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The Honourable Glenn Thibeault
MPP Sudbury
Minister of Energy
Ministry of Energy
900 Bay Street, 4th Floor
Hearst Block
Toronto ON M7A 2E1

RE: Supporting Municipal Energy and Climate Planning Through Data Accessibility

Dear Minister Thibeault,

The Province of Ontario's Climate Change Action Plan rightly places a high priority on supporting and enabling municipalities in promoting, facilitating and achieving climate change mitigation. This includes a strong emphasis on the creation and strengthening of municipal energy plans, climate action plans, and greenhouse gas (GHG) inventories. This is further reflected in provincial funding programs (e.g. the MOE's Municipal Energy Plan program), and legislation (e.g. the Growth Plan for the Greater Golden Horseshoe). Despite these commendable initiatives, however, many municipalities still struggle to access the basic energy consumption data required to develop and update energy/climate plans and GHG inventories.

To address this problem, *we respectfully request that you direct the Ontario Energy Board to amend its Reporting and Record keeping Requirements (RRR) to include municipal-level energy consumption data.*

Ontario utilities are already required to report total annual electricity and natural gas consumption, aggregated by their distribution area, through OEB's reporting and record keeping requirements (RRR). These data are publicly available on the OEB's website. However, numerous distributors' distribution areas span multiple municipalities (particularly natural gas distributors as there are only three), so their reported volumes are not useful for creating municipal energy/climate plans and GHG inventories.

By having regular access to reliable city-specific energy consumption data, municipalities can regularly produce local GHG inventories and develop strategic, effective climate action plans, community energy plans, and policies and programs that address their specific situations. While some cities are able to access these data from their electric and gas

utilities, many communities report ongoing challenges accessing these data, ranging from extensive delays to complete inability to access the data. According to a survey TAF conducted of municipalities in the Greater Toronto and Hamilton Area (GTHA), ***data access is single largest barrier to development/updating of local GHG inventories, with 85% of cities reporting data access challenges.***

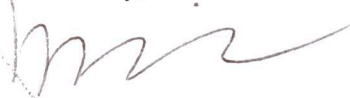
Furthermore, cities are not the only stakeholders interested in using community energy data to support climate change action. Academic researchers and non-governmental organizations are increasingly involved in community-level climate change action planning and research. These efforts are also frustrated by data access challenges. For example, TAF is developing a GHG inventory for the GTHA, in support of our new regional mandate, and has thus far been unable to access all of the required energy consumption data.

Since the data would be publicly accessible on the OEB website, other stakeholders, and the general public, would also be provided with reliable access to community energy data. This would also simplify the process for distributors; rather than fielding inquiries from multiple cities and stakeholders every year, they could simply direct all parties to the publicly accessible OEB Yearbooks.

There is no privacy concern whatsoever around the publication of these values since they would be aggregated on a municipal level. There is no way to calculate or infer anything about the energy consumption of any individual household or business based on annual, aggregated, municipal-level data.

The transition to a low carbon economy will require all actors to have access to high quality data to support informed decision making. In particular, municipalities, stakeholders, and the general public should have open access to community level energy consumption data. ***We therefore urge you to direct the OEB to enhance the RRR to include municipal level energy consumption volumes.***

Sincerely,



Julia Langer
Chief Executive Officer
The Atmospheric Fund