**Waste Connections of Canada Response to**

**Proposed Revision to Ontario Energy Board (OEB) Leave to Construct Cost Threshold for Hydrocarbon Pipelines**

**Ministry of Energy, Northern Development and Mines**  
**ERO Number: 019-3041**

**Introduction**

Waste Connections of Canada (WCC) is pleased to respond to the Proposed Revision to Ontario Energy Board (OEB) Leave to Construct Cost Threshold for Hydrocarbon Pipelines. In general, Waste Connections’ is very supportive of this proposal as it currently written.

This regulation will help support Waste Connections corporate initiatives which align with the goals of the provincial government, not only from a red tape perspective, but from a GHG reduction standpoint as well. This proposed change will enable Waste Connections to capture methane from its landfill and convert it to renewable natural gas sooner helping the Province do its part in meeting Canada’s 2050 targets. However, we submit that to realize benefits, it must be enacted as soon as possible.

**Waste Connections of Canada and its Role**

Waste Connections is the premier provider of solid waste collection, transfer, recycling and disposal services in primary and secondary markets across Ontario, Canada and the US, serving millions of customers daily. Whether it is single or multi-family residences, commercial institutions, industrial locations, construction sites or special events, Waste Connections can provide the service.

Waste Connections of Canada is a subsidiary of Waste Connections, which is traded on both the TSX and NYSE, and is the 3rd largest industrial traded company in Canada. In the US we operate in 33 of the 50 states and in Ontario we operate 2 landfill sites and employ over 1300 people.

**Policy Alignment & Acceleration**

Increasing the cost threshold of Section 90 of the Ontario Energy Board Act to $10 million is good practical policy and will unlock numerous energy projects, including renewable projects like Waste Connections of Canada RNG project at its Ridge landfill in Chatham-Kent. Currently our project would require a Leave to Construct application, adding 7-12 months to our project timeline. This is likely longer as it is only an internal OEB performance standard and not legislatively mandated and Covid will likely add more delays. We know that we must seek all other authorizations from applicable ministries, but removing this barrier enables us to shorten the process by nearly a year. We suggest that this regulation change be completed using the most immediate legislative vehicle as our project could very well become the model project for this type of policy development, as it will be brought to market sooner.