



CANADIAN COUNCIL ON  
RENEWABLE ELECTRICITY  
CONSEIL CANADIEN SUR  
L'ÉLECTRICITÉ RENOUVELABLE

August 26, 2019

Paola Mellow, Executive Director, Clean Fuel Standard, Environment & Climate Change Canada (ECCC)

Transmitted electronically to: ec.cfsncp.ec@canada.ca

Dear Ms Mellow,

**RE: Clean Fuel Standard (CFS) Proposed Regulatory Approach**

The Canadian Council on Renewable Electricity (CanCORE) represents the aligned interests of the four national trade associations for the renewable electricity sectors that are responsible for 68% of Canada's total annual electricity production: WaterPower Canada (WPC); the Canadian Wind Energy Association (CanWEA); the Canadian Solar Industries Association (CanSIA); and Marine Renewables Canada (MRC).

A central element of the Pan-Canadian Framework, is reducing the emissions intensity of our electricity supply, and fuel-switching from fossil fuels to clean electricity in the transport, buildings & industry sectors ("electrification"). CanCORE continues to advocate that the Federal Government: commit to a 100% non-emitting electricity grid; and create a strategy for electricity to become the single largest energy source, in Canada by 2050. The Government of Canada has committed to put Canada on a pathway to achieve 90% of electricity generation from non-emitting sources by 2030, and according to ECCC's "Canada's Long-Term Low Greenhouse Gas Development Strategy", non-emitting electricity production must approximately triple from 2019 to 2050 to support electrification and meet our long-term emissions reduction targets.

CanCORE welcomes the elements of the proposed CFS regulatory approach that will accelerate energy end-use electrification through fuel-switching from liquid, solid and gaseous fossil fuels to renewable electricity. These elements are aligned with the Pan-Canadian Framework and the CFS objective therein to achieve 30 Mt of annual reductions in greenhouse gas emissions by 2030 by reducing the lifecycle carbon intensity of fuels and energy used in Canada.

CanCORE are concerned about the proposal to make OEM's the default credit creator for residential electric vehicle charging and will be submitting specific comments on the compliance credit approach for electric vehicle charging to the Technical Working Group. Please do not hesitate to reach out should you wish to be provided with further information.

Very best regards,

Wes Johnston, President & CEO, CanSIA

Elisa Obermann, Executive Director, MRC

Robert Hornung, President, CanWEA

Anne-Raphaëlle Audouin, President, WPC



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