



April 14, 2022

Soren Halverson  
Special Advisor to the Deputy Minister  
Environment and Climate Change Canada  
ECD-DEC@ec.gc.ca

**Re: Clean Electricity Standard**

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Dear Mr. Halverson,

Thank you for the opportunity to provide comments regarding the “Clean Electricity Standard in support of a net-zero electricity sector” discussion paper. I am writing on behalf of the Saskatchewan Chamber of Commerce, the voice of business in Saskatchewan for over a century.

The Saskatchewan Chamber’s 2021 report *Building the Low Carbon Economy: Exploring Opportunities and Challenges for Saskatchewan*<sup>1</sup> recognized that “a significant piece of Saskatchewan’s move to a low carbon economy will be executed through the province’s energy production.” Through the Chamber’s continuous engagement with the local business community, we have repeatedly heard that stability/ reliability and affordability are the main priorities for Saskatchewan citizens considering their household power. In maintaining these priorities, relatively inexpensive but emissions-intensive power generation sources, like coal and natural gas, were favoured and contribute the most to Saskatchewan’s current power mix. Substantial investments will be necessary to develop a net-zero electricity grid.

Due to regional variations, Saskatchewan is unique and will face greater challenges in getting to net zero electricity by 2035. There have not been many reliable and affordable zero emission options established for Saskatchewan power generation, so significant investments will be required. But this also means that each dollar invested in Saskatchewan will result in greater emission reductions than investments in provinces that already have power from renewable sources such as hydro. The Government of Canada should recognize these differences in funding promises and the impending regulations.

Industry and electricity producers are supportive of a net-zero future and are moving towards more renewables and non-emitting generation. These investments will allow

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<sup>1</sup> <https://saskchamber.com/isl/uploads/2021/03/Building-the-Low-Carbon-Economy-Exploring-Opportunities-and-Challenges-for-Saskatchewan.pdf>

them to maintain and improve their competitiveness in international markets that value low carbon products. But the Clean Electricity Standard's ambitious net-zero emissions grid by 2035 goal depends on technology that has not been proven to be reliable at a commercial scale. Decisions need to be made now based on currently available options. As new technologies emerge over time, further steps towards net-zero can be taken incrementally. The regulations should allow flexibility so each company can strategize according to their individual circumstances. Throughout all the changes required in transitioning to net-zero, reliability of the electricity supply must be maintained.

While the precise impact of the Clean Electricity Standard on rates is unknown, there is potential for considerable loss of business competitiveness, greater cost of living, energy poverty, and so forth. The cost to achieve net zero must not increase rates beyond the carbon tax. Thus, federal financial support will be vital for this transition.

Renewable energy projects are being planned, there just needs to be a path to market, certainty, and government support first. The Government of Canada should play a role in prioritizing the research, development, and scale up of low or zero emission sources of electricity.

Thank you for your attention in this matter. With the right conditions, there will be numerous economic development opportunities available on the path to a low carbon economy. The Saskatchewan Chamber of Commerce would be pleased to provide further comment at your convenience.

Yours sincerely,

*Original signed by*

Thomas Benjoe, Chair  
Saskatchewan Chamber of Commerce

CC: Saskatchewan Chamber of Commerce Environment Committee  
Honourable Jonathan Wilkinson, Minister of Natural Resources Canada  
Honourable Stephen Guilbeault, Minister of Environment and Climate Change Canada  
Honourable Warren Kaeding, Minister of Environment  
Honourable Bronwyn Eyre, Minister of Energy and Resources  
Mark McLoughlin – Deputy Minister, Ministry of Environment  
Susanna Laaksonen-Craig – Deputy Minister, Ministry of Energy and Resources