

# Feedback Form

## Local Generation Program – June 5, 2025

### Feedback Provided by:

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Organization: [CHP Canadian Advisory Network](#)

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](mailto: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

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

Click or tap here to enter text.

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

Click or tap here to enter text.

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

Click or tap here to enter text.

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

Click or tap here to enter text.

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?

Click or tap here to enter text.

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?

Click or tap here to enter text.

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

Click or tap here to enter text.

## Other Comments/Feedback

Topic: High Level Program Design	Feedback
Contract terms	<p>We are supportive of longer contract terms, e.g. 20 years. Short-term contracts with frequent need to re-bid creates too much pricing uncertainty and risk for proponents. Longer term contracts provide the certainty which is required to re-invest in these facilities to keep them providing reliable, clean electricity for a long time. Longer term contracts should also provide lower prices in the procurement.</p> <p>Requiring smaller facilities to bid every five years in a competitive process creates significant red tape and costs, and a more complex process. It may discourage participation of small facilities, where energy may not be their primary business.</p>
Technology Streams	<p>We recommend introducing technology specific streams for both recontracted and new construction projects, to recognize the value provided by different technologies, e.g. CHP offers unique value in terms of grid resiliency, improved overall system efficiency, and local economic development support, which may come at a higher price. Without technology-specific streams, it is likely that the values of CHP will not be procured if competing against other renewable resources on a price-only basis. We recommend applying the 80% procurement principles within each separate technology specific stream.</p>

Program design allowing for behind the meter

We recommend that the program allow for generators to serve local loads as well as export to the grid when available / needed, rather than restricting the program to export only. There is precedent for this in CHP contracts at industrial and institutional facilities that allow the CHP units to play a dual role in providing both reliable power to facility loads as well as energy and capacity to the grid. Many industrial facilities with potential for recontracting or new CHP facilities have equipment physically connected behind the meter.

We recommend the IESO allow for these industrial facilities to participate in the LGP without adding prohibitive costs required to reconfigure these generators to be connected directly for export in a dedicated meter to LDC distribution systems.

Behind the meter configurations provide critical energy and capacity to industrial sites across Ontario, while providing essential critical backup power benefits that support business continuity during power outages. Strategically placed revenue-grade metering could be a solution that would allow these behind the meter facilities to participate in the LGP.

General Comments/Feedback

Click or tap here to enter text.