

# Feedback Form

## Local Generation Program – June 5, 2025

### Feedback Provided by:

Name: Grant Taibossigai

Title: Interim Mchigeeng First Nation Interim Business and Economic Development Manager

Organization: M'Chigeeng First Nation

Existing contract number (if applicable): [REDACTED]

Email: [REDACTED]

Date: October 25, 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 were not aware of this program**

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

**No, we were not aware of this program**

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

**Local Generation Program and new program related to First Nation specific programming and funding applications. We want to re-contract our existing MERE wind farm and we want to expand this project. We also want to find out what available resources IESO has or will have to assist us in our current and long term energy planning initiatives.**

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

**We wish to know the factors that the IESO will use in considering an indigenous proponent's project for a contract?**

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

**We plan to submit to the maximum carrying capacity of the 44 kV feeder line we are connected to. This could be 9+ MW.**

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?

**We prefer the LPG over a corporate PPA because the offtake partner is an undoubted credit risk, plus the program is similar to the FIT program which we are already engaged with. A third factor is the project size, which we can manage with our own resources. Our goal is to own 100% of the projects as an indigenous proponent using our own equity and funds borrowed under commercial terms. We feel the LPG allows us to fulfill our goals without having to partner with a larger co-proponent. We feel we are not interested in LT procurements because these are**

**designed for much larger project scale – scale which is beyond our capacity to undertake by and with our own resources. Our project goals focus on projects that can fit on, or near, M’Chigeeng First Nation Reserve lands, and where there are distribution lines nearby, hence the LGP program is better for us.**

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 focused on projects on Manitoulin Island. There are no Tx facilities nearby that can affordably serve the project scale that we desire. There are only distribution lines nearby. So, reason #1/ Tx facilities are expensive and not proximate, 2/ TX facilities would force us to build larger projects, and 3/ We have a project already connected with Dx facilities.**

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

**M’Chigeeng First Nation already has a project located on Reserve lands. We can imagine growing this project or creating a new project nearby, but we prefer not far from the existing Reserve lands. We prefer to deal with Band members and M’Chigeeng First Nation who own private/community lands. Additionally we have access to a 44 KV feeder line that is proximate to the project’s target land parcels.**

## Other Comments/Feedback

| Topic: High Level Program Design | Feedback                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Bid Security</b>              | We think the IESO should relieve Indigenous communities from the requirement of posting large bid securities. There is no material harm to the IESO should an awarded DER project fails to be deployed. Plus having a contract award with a crown offtake partner makes the probability of a successful deployment very high. |

| Topic: High Level Program Design             | Feedback                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Indigenous Engagement</b>                 | <p>M'Chigeeng First Nation is happy to compete in a competitive bid situation for forthcoming energy procurements, but we have very few resources available for making a bid occur. We would appreciate a signal or communications that indicates a high probability of success for a forthcoming bid, in order for us to organize the resources required to submit a bid. One such signal could be a set-aside for indigenous submissions. Another could be a price adder similar to what was embedded within the FIT program. We would want the adder to be sensitive to the amount of indigenous ownership in a project, with 100% ownership obtaining a higher value than 50% ownership. Continuous involvement /participation in all planned and scheduled IESO engagement sessions.</p> |
| <b>Build Ready Status</b>                    | <p>We understand that the IESO will select projects based on price. What about time to completion? Since we already have a connection for MERE Phase I, we feel Phase II could be deployed and connected quickly. We would appreciate a signal from the IESO that indicates this would be a preferred status.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Support to Achieve Build Ready Status</b> | <p>We would be happy to invest in permitting and feasibility studies to accelerate obtaining build ready status, but we would appreciate financial support from the IESO in going along that path.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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## General Comments/Feedback