

Feedback Form

Local Generation Program – April 23, 2025

Feedback Provided by:

Name: Tim Curtis

Title: President

Organization: Energy Services Niagara Inc

Existing contract number (if applicable):

Email:

Date: April 30, 2025

Following the April 23, 2025 webinar to provide information on the Local Generation Program (LGP) and the high-level design of the program, the IESO is seeking feedback on the high-level design of the recontracting stream of the LGP

The referenced presentation and supporting materials can be found under the April 23, 2025 entry on the [Local Generation Program webpage](#).

Commented [A1]: Has this been updated on IESO website?

To promote transparency, feedback submitted will be posted on the Updates to IESO Monitoring Requirements: Phasor Data engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Yes" below:

- ☐ Yes – there is confidential information, do not post
- ☒ No – comfortable to publish to the IESO web page

Please provide feedback by May 9, 2025 to engagement@ieso.ca. Please use subject: *Feedback: Local Generation Program.*

Specific Questions for Existing Facilities / Suppliers:

Timing and logistical issues in recontracting

1. How long before the expiration of your existing contract could you confidently submit a price (\$/MWh) to continue operation of the facility after the contract expires?

- ☐ 1 year
- ☐ 2 years
- ☐ 3 years
- ☐ 4 years
- ☐ 5 years
- ☒ More than 5 years

2. In the case of recontracting, would you prefer (multiple choice):

- ☒ For my new contract to start immediately after the old contract expires; or
- ☐ To be able to propose a new contract term start date; or
- ☐ Something else (please provide details)

[Click or tap here to enter text.](#)

3. Do you anticipate any need to shut down your facility temporarily when the existing contract expires?

- ☐ Yes

If yes, for how long?

[Click or tap here to enter text.](#)

- ☒ No
- ☐ Not sure

If not sure, what additional information do you need?

[Click or tap here to enter text.](#)

4. Do you anticipate any need to shut down your facility permanently when the existing contract expires?

- ☐ Yes

If yes, what is the reason?

Click or tap here to enter text.

- ☒ No
☐ Not sure

If not sure, what additional information do you need?

Click or tap here to enter text.

5. What risks and or challenges do you anticipate around being able to recontract your existing facility to supply electricity?

Depending on contract rate, may want to use some of the generation for net metering.

Refurbishments, upgrades and expansions

6. Are you planning to refurbish, upgrade or expand your facility?

Considering an upgrade

- a. If you are planning to change your facility, when would you want to do that?
Prior to the new contract commencing.

7. Do you intend to increase your installed capacity or keep it the same as the existing capacity? Please describe why it might remain the same or change.

All depends on the price. Likley will want to increase installed capacity but may want to use some of the existing capacity for net metering.

8. Do you know if your connection point and or local circuits could support an expansion or upgrade? Please provide details.

Yes. Local connection can support an upgrade.

9. What risks and or challenges do you anticipate around refurbishing / upgrading or expanding your facility?

Biggest risk is financial. Will want certainty as to price before making any upgrade.

Other Comments/Feedback

Topic: High Level Program Design	Feedback
Re-contracting: Contract installed capacity	The presentation refers to re-contracting FIT contracts but for 100 kW – 10 MW installed capacity. A number of FITs have an installed capacity less than 100 kW. These should still be included as are too big for net metering. Alternatively, allow the LDC to contract directly for projects lower than 100 kW.
Re-contracting: Standard Offer Price	The IESO is proposing only a bidding process. Many of the smaller generators would prefer both certainty of price and an easier process. Also, the generation would have been fully written off so a high price is not needed to earn a good return. The IESO should consider offering a lower but guaranteed standard offer price. Supplier can choose between the risk of bidding a higher price of the certainty of the lower price.
Re-contracting: Upgrades	Suppliers may want to increase or decrease the contracted capacity depending on opportunities to increase the capacity or need to use some of the capacity. Suppliers should be able to offer at a capacity different than the current installed capacity.
New Builds: Contract installed capacity	Allow the LDC to contract directly for projects lower than 100 kW.
Click or tap here to enter text.	Click or tap here to enter text.

General Comments/Feedback

Fully support this initiative but let's make it as easy as possible for the smaller generators.