Dear Ministers,

Concerns About Ontario's Natural Gas Expansion Program (NGEP) previously ERO 025-0923

The Natural Gas Expansion Program (NGEP), launched in 2018, helps extend gas pipelines to rural, northern, and Indigenous communities where it is too costly for companies to build on their own. The program is funded through a $1/month charge on all natural gas customers in Ontario.

The government frames natural gas as "critical" for Ontario's economy and electricity system, and as part of a "gradual transition" toward a mixed energy supply. There is no timeline for phasing down natural gas and similar investments don't appear to be connecting renewable energy to the grid.

Where This Falls Short:

1. Locks in Fossil Fuel Use for Decades

New pipelines and infrastructure will last well beyond 2050, locking communities into fossil fuel use and conflicting with Canada's net-zero commitments.

2. No Emissions Accountability

The program does not require measurement or disclosure of greenhouse gas emissions from increased gas use or from methane leaks — a potent driver of climate change.

3. Ignores Low-Carbon Alternatives

Funding is tied only to natural gas, leaving out renewable options such as geothermal, biomass, district energy, or solar. This risks steering communities away from cleaner, long-term solutions.

4. Short-Term Savings, Long-Term Costs

While natural gas may cut heating bills today, future carbon pricing and climate rules could raise costs. Communities could be left with stranded infrastructure and expensive conversion needs.

5. Vague Transition Without a Plan

Calling natural gas a "transition fuel" without deadlines or targets leaves the transition open-ended and undermines Ontario's climate goals.

6. Limited Community Voice

The program does not fully reflect Indigenous or local preferences for energy systems. Communities may want solutions aligned with cultural values and climate resilience, not just fossil gas and so what other alternatives have been evaluated to compare to this investment? .

7. Mitigation of Environmental Impacts is Not Assured

With the introduction of 'Protect Ontario by Unleashing our Economy Act', assurances of comprehensive environmental impacts and effective community consultation are no longer required and therefore mitigation of Environmental Impacts is lacking.

Recommendations for a Better Path Forward

Ontarians deserve affordable energy that also secures a safe climate future. NGEP should:

- **Measure and disclose emissions** from all expansion projects, including methane leaks.
- **Support renewable heating options** such as geothermal, district energy, biomass, and solar, giving communities real choices beyond fossil fuels.
- **Prioritize efficiency programs** that lower energy use and bills without locking in new fossil fuel systems.
- **Develop a clear, staged timeline** for reducing natural gas use, aligned with Canada's net-zero commitments.
- **Ensure meaningful consultation** with Indigenous communities and municipalities to reflect diverse needs and values.
- **Invest in training and jobs** that prepare workers and youth for careers in clean energy, ensuring long-term economic benefits.
- **Integrate NGEP with Ontario's climate and energy strategy**, linking it to electricity grid planning, electrification, and climate resilience.

Conclusion

The Office of the Auditor General of Ontario's 2020 audit titled **Reducing Greenhouse Gas Emissions from Energy Use in Buildings** highlights that fossil-fuel energy use accounts for approximately 77% of Ontario's greenhouse gas emissions. It emphasizes the need for a comprehensive long-term energy plan that addresses not only electricity but also other fuels, such as natural gas, to effectively reduce emissions. These findings align with concerns raised about the implications of expanding natural gas infrastructure without adequate climate considerations.

NGEP lowers bills today but risks burdening households and communities tomorrow. Instead of locking Ontarians into more fossil fuels, this program should invest in clean energy solutions that cut costs, respect local choices, create jobs, and align with climate action. For these reasons, I urge you to revise the NGEP in its current form and support amendments being made to the expansion proposal.

Sincerely,