

Feedback Form

Local Generation Program – April 23, 2025

Feedback Provided by:

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Title: Senior Manager, Regulatory and Market Affairs

Organization: Northland Power Inc.

Existing contract number (if applicable): multiple

Email: [REDACTED]

Date: May 9, 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

Difficult to say at this stage. In the case of simple recontracting (i.e. no capital expenditures), less time is needed to derive bid prices, and so a shorter time period may be appropriate. But in any event, no earlier than 2 years out. If it involves capital expenditures, price certainly will be needed even earlier in order to commit to purchasing long-lead time items.

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)

Provided the recontracting does not include a refurbishment, upgrade, or similar capital work, a contract that commences immediately after the old contract expired would be preferable.

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?

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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?

Click or tap here to enter text.

Refurbishments, upgrades and expansions

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

Depends on the incentives the IESO provides through its Local Generation Program. Standard offer programs would provide maximum revenue certainty such that proponents can confidently assess whether additional capital expenditures make sense.

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

Proponents are not likely willing to take a construction outage earlier than the end of their current contract term, forgoing associated revenues. That said, if the IESO had a pressing reliability need that necessitated these facilities to return to operation at an earlier date, commercial arrangements could be made to account for the early downtime and foregone revenues

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.

Please refer to 6.

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

Click or tap here to enter text.

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

Ensuring sufficient revenue certainty in advance of undertaking significant development work on a large number of small sites. This is a large undertaking, and while the sites may be relatively small, they each must check the same boxes as large-scale projects (site control, permitting, interconnection, etc.).

Other Comments/Feedback

Topic: High Level Program Design	Feedback
Incentives offered through the Local Generation Program	Given the significant development work needed to assess the viability of a large number of small sites, early revenue certainty is important, ensuring the juice will be worth the squeeze. Standard offer programs – offering standardized terms and prices to those that opt in – provide the most certainty. To establish appropriate terms and pricing, the IESO could undertake a detailed RFQ. In addition to providing proponents with the necessary certainty, it would greatly reduce the administrative burden of running an RFP.

Topic: High Level Program Design	Feedback
Reducing the administrative burden associated with bidding and evaluating multiple similar projects from the same proponent.	Many proponents will own multiple small facilities that share many similar characteristics (layout, size, etc.). These facilities are also likely to benefit from economies of scale as operations and maintenance teams can service many sites that are proximate to one another. As such, the IESO should consider how it may reduce the administrative burden of bidding in and evaluating these multiple projects. It may also consider how it may allow flexibility in bidding in a lower grouped price – assuming all projects in the group are selected – and an individual facility by facility price.
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General Comments/Feedback

Click or tap here to enter text.