

Feedback Form

Local Generation Program – April 23, 2025

Feedback Provided by:

Name: Paul Klaesi

Title: Secretary-partner

Organization: Fepro Farms

Existing contract number (if applicable): [REDACTED]

Email: [REDACTED]

Date: May 1, 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?

Contract details like 1. higher peak production 2. Size of output 3. Gas digester update

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?

Biodigester are "holistic" systems, processing natural materials to create biogas and only then the energy is available to be cleaned and used in generation equipment. If digester industries can survive recontracting and pricing increase for servicing our systems in the long run, we see a possibility to continue and reinvest long term. We would like to see at least a 10 year indexed contract.

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

Referring to the webinar from April 23. I am worried IESO has a one fits all approach in contracting systems. Biogas technology is vastly different from natural gas, Solar or Hydro generation.

We would appreciate if IESO would consider the Biogas associations knowhow and connections to establish structured pricing by size. 100-250KW / 251-500KW / 500+1MW / 1MW+

Refurbishments, upgrades and expansions

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

We would be ready to invest and update our system to modern standards and efficiencies.

(additional digester vessels, gas storage for longer peak production)

- a. If you are planning to change your facility, when would you want to do that?

After a new contract with adequate length is established

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.

We would be ready to look at options to increase our generation

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

Not sure, We could propose to increase biogas generation in times when our solar system is not producing. (winter, cloudy days, evening and night

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

Approvals process especially with Hydro one

Other Comments/Feedback

| Topic: High Level Program Design | Feedback |
|--|---|
| Click or tap here to enter text. 5 years proposed contracts | Click or tap here to enter text. To short for digester technology, could be ok for solar |
| pricing | should be established in discussions with biogas association and applied. To difficult for one single system We need to remember that it is renewable energy. |
| Service cost by technology | There seems no consideration about different technologies. Biogas processing equipment has a lifespan 10-20 years. Updating will be a big percentage of a new build |
| Biding process | discussions should be possible during the biding process between generator and IESO, especially for small, unique systems. |
| Click or tap here to enter text. | Click or tap here to enter text. |

General Comments/Feedback

We appreciate the opportunity to extend feedback and hope for continued dialogue and willingness to understand unique challenges, created by technology location and size.

Paul Klaesi
Fepro Farms Cobden