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Emailed to TStachowski@epcor.com and uploaded to the OEB Registrar's Office

Mr. Stachowski:

The Ontario Federation of Agriculture (OFA) is the largest voluntary general farm organization in Ontario, proudly representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

We were pleased to learn that EPCOR's Brockton project proposal was successful for the NGE Phase 2. Considering the length of time that has transpired since OFA first wrote you on July 29, 2020, to support the Brockton expansion project, we feel it is important to reaffirm our support.

New rural residential customers will benefit from access to natural gas when larger volume agricultural users are also served under this project. Generally, higher annual volumes can bring projects closer to viability over a shorter timespan. In addition to residential connections, should the Brockton project be completed, natural gas access is possible for the Elmwood area, including poultry operations, small grain drying operations, and an agricultural biogas digester opportunity to consider pipeline Renewable Natural Gas (RNG) pipeline injection.

The Brockton expansion would support agricultural customers in multiple municipalities and Townships. A second distribution line in the region would bring service to grain drying operations and several poultry farms near Glammis, Narva and Pinkerton.

For many years, OFA has championed natural gas access for rural and farm communities. Our messages include:

- Energy is a large expense for rural homes, farms and small businesses. Making natural gas available across the province would free-up \$1 billion in annual energy spending for over 400,000 residents, farms and business owners¹.

¹. Ontario Federation of Agriculture [Rural Ontario Natural Gas Backgrounder](#) January 2018

- Rural communities need a clear and continual commitment from government to support fair and equitable pipeline installations throughout Ontario over an extended timeframe.
- Supporting strategic natural gas expansion sustains economic development, job creation, and an affordable cost of living for rural Ontario.

Secure, reliable, and reasonably priced energy is important to help sustain Ontario's farm sector. For Ontario's food chain to remain competitive, farms need natural gas to heat, cool and ventilate storage and livestock facilities, elevator companies need natural gas to dry grains and oilseeds, and food processors need natural gas to remain local to the farms they rely on.

While we support a cost-effective, reliable and clean electricity system, we encourage government decisionmakers to consider that not all rural businesses, industries and residents will be best served with electric heat pumps or similar devices for their heating, air conditioning and ventilation (HVAC) needs.

OFA views natural gas as an appropriate fit with federal, provincial and municipal sustainability objectives. Natural gas infrastructure expansion has numerous benefits including the development of RNG and low-carbon hydrogen for pipeline injection.

While many initiatives are taking place over the next few years to decarbonize and increase capacity in the electricity system, the Ontario government is also engaging stakeholders on the *Consultation On The Future Of Natural Gas Expansion And Home Heating Affordability*, posted on the Environmental Registry of Ontario as ERO-019-7506.

The Consultation provided OFA the opportunity to review our natural gas messaging and recommendations. OFA provided seven recommendations for the Ministry to consider to best support rural communities:

- *Improve rural project connection rates by allocating of some NGEF funds towards hook-up costs that otherwise discourage potential customers from connecting to existing or new expansions due to their distance from the distributor pipeline.*
- *Adopt Ontario targets for RNG injection into natural gas pipelines.*
- *Use metrics beyond customers/\$ of NGEF support. Consider projects that bring other communities closer to the pipeline grid, thereby increasing their PI and enabling more projects.*
- *Consider the benefits of business customer volumes towards project viability, and the benefits to local community and small business economic development.*
- *Increase awareness about available government/industry subsidies and the ease of accessing incentives when converting a home to natural gas heating from other fuel types.*
- *Continue to support further public investment in natural gas infrastructure. The government has a key role in identifying potential natural gas expansion projects to receive public funding, based on advice from the OEB, project proponents, and the public.*

- *OFA encourages natural gas access proposals to consider farm opportunities along multiple routes to determine optimal routing design to capture business and residential customers.*

The Ontario Federation of Agriculture strongly supports the natural gas access in the Brockton area.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors

