

Feedback Form

Local Generation Program – June 5, 2025

Feedback Provided by:

Name: Dennis O'Farrell

Title: Board member, CECC

Organization: Community Energy Co-operative Canada (CECC)

Existing contract number (if applicable): Click or tap here to enter text.

Email: [REDACTED]

Date: June 19, 2025

Following the June 5, 2025 webinar to provide an update on the Local Generation Program (LGP), 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 June 5, 2025 entry on the [Local Generation Program webpage](#).

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 June 19, 2025 to engagement@ieso.ca. Please use subject: *Feedback: Local Generation Program.*

General Questions for Existing Facilities / Suppliers:

1. Have you been following the IESO Medium and Long Term Procurement engagement sessions and or been reviewing those RFPs, and contracts etc?

Yes CECC members have been following to a limited extent. However, as mostly volunteer-based organizations members have limited administrative resources to apply. Also, the scale seems to be beyond what renewable energy cooperatives would usually be involved in.

2. Were you aware of ERP before today's presentation?

Yes

3. Which IESO offers are you most interested in for your facilities? Why?

Members are mostly interested in the Local Generation Program (LGP) as the scale (between 100kW and 10MW) is well-suited for community-scale renewable energy and storage projects, the re-contracting stream of the LGP is essential for extending the life of our members' many existing Feed-in Tariff (FIT) sites, distributed local energy production (and storage) is an essential focus of all our renewable energy co-operative members enhancing community energy resilience and accessibility, and the LGP has the potential to prioritize community equity and governance, ensuring local economic development and direct benefits for residents.

4. Do you need more information about the different IESO offers to make a decision? What information do you need?

We need to know more about how the process will be streamlined and simplified for smaller, local projects. A concern is that the LGP may be cumbersome and challenging for small, community based organizations like renewable energy co-operatives. We need more details and further opportunities for consultation once those details are known.

5. What if any thoughts do you have around your larger (>1MW) facilities participating in the IESO electricity market?

Projects greater than 1MW and up to 10MW are important to renewable energy cooperatives as they can contribute significantly to local supply needs and engage many residents and members while leveraging economies of scale.

We recommend the LGP design offer direct revenue streams or contract mechanisms to compensate for Community-Scale Battery Energy Storage Systems (BESS) that would bolster the value and stability of larger distributed energy projects.

6. What are the top 3 reasons you might be interested in an opportunity through LGP instead of the IESO's Long Term (LT) procurement, or ERP or a corporate PPA?

The ERP and LT process give advantage to larger organizations. The LGP is a welcome option that should focus on facilitating the participation of smaller, locally owned and controlled organizations that can generate significant co-benefits to Ontarians.

Members are committed to continuing the operation of existing systems and the recontracting process under the LGP seems to be the only option.

A well-designed LGP can provide a more accessible and streamlined pathway for community based organizations to develop distributed generation projects.

7. What are the top 3 reasons you are considering building new electrical generating facilities to connect to the distribution (Dx) system instead of facilities to connect to the transmission (Tx) system?

Community: Smaller-scale, distribution-connected projects that are owned and operated by the community are more attractive to local residents.

Interconnection: Generally, distribution connected projects enjoy shorter lead times and lower cost interconnection requirements compared to large-scale transmission connected facilities.

8. What would be the main drivers around your decision to choose some specific location to develop a facility?

Local Distribution Capacity & Grid Interconnection: A site must have sufficient capacity on the local grid and a clear and straightforward process to determine ability and cost associated with interconnection.

Proximity to Local Demand/Load Centers: Siting projects where energy is consumed maximizes local benefits, reduces transmission losses, and improves overall system efficiency.

Community Interest & Support: Strong interest and support from our membership in and around the local community, including Indigenous communities, is a key driver. We believe that where communities are genuinely engaged in electricity generation they are likely to be enthusiastic partners.

Available Land/Infrastructure: Access to suitable land or existing infrastructure (e.g., municipal buildings, agricultural sites, industrial zones) that minimizes environmental impact and development costs.

Economic Development Potential: Opportunities to create local jobs, generate tax revenue, and foster energy literacy within the community..

Other Comments/Feedback

Topic: High Level Program Design	Feedback
Community-based and Indigenous Ownership	While the IESO plans to work with Government to determine if or how community-based and or Indigenous ownership may be considered in the new build stream. We recommend that this consideration extend to re-contracting and refurbishing streams as well. We suggest price adders or prioritization of projects that are owned by residents of Ontario via renewable energy co-operatives. re to enter text.
Aggregation for Simplification	What does "cost-effective" mean as a condition to allow aggregation? CECC recommends allowing multiple projects on a single feeder line to aggregate into a single project submission.
Bid Guidance	What does it mean when the IESO says "LGP will use a consistent, simple, competitive process for price submissions where proponents can request the price they need to operate." CECC requests more information from the IESO on the specifics of this process and the opportunity to provide further feedback.
Long Duration of New Build Contracts	CECC recommends that new build contracts should (1) contract for at least 20 years, (2) allow rooftop systems of any size less than 10 MW, and (3) lower the eligible size to 100 kW
Re-bidding Confirmation	CECC requests confirmation that proponents will not have to re-bid every year and that their bid will stand for re-bidding unless adjusted by the bidder.

General Comments/Feedback

We strongly encourage the IESO to implement supports for co-operatives and other community capacity set aside eligible organizations that will retain the economic rewards of the Local Generation Program with Ontario citizens. Program elements should include incentives for substantial local ownership models (like co-operatives, municipal, or Indigenous ownership) and direct community benefit-sharing, offering higher evaluation points for structures that embed local decision-making and deliver concrete value to Ontario citizens and their communities.