

The Ontario Clean Air Alliance has three submissions with respect to the IESO's proposed Local Generation Program (LGP) for existing facilities and new builds:

1. Fossil fuel generation facilities should be excluded from the program;
2. Roof-top solar facilities should be eligible for inclusion in the program; and
3. A standard offer price (s) should be established for program participants.

1. Fossil fuel generation facilities should be excluded from the program

[More than 70% of the energy that is used to power Ontario's gas-fired power plants is imported from the U.S.](#)

Nevertheless, according to the IESO's *2025 Annual Planning Outlook*, fossil gas will be responsible for 25% of Ontario's electricity generation in 2030 – up from only 4% in 2017.

It doesn't make sense to increase our dependence on American gas when Canada's sovereignty and economy are under attack by President Trump.

Therefore, we recommend that fossil generation facilities should be excluded from participating in the LGP.

2. Roof-top solar facilities should be eligible for inclusion in the program

Roof-top solar has the potential to make a very substantial contribution to meeting Ontario's future electricity needs. For example, according to our report, [Transforming Toronto with Solar](#), rooftop solar projects located in the City of Toronto could meet 50 to 80% of Toronto's electricity needs.

We recommend that all environmentally responsible renewable energy projects, including roof-top solar, should be eligible to participate in the LGP.

3. A standard offer price (s) should be established for program participants

We strongly support using a competitive bidding process to procure electricity from large generation projects.

But the IESO's proposed LGP competitive bidding process for small power projects does not make sense since it will impose onerous costs on participants and create unnecessary uncertainty as to whether their projects will be funded.

Instead of discouraging participation by creating needless red tape, the IESO should establish a fair market value standard offer price(s) for small-scale generation projects. All projects that are willing to accept the fair market value standard offer price(s) should be awarded contracts.

A fair market value standard offer price(s) will lead to increased electricity supply for Ontario and lower electricity rates for Ontario's homes and businesses.