



ONTARIO
CLEAN AIR
ALLIANCE

July 11, 2022

By Email: hydrogen-hydrogene@iaac-aeic.gc.ca

Hydrogen Ready Power Plant Project
Impact Assessment Agency of Canada
600- 55 York Street
Toronto M5J 1R7

Dear Impact Assessment Agency of Canada:

Re: Eastern Power's request for permission to build a 600-megawatt gas-fired power plant near Sarnia

To support Premier Ford's plan to increase Ontario's gas-fired electricity generation by more than 600% by 2040, Eastern Power is seeking a 20-year contract from Ontario's Independent Electricity System Operator to build a **new** 600-megawatt (MW) gas-fired power plant near Sarnia.

In an attempt to justify its proposed new power plant, Eastern Power states that it will be a dual fuel facility which will also be able to operate on a blend of gas and hydrogen as hydrogen becomes available.

But Eastern Power fails to note the following two key facts about hydrogen.

First, 96% of the world's hydrogen is produced by fossil fuels.

Second, [the greenhouse gas emissions of a fossil hydrogen power plant are even greater than those of a gas-fired power plant.](#)

That is, hydrogen power plants are only climate friendly if their hydrogen is produced by zero emissions renewable energy. But Eastern Power has made no commitment to use green hydrogen to fuel its proposed power plant.

Eastern Power's proposed new gas-fired power plant is not in the public interest for the following reasons.

First, it is not consistent with a least-cost plan to reduce Canada's greenhouse gas pollution by 40 to 45% by 2030 and it is not consistent with a least-cost plan for Canada to achieve net zero greenhouse gas pollution by 2050.

Second, it is not consistent with a least-cost plan to achieve a net zero-carbon electricity grid for Canada by 2035, which is a key element of the Government of Canada's plan to achieve its Paris climate commitments.

Third, it is not consistent with the request of more than [60 non-governmental organizations](#), including the Registered Nurses' Association of Ontario and the Canadian Association of Physicians for the Environment, that gas-fired power be phased-out in Ontario by 2030.

Fourth, it is not consistent with the requests of [33 Ontario municipalities](#), which represent almost 60% of Ontario's population, for the phase-out of gas-fired power.

Fortunately, Ontario has many better options to keep its lights on. Specifically, by investing in energy efficiency, demand response, wind and solar energy, energy storage and by purchasing renewable electricity and storage services from Hydro Quebec, [Ontario can move to a zero-carbon electricity grid by 2030 and lower electricity bills](#).

Recommendations

1. The Government of Canada should deny Eastern Power's request for permission to build a new 600 MW gas-fired power plant near Sarnia.
2. Any approval of a new hydrogen gas-fired power plant in Ontario should be conditional on the power plant being fueled 100% by green hydrogen that is produced by renewable energy resources.

Yours truly,

<Original signed by>

Jack Gibbons
Chair