

<https://ero.ontario.ca/notice/019-5769>

Melissa Ollevier
Environmental Registry of Ontario
Melissa.Ollevier@ontario.ca

Re: ERO #019-5769

October 4, 2022

Dear Melissa,

The Atmospheric Fund (TAF) appreciates the opportunity to provide feedback on the proposed regulatory amendments to the Emissions Performance Standards (EPS) program. TAF is a regional climate agency based in the Greater Toronto Hamilton Area (GTHA) supporting a net zero future.

In relation to electricity generation using fossil fuels, we support the proposal to strengthen this performance standard from 370 tCO₂e/GWh to 310 tCO₂e/GWh. Regular reductions in the fossil fuel electricity generation standard are essential to the province aligning with the compliance obligations and stringency requirements of the federal OBPS.

However, we recommend that a stringency factor be applied to this performance standard, with regularly scheduled updates to regularly increase the stringency and lower the tCO₂e. This will ensure that Ontario is on track to phase out all conventional fossil fuel electricity generation, in line with the expected Canada-wide Clean Electricity Standard (CES), and will provide more certainty for energy planning and procurement in Ontario.

Additionally, we echo the recommendation of the [OEB's Market Surveillance Panel](#) that **“the IESO should immediately cease reimbursements to gas generators of carbon cost payments.”** The current practice dilutes the price signal sent by the performance standard and undermines efforts to reduce emissions by weakening the incentive to invest in more clean energy infrastructure.

Currently, published data collected through Ontario's Greenhouse Gas Reporting Program (GHGRP) is limited to total emissions, by greenhouse gas and converted to carbon dioxide equivalent, for each facility. This dataset does not disaggregate these emissions by quantification method (QM), emission type (process or combustion), or fuel type. This makes accounting for these emissions in municipal and regional inventories challenging, especially given potential issues around double counting from natural gas combustion which are present in both utility data and the GHGRP dataset. Additionally, and more importantly, without specific details on the source of those emissions, we are unable to identify and accurately quantify potential pathways to economy-wide decarbonization.

We recognize the sensitivities and challenges associated with publishing disaggregate data at the facility level. **We ask that the MOECP publish a secondary data set, consisting of total emissions by emission type (process or combustion) and fuel type (e.g. natural gas, gasoline, etc.), for each sector.** This approach would guard against potential sensitivities associated with facility-level

data while providing municipalities and other practitioners the ability to more accurately account and plan for climate change mitigation efforts.

We strongly urge Ontario to include our recommendations when amending the EPS program.

Sincerely,

Bryan Purcell

VP of Policy & Programs
The Atmospheric Fund