



The Honourable Steven Guilbeault  
Minister of Environment and Climate Change  
Ottawa, Ontario

April 14, 2022

Dear Minister Guilbeault,

Thank you for the opportunity to comment on the proposed clean electricity standard. The Green Party of Canada is pleased that the federal government has acknowledged the importance of developing such a standard. The discussion paper, “A Clean Electricity Standard in support of a net-zero electricity sector,” does not go far enough in setting a realistic plan to reach carbon neutrality, and the timeline to achieve this transition falls short of globally established targets.

Ahead of addressing the key questions outlined in the discussion paper, which are reductionist, defeatist, and assume that governments only have the power to fiddle at the margins of the status quo, we would like to set out an alternative approach which is more likely to lead to positive results.

Canada has had a long-standing pattern of distributing electricity through large, centralized, provincially regulated – and often provincially owned – monopolistic power producers, which transmit electricity over long distribution networks. This is a supply-driven model.

For decades, self-interested utilities have operated in opposition to independent power producers and demand-side management. With inexpensive local power generation, storage, distribution, and load buffering, it is no longer good public policy to allow a monopoly on electricity generation.

Given the urgency of the climate crisis, it is worth considering that old structures and models may no longer be fit for long-term, sustainable generation purposes. Perhaps, we must consider replicating cooperative efforts between provinces, such as the Atlantic Loop. Let us consider, for example, how these efforts may be replicated between Ontario Hydro and Manitoba Hydro.

Federal leadership is needed to move rigid structures towards greater cooperation across Canada. It is time to question our assumptions that lead us to believe that these structures, and their inherent barriers, are immovable.

To meet the urgency of the climate crisis and the imperative to hold global average temperature increase to no more than 1.5 degrees C above pre-industrial levels, we must not assume that our only available steps are incremental and that the status quo is cast in stone.

It is revealing that the clean electricity standard discussion paper begins in its introduction by erasing the 1.5 degree C target. If the 1.5 degree C target had not been mentioned in the title of the IPCC report, it would not have been mentioned in this paper at all. The more comfortable target of net zero by 2050 dominates. But without deep, transformative, and radical reductions in greenhouse gas emissions by 2030, net zero by 2050 is irrelevant.

The challenge of holding warming to 1.5 degrees C requires one hundred percent renewable green electricity by 2030. The 2035 target must be adjusted, as it is too weak to meet this challenge. To reach that goal, we must eliminate any obstructions that governments, at multiple levels, have created.

We must design the solution we need and then remove the obstacles from its implementation.

### **Decarbonize Electricity and Connect All Regions by 2030**

To decarbonize electricity, we must establish a robust, interprovincial/interterritorial electricity grid across Canada. This electricity grid must connect all regions, provinces, and territories, and allow for storage and flexibility in wheeling renewably sourced electricity from one place to another, including internationally. It is key that provincial utilities across Canada be connected with storage and load buffering.

By 2030, we must green the grid by removing all fossil fuel generation from Canada's national east-west electricity grid. Replacing coal with natural gas is not decarbonizing. Natural gas must be removed from the grid. We must modernize by rebuilding and revamping the east-west electricity grid to ensure that renewable energy can be transmitted from one region to another. Many key inter-provincial links have been impeded by a lack of inter-ties.

Traditionally, provincial monopolistic utilities have preferred building links and business relationships with neighbours in the United States. To facilitate a national electricity grid, negotiations are required between each provincial utility and the federal government. We must immediately begin bilateral negotiations and funds for upgrading and expanding the grid.

As long ago as 2002, the North American Commission for Environmental Cooperation led a tri-national process to promote regional cooperation across national borders to expand access to renewable electricity.<sup>1</sup> It is astonishing that so little progress has been made. Within Canada, we face significant gaps in the grid. The modernized grid is the key to decarbonizing electricity and beyond that, decarbonizing transportation and ultimately our economy. The grid becomes storage for excess wind, geothermal, tidal, run-of-the-river hydro, and solar.

