much power generated by high cost green energy projects, so before expansion takes place we must find technologies that will store and balance the power generated to help stabilize and economize the grid. Taxpayers' dollars are being wasted and debt is being incurred by an unstable and wasteful electricity system. So let's not increase the waste – let's cut it back instead. Conservation on all levels is a must.

**11. What are the top needs of residential, commercial and industrial customers?**

Conservation of the environment, efficient use and generation of electricity, and reasonable rates for consumers - these priorities would meet the needs of all sectors. This would be a win-win situation for all concerned.

**12. Are there additional objectives that the government should consider in developing a new framework? If so, what?**

- a. Conservation must be addressed in all forms and all instances. Conservation measures must not only address the conservation of power use, but it must also address the waste of dollars spent on power that is not required, it must address the conservation of the environment, as well as reduced consumption.
- b. Any procurement contract between the government and developer must provide the means to order the shut-down of generation when it is not required. Currently, FIT Contracts awarded to waterpower developers for facilities under 10 MW IC cannot be told to stand down when there is a surplus of power. This is a major waste of taxpayers' dollars.
- c. Transparency and openness are essential in moving forward. The experience with the past has soured many people on the direction the government and our electricity sector has been moving. In the past, green energy proposals have instilled fear instead of pride. Let's focus on building trust through open, transparent and inclusive decision making.

**13. Is there value in targets and, if so, what type (e.g., fixed, dynamic, directional)?**

Targets are essential to the success of any objective. This government should pursue whichever program/s work in the best interests of conservation, cost and energy efficiencies, the consumer, and the environment.

**14. Should government introduce targets for municipalities, hospitals, post-secondary institutions and schools?**

Governments should provide targets for all public sector institutions/organizations as they are funded with taxpayers' dollars.

**15. Should Ontario pursue mandatory energy labelling for commercial/institutional buildings upon sale?**

Not sure what this means.

**16. What can government do to further encourage the sector and the market to deliver on conservation objectives?**

A recognition and reward program would work best.

**17. What should be the roles and responsibilities of LDCs, natural gas distributors, government agencies and the private sector in meeting Ontario's conservation goals?**

It is the role of the government and its agencies to ensure conservation comes first. All government ministries and regulators must work together with synergy to ensure the province's conservation goals are met.

Again, the province must research effective and efficient models in other jurisdictions to better ensure success.

**18. How can province-wide conservation program delivery be streamlined and enable a greater role for LDCs?**

Local Distribution Companies (LDCs) are private corporations that have no place in government decision making, other than a consultation process that is on an equal footing with public consultation. Private corporations are interested in maximizing profits, and not assigned to ensuring the best interests of the public. The best interests of the public are the role and responsibility of the government. Let's not put the fox in charge of the chicken coop as has been done with green energy procurement.

The government should provide the framework for public sector organizations, municipalities and LDCs to work together to find conservation opportunities – this could be done through establishing targets that are supported by policy, legislation and incentives. This will ensure waste is eliminated and that consumers are getting the best value for their dollar.

**19. Considering that conservation can benefit the whole system and/or specific regions, how should it be funded?**

Government loans and grants could be attached to the strength and magnitude of conservation savings.

**20. What conservation measures can be implemented to support regional energy needs?**

Regional energy needs could best be assured through a program where municipal planning is required to set targets, with ongoing monitoring and reviews to ensure their targets are met.

Moving forward, Ontario needs a thoughtful and well researched sustainable energy and conservation plan with input from scientists, non-profit environmental organizations, business, and the public. Ontarians must have a transparent, independent and non-political process in all matters concerning energy planning, procurement and approvals.

ORA recommends that in future when a Ministry is reviewing several pieces of policy at once, that more time be allowed for comment to provide for more thoughtful and constructive feedback.

Placing conservation first will help build support and confidence in this government's plans for a clean and efficient green energy future. The bottom line is that we have a surplus of power, so let's slow down and make environmentally sound decisions. Conservation on all levels is where we must focus all our efforts - everyone benefits and there are no negative impacts. There is a lot more that can be done to decrease our demand for power, which saves the environment, reduces our electricity bills, and makes our system more efficient. Everyone wins with conservation.

ORA is grateful for this opportunity to comment. Please include ORA in any future consultation efforts.

Respectfully,



Linda Heron  
Chair, Ontario Rivers Alliance