

Sent via email:
BoardSec@ontarioenergyboard.ca

December 5, 2011

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms. Walli,

Re: EB-2011-0242 and EB-2011-0283

I am writing to offer additional comments from the Association of Municipalities of Ontario (AMO) on EB-2011-0242 and EB-2011-0283, submissions from Enbridge Gas Distribution and Union Gas respectively with regards to renewable natural gas.

We would like to re-iterate that AMO supports the drive to make our energy system cleaner, more responsive and more efficient. Specifically, we would like to provide information on how this proposal will assist municipalities in improving resource utilization in landfills and wastewater treatment plants, reduce greenhouse gas emissions, and improve local economic development.

Municipalities across the province are collectors of renewable natural gas in the form of methane which is generated by landfills and waste water treatment plants. However, this resource remains underutilized as most collection is either flared off or inefficiently converted to electricity. AMO supports the submissions since they leverage existing pipeline infrastructure to provide additional incentives to increase collection and improve utilization of methane gas within municipal operations. Renewable natural gas satisfies a triple bottom line approach to better utilizing this methane because it will:

- Lead to greater physical, cultural and financial access and equity in service delivery
- Use fewer natural resources
- Promote and maintain economic development and growth in a sustainable manner.

.../2



In addition, the proposal will serve Ontario's municipalities by reducing greenhouse gas emissions. Municipalities across the province are involved in activities to measure, monitor and reduce greenhouse gasses within their operations despite the lack of a regulatory framework for emission reductions. As methane is known to be 21 times more destructive than carbon dioxide in terms of its climate impacts, the sector welcomes efforts to mitigate its release. Such an initiative also places municipalities in a better position should mechanisms for cap and trade or other greenhouse gas reduction efforts come into force.

Finally, municipalities across the province have embraced the economic development opportunities offered by renewable energy. Many municipalities are actively seeking to attract new businesses and manufacturing facilities to locate within their boundaries. Municipalities also develop, and sometimes partner, in renewable energy projects. The proposal outlined in the submissions will enhance these opportunities by developing a market for renewable natural gas.

AMO is not for or against any one particular type of generation as we believe a broad portfolio of supply options mitigates the risk of dependence on any one fuel supply, and can help reduce risks for the rate base. Encouraging the development of renewable natural gas is good public policy for municipalities because it will improve use of existing methane resources within our landfills and wastewater treatment facilities, reduce greenhouse gas emissions in our operations, and grow our local economies. It is an important and necessary step to a future Ontario that is recognized as a leader in waste management, resource use, and energy creation – all of which will ensure the Province maintains a strong economy and a healthy environment.

Yours truly,

A handwritten signature in black ink, appearing to read 'Gary McNamara', with a long horizontal line extending to the right.

Gary McNamara
President, AMO