

# Local Generation Program – June 5, 2025

## Feedback Provided by:

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Organization: FLT Energy INC.

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

Email: [REDACTED]

Date: June 18, 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?

No, we have not followed the MTP or LTP engagements before the June 5th webinar but we are interested in fully understanding the programs and assessing the feasibility of building and optimising facilities to meet the growing need of the Ontario grid system.

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

We were aware of the energy storage needs and some technologies but not the ERP. We have a strong understanding of energy storage and would like to pursue opportunities in providing energy storage and providing new energy storage technology to support the growing needs.

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

LGP- To renew contracts on existing facilities

LTP- Looking at expanding current facilities and/or developing new facilities

ERP- Looking at energy storage opportunities

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

Yes. In the interest of getting up to speed as quickly as possible, we will review information on the website but would like to do a follow up call with the IESO to help clarify and improve our understanding of the IESO's initiatives and its programs.

We would like to be a part of all programs, conferences and conversations surrounding any of the above mentioned programs, as well as any further relevant information.

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

With larger facilities participating in the market, what steps is the IESO taking to ensure a competitive market will be created rather than a monopoly.

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?

Our first priority is to procure new contracts for our existing facilities. However, we are also interested in expanding business into any other feasible programs.

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?

We are open to building new facilities that would connect to either Dx or Tx. Factors we would consider include:

- Grid capacity availability/requirements
- Location /available land
- Economic feasibility

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

We would consider the following questions when looking for land to develop a facility:

- Grid capacity requirements/availability
- Land availability
- Economic Feasibility
- Willingness of all levels of government to support and not hinder the project

## Other Comments/Feedback

| Topic: High Level Program Design  | Feedback  |
|---|---|
| Non-contracted producers to be able to continue production past contract date at the Ontario Electricity Market Price | Will this be a fixed rate or floating to match peak and off hours? We would like a better understanding of the functionality of this. |

| Topic: High Level Program Design | Feedback  |
|----------------------------------|---|
| Contract Aggregation             | Would it be possible to combine multiple Microfit contracts into a single fit group in order to be eligible for contracts?  |
| 5 Year Contract Term             | Limiting contract terms to only 5 years is a deterrent to new facility consideration as it is most likely to make them unfeasible   |
| Government Support at All Levels | What steps are being taken to ensure that local, provincial and federal government will not interfere with the economic feasibility of facilities through new legislation, development charges, additional income tax (tax policies ie. passive versus non-passive), or property taxes that would make projects unfeasible. |
| Shift to larger producers        | With the phasing out of Microfit contracts, there seems to be a push towards the IESO dealing with larger producers. What systems will be in place to prevent a few large groups controlling the market and gaining monopoly (a non-competitive market)?  |

## General Comments/Feedback

We are very excited with the direction the IESO is headed in regards to contract renewals as well as industry growth. A couple of our key concerns:

- Limiting the contracts to 5 years may dissuade many from bidding on contracts as it makes the projects unfeasible and dissuades further development
- Keeping the market competitive will be better for producers and ratepayers
- Making sure that all players are on the same page for growing this industry (IESO, producers, HydroOne, LDCs, government, OEB, CanREA etc.)
- With oil/gas energy production being phased out in the coming decades, what is the IESOs target percentage of the market for renewable sources in the same time period?

-Within contract production limits, no equipment upgrade restrictions. As technology advances, no restrictions would encourage further technological development and create an efficient, productive and long term energy supply