



December 14, 2023

Hon. Todd Smith, Minister  
Ministry of Energy  
77 Grenville Street  
Toronto, ON  
M7A 2C1

Dear Minister Smith,

Bruce county supports the government of Ontario's goal to ensure that the building blocks are in place for the 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](#), Bruce County knows both the environmental and economic importance of the energy sector in the daily lives of Ontarians.

Bruce County was host to a Phase 1 project under the Ontario Natural Gas Expansion Program. This project, delivered by Epcor, was essential to seeing core communities such as Paisley, Kincardine and Lucknow get access to natural gas. These communities continue to see positive growth from both a residential and non-residential perspective, supported by the expansion of these services. As hosts to this project, we believe that we are well suited to provide comments on the ERO posting. The following comments are in response to the province's Environmental Registry of Ontario (ERO) Postings 019-7506 which seeks feedback on the expansion of natural gas in Ontario.

The discussion paper provided poses several questions, the response from Bruce County will specifically address Theme #1 - Performance of NGEP to Date and Theme #4 – Future of Natural Gas Expansion.

### **Theme #1 – Performance of NGEP to Date**

The EPCOR Natural Gas Limited Partnership successfully completed its construction project, which brought a multitude of positive impacts to the communities of Chesley, Paisley, Inverhuron, Tiverton, Kincardine, Lurgan Beach, Point Clark, Ripley, Lucknow, and the Bruce Energy Centre. Approved by the Ontario Energy Board, and supported by the Ontario Natural Gas Expansion Program, the initiative involved the establishment of a natural gas distribution system, featuring a larger diameter mainline serving as the



system's backbone and smaller diameter MDPE distribution piping directly catering to homes and businesses within each community. The completed project has not only provided significant employment opportunities, engaging up to 150 workers at its peak but has also demonstrated a commitment to continuous engagement with stakeholders and communities. As a result of this enhanced energy infrastructure, future development in both residential and non-residential sectors has benefitted. The availability of natural gas is expected to spur economic growth, attract businesses, and contribute to the overall well-being and sustainability of the communities involved. This program has been essential to ensuring that these communities have opportunities given the size of systems required to connect rural communities and the lack of density of users. Creating a Phase 3 would support further growth in getting available lands for residential and non-residential users in rural areas.

## **Theme #2 – Future of Natural Gas Expansion**

In the last decade, Bruce County, has undergone substantial growth. The municipalities in the region have missed out on lucrative investment opportunities due to persistent delays in extending natural gas to vital development sites. In response to this issue, the Western Ontario Wardens' Caucus (WOWC) advocates for a crucial update to the Leave to Construct (LTC) cost threshold for hydrocarbon transmission facilities within Ontario. Currently fixed at \$2 million since 1998, the proposed amendment to Ontario Regulation O.Reg.328/03 suggests raising the threshold to \$10 million, aligning the province more closely with other Canadian jurisdictions. This proposed adjustment aims to alleviate regulatory burdens, streamline economic development processes, and enhance Ontario's competitiveness in attracting vital investments.

The \$2 million threshold no longer resonates with the current landscape, leading to virtually all gas pipeline projects surpassing this limit. This has manifested in lost opportunities for Bruce County, including potential expansion plans of existing users. To adapt to the evolving economic and regulatory environment, the Bruce County would support the modernization of



these regulations to foster future development. Bruce County's endorsement of an increase in the LTC threshold to \$10 million reflects a strategic move aimed at promoting economic growth and job creation.

At the core of the Clean Energy Frontier, Bruce County is an advocate for a transition to net zero. Companies and organizations in our region are heavily investing in research and production of low carbon fuels and clean hydrogen. As we envision a sustainable and net-zero future, it is imperative to ensure that any new natural gas distribution systems are future-proofed, aligning with the transition towards a greener energy landscape. With reports such as *Pathways to Decarbonization*, the next iteration of the NGEF should include forward-thinking strategies that go beyond traditional approaches. Incorporating cutting-edge technologies such as low carbon fuel blending is paramount. By integrating these innovations into the design and implementation of the natural gas distribution infrastructure, Bruce County not only positions itself as a leader in environmental stewardship but also creates a foundation that seamlessly accommodates the shift towards net-zero emissions. This foresighted approach ensures that the energy infrastructure remains adaptable and responsive to emerging technologies, providing a sustainable and resilient framework for the county's journey toward a more environmentally conscious future.

Finally, active involvement of municipalities in identifying and supporting potential expansion opportunities, as well as providing support for applications from companies, plays a pivotal role in fostering sustainable economic growth and community development. Municipalities, as local stewards, possess an intimate understanding of their regions, enabling them to identify areas where external investments can be strategically channeled for the benefit of the community. This collaborative approach not only attracts external businesses seeking to invest in the community but also ensures that expansion aligns with the local vision, values, and sustainable development goals.



### **Summary**

Bruce County strongly supports the Ontario government's commitment to an integrated energy plan that meets the province's needs while emphasizing reliability, affordability, and clean energy. As a key player in the Clean Energy Frontier, Bruce County recognizes the environmental and economic significance of the energy sector in Ontarians' daily lives. The County, having hosted a Phase 1 project, supports the development of Phase 3 under the NGEF. Bruce County emphasizes the need for a forward-thinking approach in the next iteration of NGEF, incorporating cutting-edge technologies for a sustainable and resilient energy future. The county also stresses the importance of active municipal involvement in identifying expansion opportunities to foster sustainable economic growth and community development.

Most sincerely,

Chris Peabody  
Warden  
County of Bruce