There are examples to inspire us. Denmark's excess wind energy is sold to Norway, where it is used immediately as needed but stored through the elegant and simple technology of "pumped storage". If international partners are successfully using grid sharing to store electricity, why can't Canada?

---

<sup>1</sup> "Environmental Challenges and Opportunities of the Evolving North American Electricity Market." Published June 2002. Accessed April 1, 2022. Retrieved at <http://www.cec.org/files/documents/publications/959-environmental-challenges-and-opportunities-evolving-north-american-electricity-en.pdf>.

In the process of re-imagining our production of electricity, we need to democratize energy. For example, homeowners and businesses that have installed renewable energy technologies should have access to the increased benefit of selling excess energy into the grid. This energy can then be drawn upon later if energy production falls short. Examples from the Federation of Canadian Municipalities' climate caucus could offer guidance. Chester, Nova Scotia makes money for the community from its windmill. Nelson, BC has its own utility, Nelson Hydro, operating a solar garden throughout the small community.

The Intergovernmental Panel on Climate Change (IPCC) Working Group III's latest climate report, "Climate Change 2022: Mitigation of Climate Change: Summary for Policymakers," outlines that:

*"Electricity systems powered predominantly by renewables are becoming increasingly viable. Electricity systems in some countries and regions are already predominantly powered by renewables. It will be more challenging to supply the entire energy system with renewable energy. Even though operational, technological, economic, regulatory, and social challenges remain, a variety of systemic solutions to accommodate large shares of renewables in the energy system have emerged. A broad portfolio of options such as, integrating systems, coupling sectors, energy storage, smart grids, demand side management, sustainable biofuels, electrolytic hydrogen and derivatives, and others will ultimately be needed to accommodate large shares of renewables in energy systems. (high confidence)."*<sup>2</sup>

### **Invest in Clean Technologies that Produce Maximum Benefit**

The federal government must ensure that technologies receiving government support meet clear criteria for future benefit. All emission reduction efforts receiving public dollars must be developed to maximize greenhouse gas reductions at lowest costs, while enhancing employment benefits with the lowest possible transactional costs and delays. Using such criteria eliminates any new nuclear plants, small modular reactors (SMRs), or mega dams from consideration, given current technologies and the reality of enormous costs for little return.

Any delays in switching to renewable energy sources, while sustaining and expanding fossil fuel infrastructure, will make the inevitable future transition more expensive, complicated, and politically challenging.

At the provincial level, it is deeply concerning to observe the prospect of re-carbonizing Ontario's electricity grid. Doug Ford's government has worked to dismantle Ontario's climate-change mitigation progress by canceling renewable energy projects and investing in gas-powered plants. We support Ottawa Council and several Ontario municipalities, representing 60 per cent of the province's population, in their formal call on the Ontario government to phase out natural gas-powered electricity generation by 2030. Notably, the City of Kitchener was the first municipality to have endorsed gas power phase-out.

---

<sup>2</sup> Intergovernmental Panel on Climate Change, "Climate Change 2022: Mitigation of Climate Change: Summary for Policy Makers". April 2022. Footnote 55, C.4.3, SPM-36. Accessed [https://report.ipcc.ch/ar6wg3/pdf/IPCC\\_AR6\\_WGIII\\_SummaryForPolicymakers.pdf](https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_SummaryForPolicymakers.pdf).

## **Ending Canada's Reliance on Non-Renewable Energy**

Canada has the opportunity – as a fossil fuel dependent country – to set an example of planning and successfully executing the end of our dependence on fossil fuels. We must end fossil fuel subsidies. Federal spending to build and expand fossil fuel infrastructure must cease immediately. Any fossil fuel project undertaken in violation of Section 35 of the Constitution and/or in violation of the United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP) must be cancelled. This includes the Trans Mountain Pipeline. By 2030, we must shift all Canadian bitumen from fuel to feedstock for the petrochemical industry.

