



Nancy Marconi
Registrar
Ontario Energy Board
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Toronto, Ontario M4P 1E4

May 17, 2022

Clean Air Council Input to the Ontario Energy Board on Ontario Power Generation Clean Energy Credits

Dear Ms. Marconi,

The [Clean Air Council](#) (CAC) is a network of over 35 Ontario municipalities working collaboratively on clean air and climate change actions. [Clean Air Partnership](#) (CAP), a charitable environmental organization, facilitates the CAC network. The below request and input represent the consensus request from the municipal staff member representatives of CAC member municipalities ^[1].

The Clean Air Council would like to request that the Ontario Energy Board (OEB) consider issues related to the Ontario Power Generation sales of clean energy credits arising from OEB rate regulated assets. It has been extremely challenging to access background information on what credits were sold, when they were sold, who they were sold to and how much they were sold for. These credits were paid for by the Ontario rate base and the lack of transparency related to the sale of clean energy credits is very concerning. Information related to these credits should be available to all Ontarians.

In addition, there are concerns related to double counting. From our understanding the GHG clean energy credits were applied to the Provincial and municipal 2020 targets. If these credits were sold, then they would not be available to the Province or Ontario municipalities as GHG reductions. Therefore, the status of the sale of those credits will affect the GHG intensity coefficient that all Ontario municipalities use in their GHG inventories. It appears OPG has only been selling credits related to the rate-regulated assets. OPG doesn't seem to be selling clean energy credits from its unregulated assets under contract to the IESO as the IESO prohibits doing so in its contracts.

This request is different from the clean energy credit market effort the IESO is undertaking. That is a separate process, and the CAC is not asking for the OEB to address that effort in this letter. Though it is critical that transparency be a key value that guides that process as well.

We sincerely hope that the OEB will consider this important issue and report back to the Clean Air Council network on its findings. It is also important to ensure that any future clean energy credit sales from OPG (should they occur) need to be open and transparent and on the public record. This lack of transparency related to the sale of past credits is extremely concerning. These credits are paid for by the Ontario rate base and technically belong to Ontarians. These credits need to be applied towards GHG reductions made by the Province and Ontario municipalities and should not be sold by OPG especially with the present lack of public accountability and transparency.

We look forward to hearing back from the OEB on findings and future decisions related to OPG sales of Clean Energy Credits. If you have any questions for the Clean Air Council, Clean Air Partnership is available to facilitate these discussions. Please contact Gabriella Kalapos at gkalapos@cleanairpartnership.org.

[1] Municipal staff representatives on the Clean Air Council (CAC) were consulted in the preparation of this submission to reflect the feedback of member municipalities but direct endorsement of this submission by municipal councils was not sought. CAC representatives are the municipal change agents within leading climate action municipalities and have been working collaboratively across the region for the last 20 years to support and enable progress on clean air and climate change actions. The consultation undertaken were facilitated and are endorsed by the Clean Air Partnership, a charitable environmental organization that serves as the secretariat for the Clean Air Council.