



Canadian Solar Industries Association
L'Association des Industries Solaires du Canada
150 Isabella St., Suite 605
Ottawa, Ontario
CANADA K1S 1V7

T • 1 (613) 736-9077
1 (866) 522-6742
F • 1 (613) 736-8938
E • info@cansia.ca

CanSIA

www.cansia.ca

Mr. Eric Loi
Senior Engineer
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Air Policy Instruments and Programs Design Branch
77 Wellesley Street West, Floor 10, Ferguson Block
Toronto, Ontario M7A2T5

Dear Mr. Loi,

Thank you for the opportunity to provide feedback to the Ministry of the Environment and Climate Change (MOECC) regarding your proposed amendments to O.Reg. 452/09 on greenhouse gas emission reporting thresholds and reporting sectors.

CanSIA is a national trade association that represents the solar energy industry throughout Canada. CanSIA's vision for Canada's solar energy industry is for solar electricity to be a mainstream energy source and an integral part of Canada's diversified electricity mix. In order to accomplish this goal, supportive policy and regulatory frameworks must be in place. One of these frameworks is a strong climate policy that takes into account emissions from electricity generation and natural gas use in Ontario.

In the 2015 Climate Change Discussion Paper a number of areas where emission reductions could be targeted are highlighted including: the electricity, transportation, industrial and building sectors. Cooperation with other government ministries including the Ministry of Energy (MOE), Ministry of Transportation (MTO), Ministry of Economic Development, Employment and Infrastructure (MEDEI), and the Ministry of Municipal Affairs and Housing (MMAH) is necessary to craft policy and regulations which will enable reductions in each of these areas. CanSIA believes that the MOECC's proposed amendments to O.Reg. 452/09 are an excellent first step in ensuring the carbon emissions from various feed-ins to these sectors are accounted for, reported on and eventually capped.

Emissions Reporting Threshold

CanSIA supports the MOECC's proposed amendments to O.Reg. 452/09 including the expansion of reporting sources of emissions and the lowering of the reporting threshold from 25,000 tonnes of carbon dioxide equivalent (CO₂e) to 10,000 tonnes of CO₂e. Harmonizing the reporting threshold with California and Quebec at 10,000 tonnes of CO₂e is prudent. CanSIA also supports requiring third party verification of emissions at the 25,000 tonnes of CO₂e threshold. Ontario should continue to set requirements for reporting and compliance at levels that are similar to/harmonized with those of California and Quebec, moving forward.



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CanSIA supports the MOECC's proposal to not include a reporting threshold for electricity importers. Ensuring that all electricity importers are required to third party verify their emissions reports is also supported as this will help to prevent carbon leakage across different jurisdictions and contribute to a more accurate costing of emissions intensive electricity generation.

Capped and Non-Capped Emissions Categories

Currently, O.Reg. 452/09 includes emissions from electricity generation and cogeneration. This category of emissions sources should remain within the amended regulation to ensure that emissions from natural gas generation are subject to both the requirement to report emissions above 10,000 tonnes of CO₂e, and eventually to participate in the cap and trade mechanism if an entity's emissions are above 25,000 tonnes of CO₂e.

The MOECC has identified that electricity imports would also be subject to reporting requirements under the amended regulation and that no threshold parameters would be included in this requirement (i.e. regardless of the quantity of electricity imported or the emissions of those imports, all electricity importers would be required to report under the regulation). CanSIA is supportive of this proposed amendment.

CanSIA supports all other proposed additions to the categories of reporting sources of emissions including:

- Equipment used for natural gas transmission, distribution and storage (NGTDS)
- Distributors of natural gas
- Petroleum product suppliers
- Electricity transmission and distribution
- Magnesium production
- Mobile equipment at facilities

Once again thank you for the opportunity to comment on the proposed amendments. We look forward to continuing the dialogue with the MOECC following the release of the Climate Action Plan and Strategy and cap and trade regulations.

Yours sincerely,

John Arthur Gorman
President, Canadian Solar Industries Association