

January 15, 2024

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**Bruce Power Submission**

**Regulatory amendments to clarify program requirements and improve program efficiency for Emissions Performance Standards (EPS) and GHG Reporting Programs**

On behalf of Bruce Power, thank you for the opportunity to discuss our priorities with you in relation to the Ministry of Environment, Conservation and Parks' proposed changes to the Emissions Performance Standards (EPS) and greenhouse gas (GHG) reporting programs to clarify requirements, improve efficiency, address fundamental changes in some Ontario industries, and gradually move some industries from facility-specific standards to sector-based standards.

Nuclear is safe and reliable and we are pleased that is now being globally recognized as a clean energy source that contributes to climate commitments, while helping to improve the health of people around the world. Canada recently signing on, along with more than 20 other nations, to the global agreement to triple global nuclear capacity by 2050 is an incredible recognition of this fact. Bruce Power also [signed on to a similar pledge by industry](#) at COP28 in Dubai. This of course follows on the heels of release of the *Powering Ontario's Growth* plan by the Province, which outlines pre-planning work to potentially add up to 4,800 MW of new nuclear generation capacity at the Bruce site.

Ontario and Canada have taken significant steps in the past year to include large nuclear in key federal tax programs and incentives which we truly appreciate. Specifically, we applaud the Ontario government for implementing a voluntary Clean Energy Credit system in 2023, and Bruce Power is pleased to participate in this. Ontario has already led one of the largest and most successful greenhouse gas and pollution-reduction programs with the phase-out of coal in 2014 and we're poised to be on the cutting edge once again by establishing a protocol for new incremental nuclear power, which will be generated from the existing units, to further decarbonize the province's energy supply mix.

However, more can still be done to level the competitive playing field and could specifically enabled through the EPS program. In July, the Federal Government published its national Greenhouse Gas Offset Credit System and the current protocols covered by the program are extremely limited with no protocol existing for incremental/ new nuclear generation.

In fact, the current slate of federal protocols currently under exploration also do not include provisions for any type of new/incremental carbon free generation. Most notably, the program due to its national coverage means that credits generated in Ontario for example do not necessarily reduce Ontario-based industry emissions and could instead be used to offset GHG emissions in another province instead.

**RECOMMENDATION: Develop Ontario's own offset credits which would encourage innovation while giving regulated facilities lower-cost options and flexibility in how they meet their compliance obligations. Criteria could include the following:**

- **Must avoid, reduce, or remove a definable and measurable amount carbon dioxide equivalent from the atmosphere (tangible)**

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- **Must meet the rules set out in the regulation, including the relevant protocols (credible)**
- **Must be additional and therefore not claim reductions of greenhouse gas emissions that are covered by EPS program, or that have already been credited under some other offset program (additional)**

As a critical first step for Ontario on this path and an international first for the nuclear industry Bruce Power, in collaboration with GHD, has created the [first carbon offset protocol for nuclear generation](#) that calculates the benefit of avoided emissions from non-emitting electricity generation that replaces fossil fuel generation

Bruce Power's Executive Director of Corporate Affairs, Pat Dalzell, announced the offset protocol Dec. 6 as part of the Canadian delegation at the 28<sup>th</sup> Conference of the Parties of the United Nations Framework Convention on Climate Change (COP28) in Dubai with Ministers Khanjin and Smith in attendance.

Carbon offsets represent a certain amount of reduced, avoided or removed carbon dioxide or its equivalent. While these offsets have been used by companies in their decarbonization strategies, this is the first that they'll be used in conjunction with nuclear power generation.

Bruce Power's introduction of the carbon offset protocol for nuclear generation marks a significant milestone in clean energy initiatives. Moreover, the global endorsement of nuclear power's net zero pledge cements the industry's leadership in the clean energy transition. These developments suggest a growing interest in nuclear power across different sectors, unlocking investment opportunities for sustainable energy.

Our experience in clean energy, financial collaborations for its Green Bond program, and active engagement in Ontario's Clean Energy Credit program reinforce the importance of credible, additional, and tangible clean energy credits and carbon offsets.

Nuclear power provides a clean energy alternative to fossil fuel electricity generation while also providing broad impacts to the stability of the connected grid. The focus of the new protocol, which is currently under third-party validation, is to capitalize on clean nuclear generation to meet the increasing demands and allow consumers and business continue to decarbonize through electrification. It is intended to replace fossil-fuel generated electricity and offset carbon-intensive generation through additional incremental output of existing nuclear power generation facilities and potential new nuclear.

### **Next Steps**

With this consultation, Bruce Power asks that the Ontario government review this protocol and use it as a template for a made-in-Ontario carbon offset system that could benefit Ontario companies and keep associated funds in the province.

While Ontario's own system is developed, it is important that clean energy producers in Ontario have the appropriate tools and mechanisms at their disposal to maximize the value of their clean energy production. Presently, the Federal Compendium of Offset protocols does not include one for the generation of net new carbon-free (non-emitting) MW nor has the federal government demonstrated a desire to include such a protocol.

The Ontario government can assist Bruce Power and other energy companies in Ontario in their efforts to support the development of such a protocol by requesting that the federal government implement such a protocol. Doing so would enable the province to use the same or very similar protocol within its own compendium of protocols at such a time when the Ontario Credit System is functioning.

Bruce Power stands ready to move forward with significant investments and work projects to help meet the evolving economic and climate challenges we face, while providing economic recovery opportunities at the same time. Innovations in new nuclear technologies and hydrogen development by using infrastructure investments can drive the economy now and power the world of the future. Bruce Power would be delighted to meet with you and your team to discuss the recommendations of this proposal at your convenience.

**Pat Dalzell**  
**Executive Director, Corporate Affairs**

**Clint Thomas**  
**Director, Government and Stakeholder Relations**