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January 30, 2017

**Re: Draft regulation establishing the Ontario Climate Change Solutions Deployment Corporation under the Development Corporations Act, EBR Registry Number: 012-9270**

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Dear Ms. Zwick,

Please accept the following submission regarding EBR Notice 12-9270.

CELA welcomes the inclusion of residential buildings with low-income residents as one of the sources of greenhouse gas emissions the corporation seeks to address.

The objectives of the corporation, described in subsection 3(1) of the draft regulation, must also reflect the particular circumstances of low-income building residents. The deployment of new technologies must have economic and health benefits for the low-income end users as an objective, along with the reduction of greenhouse gas emissions. Low-income residents must be provided with opportunities to effectively participate in the emerging low-carbon markets.

The priorities for program development, listed in subsection 6(3), must also take into account the financial realities of low-income households. Building on paragraph 6(3)(5), the needs of low-income households must be addressed not only through the use of technology, but also through making energy more affordable. Many Ontarians already struggle to afford their monthly utility costs, especially in rural and northern communities. Any deployment of fuel-switching technologies must be done in a way that mitigates the utility costs for the affected households both in the short and long-term horizon.

In order to effectively implement the goals of the Ontario Climate Change Solutions Deployment Corporation, the Board of Directors must also include individuals who have experience working with low-income, as well as Indigenous communities. The list of areas of expertise that the Board shall possess, in subsection 9(3), must be expanded to also include expertise representing

the interests of low-income communities, rural and remote households, Indigenous communities, and experience working on issues of energy poverty in Ontario.

Thank you for your consideration of our submissions. Please do not hesitate to contact me with any questions.

Yours truly,

**CANADIAN ENVIRONMENTAL LAW ASSOCIATION**

A handwritten signature in blue ink, appearing to read 'Barbora Grochalova', with a long horizontal flourish extending to the right.

Barbora Grochalova  
Counsel