When it comes to fossil fuel exploration and development outside of Canada, no further permits should be issued. Promoting the development of local, small-scale bio-diesel production is good policy. We must mandate a switch to bio-diesel for fishing, forestry, and agricultural equipment.

## **Just Transition for Fossil Fuel Workers**

It is time for the federal government to introduce just transition legislation. The recommendations of the government-commissioned “Taskforce on Just Transition for Canadian Coal Power Workers and Communities” were tabled in December 2018. It is urgent that these recommendations be honoured and expanded to all fossil fuel workers and communities.

We must decommission and/or repurpose existing oil and gas infrastructure and shift workers with transferable skills to well-paid jobs in the green economy. These initiatives, as well as efforts to remediate environmental damage will provide jobs for existing workers currently employed in the oil and gas sector. Many more will be employed for retrofitting buildings.

## **Pan-Canadian Grid Council**

The Pan-Canadian Grid Council must be composed exclusively of people from backgrounds and sectors that want the project to succeed. This includes renewable energy experts, renewable energy producers, and independent energy policy experts, such as Ralph Torrie.

In addition, international expertise should be sought after, such as expertise from William Moomaw, Professor Emeritus of International Environmental Policy at Tufts University, or Saul Griffith, Australian inventor and author of *“Electrify: An Optimist's Playbook for Our Clean Energy Future.”*

Indigenous leadership is essential. We must seek wisdom and input from leaders such as Chief Gordon Planes of the T'Sou-ke First Nation and Chief Patrick Michell of Kanaka Bar. Chris Henderson of Indigenous Clean Energy, a strong partner in work with First Nations, would be a great choice.

## **Environmental Justice for All Canadians**

Canada's transition to clean electricity must not come at the expense of the protection and prosperity of Black, Indigenous, and racialized people. Undeniable, non-renewable energy sources are a leading cause of environmental injustice, whereby Black, Indigenous, and racialized people

are being faced with the lack of regard for their communities, a lack of inclusion within decision-making processes, and the constant threat of violence. However, a growing body of research is documenting the impact of green technology development on Black, Indigenous, and racialized communities globally, citing a concerning rise of human rights violations, displacement, and violence in the field of renewable energy.

As Canada establishes a clean electricity standard, environmental justice for all must be a top priority. The federal government must consult and cooperate in good faith with Indigenous peoples to obtain free and informed consent prior to the approval of projects affecting their lands, territories, and resources, as outlined in Article 32 of UNDRIP. Meaningful engagement that is consistent with UNDRIP must be prioritized to maximize economic development opportunities in nature-based climate solutions, and the deployment of renewable energy, where consent is given.

High transmission links from western Ontario to Eastern Manitoba will be particularly difficult and will require substantial construction on Indigenous lands, with major potential impacts on nature. The area includes sensitive boreal forest ecosystems and important hunting and fishing areas protected by treaty.

Indigenous nations must be engaged immediately to ensure the route through the boreal is guided by traditional Indigenous knowledge, respecting sovereignty, and treaties. There is no time to waste in beginning meaningful consultation to have a completed national renewable electricity corridor by 2030.

Large scale storage of electricity must be pursued in partnership with Indigenous peoples, taking advantage of any abandoned quarries, pits, or existing reservoirs at elevation to provide pumped storage. Currently, there are nearly two hundred Indigenous-led projects producing renewable electricity across Canada. Indigenous leadership is needed in the effort to decarbonize electricity.

Thank you again for the opportunity to comment.

Sincerely,

Dr. Amita Kuttner  
Interim Leader of the Green Party of Canada



Elizabeth May, O.C.  
Member of Parliament, Saanich – Gulf Islands

Mike Morrice  
Member of Parliament, Kitchener Centre



Karen Farley  
Green Party of Canada Shadow Cabinet Critic for Innovation

Dr. Devyani Singh  
Green Party of Canada Shadow Cabinet Critic for Green Recovery