



Office of the Warden

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May 12, 2023

Hon. Todd Smith, Minister
Ministry of Energy
77 Grenville Street
Toronto, ON
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Dear Minister Smith,

Grey County supports the government of Ontario's goal to ensure that the building blocks are in place for an integrated energy plan that meets Ontario's energy needs, while maintaining reliability, affordability, and our clean energy advantage. As a central part of the [Clean Energy Frontier](#), Grey County knows both the environmental and economic importance of the energy sector in the daily lives of Ontarians. The following are comments in response to the province's Environmental Registry of Ontario (ERO) Postings 019-6647 which seek feedback on the findings of the Independent Electricity System Operator's (IESO) Pathways to Decarbonization study.

Regarding permitting, planning and siting new generation and transmission infrastructure (Consultation Questions 1 & 2), Grey County believes that the province should first consider existing nuclear sites as the primary location to invest in new power generation in order to meet the goals and scenarios outlined in the Pathways to Decarbonization report. Ongoing and robust studies have shown that existing nuclear sites have the environmental data and strong safety record to demonstrate they can be tasked with siting new clean generation and storage infrastructure. The use of these existing sites provides an opportunity to streamline not only the processes but the consultation that needs to occur. Areas like Grey County have a high level of citizen engagement, knowledge of the industry and acceptance of large-scale energy projects due to the existing infrastructure that is in place. Furthermore, Indigenous leaders and businesses are actively involved with projects on site and are partners for continued growth of the energy sector. This is demonstrated most clearly in polling conducted by Ipsos in Spring of 2022 that focused on the Clean Energy Frontier region (Bruce, Grey and Huron Counties). The [polling](#) found that 86% of residents familiar with Bruce Power have a favourable opinion of the company while 92% of all residents believe that Bruce Power is involved in the community in a good way. Grey County believes that consulting early and often with the public and key stakeholders is an important part of any large infrastructure project in Ontario. Building on existing relationships between local governments, indigenous communities and the public in nuclear host communities will assist the provincial government to expedite the planning and siting of new nuclear generating facilities in Ontario.

Regarding the development of new clean electricity infrastructure (Consultation Questions 3 & 4), Grey County recognizes the need to meet the increasing demands of Ontarians for clean

electricity. Whatever Ontario decides to build, unprecedented investments in new electricity infrastructure are needed over the next few decades as demand more than doubles by 2050. The grid of the future needs to heat our buildings, power our cars and industry, and meet the needs of Grey County and all Ontarians. Grey County is a clear and visible climate change leader; taking actions to address climate change throughout municipal operations and in the community. By embracing energy conservation, innovative and nature-based solutions, building awareness, and working with residents and businesses, Grey County is creating a more prosperous, sustainable and healthier future that is equitable, accessible and inclusive of urban and rural lifestyles. Grey County has set ambitious, but achievable GHG reduction targets:

- Community GHG emission reductions targets of 15% by 2026, 30% by 2030, 50% by 2035, 60% by 2040, 75% by 2045 and net-zero by 2050
- Corporate GHG emission reduction targets of 20% by 2026, 40% by 2030, 55% by 2035, 70% by 2040 and net-zero by 2045

Grey County's pathway to net-zero as outlined in "[Going Green in Grey](#)" depends on a decarbonized electrical grid. Adopting technologies such as EVs only reduce emissions if they are powered by clean energy. Residential, commercial, and industrial retrofits and new buildings frequently include switching from technologies that consume fossil fuels (such as a gas or oil furnace) to those powered by electricity (such as a ground source heat pump). The cleaner the grid, the more effective these measures will be in reducing our GHG emissions and mitigating climate change. This is particularly important to meet our short-term targets because other mitigation measures, such as tree planting, take time to deliver results. We need immediate and consistent investment in clean energy to meet Grey County's climate action goals.

Several actions in "Going Green in Green" depend on a clean electricity infrastructure to achieve the GHG reduction targets set by County Council. These measures will not be as effective if fossil fuels are still used to power the grid.

Community Actions

- Action 7: Zero-Emission Vehicles Encourage the adoption of electric vehicles.
- Action 11: Green Standards for New Buildings
- Action 12 & 13: Residential and Non-Residential Building Energy Retrofits

Corporate Actions

- Action 1: Energy Efficient New Buildings
- Action 2: Retrofit all existing Grey-owned facilities by 2045
- Action 8: Zero Emission Fleet Vehicle Adoption

We are excited by the opportunity that renewable energy can play in meeting the electricity needs of Ontarians. Both are inexpensive and proven technologies that together made up [75% of new installed capacity globally](#) in 2021. Recently announced [federal refundable tax credits](#) further improve the economic case for renewable energy. Unlike fossil fuels which are sourced out of province, renewable energy infrastructure will create economic development and provide jobs here in Grey County as well as throughout Ontario. Renewable energy employs cost effective technologies that benefit communities, jobs, and public health, and that represent a burgeoning global market. Decarbonization isn't a barrier to affordability – it's the key to an economical, reliable grid.

Regarding investment and innovation in hydrogen capacity (Consultation Question 5), Grey County is a leader in and innovator in hydrogen technology. "Going Green in Grey" includes:

- Community Action 14: Renewable and Emerging Energy Technologies – Support energy innovation and the development of renewable energy.

Provincial investment in hydrogen would leverage the emerging clean energy innovation sector in Grey and Bruce Counties. Existing nuclear facilities rely on developed clusters of innovative companies, who provide a suite of supportive products and services to clean energy. These companies continue to learn and adapt to changing technology that would not only support the expedited construction of new nuclear projects, but the growth of additional energy projects enabled by these sites. Growth of hydrogen and other low-carbon fuels continues to be at the top of this list. There are many examples of businesses in Grey County to support the growth of this type of energy source. We are excited by the opportunity for employment and economic development that would result from investing in hydrogen fuels.

Regarding energy efficiency programs (Consultation Question 6), Grey County is supportive of investments that incentivize energy efficiency. If we can increase the electrical efficiency of current and future buildings and infrastructure, we can electrify our vehicles and buildings without needing to build new capacity. Efficiency programs not only reduce our energy and emissions, but also stimulate the local economy by encouraging residents, businesses, and industry to retrofit buildings and upgrade equipment. Several Actions from "Going Green in Grey" would be catalyzed by provincial investment in energy efficiency. These include:

Community Actions:

- Action 11: Green Standard for New Buildings
- Action 12 & 13: Residential and Non-Residential Building Energy Retrofit
- Action 14: Renewable and Emerging Energy Technologies

Corporate Actions:

- Action 1: Energy Efficient New Buildings
- Action 2: Retrofit all existing Grey-owned facilities by 2045
- Action 3: Residential Demonstration Building
- Action 5: Outdoor Lighting Conversion to LEDs

In conclusion, Grey County recognizes the need to increase the capacity of Ontario's electrical grid. We would like to see investments directed towards new nuclear power on existing sites, proven renewable technology, emerging low-carbon fuels such as hydrogen, as well as programs which incentivize energy efficiency.

Yours truly,

A handwritten signature in black ink, appearing to be a stylized name, possibly "G. Smith", written over a horizontal line.

Brian Milne

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Enclosures

cc. Kim Wingrove, CAO
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