

Feedback Form

Local Generation Program – June 5, 2025

Feedback Provided by:

Name: Chris Caners

Title: General Manager

Organization: TREC SolarShare Co-operative (No. 1) Inc. "SolarShare"

Existing contract number (if applicable): We hold dozens of FIT Contracts

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

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

No

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

Local Generation Program. As a renewable energy co-operative, we operate smaller scale, distribution-connected generation systems. Our resources are locally sited, which supports local energy commitments, addresses local energy supply concerns, and empowers Ontario residents to participate in the electricity system. We believe that the LGP can generate local benefits for communities, support grid resilience and distributed generation, and extend the life of our existing assets at cost-effective rates.

Our understanding is that the Enabling Resources Program is for dispatchable facilities only targeted at bulk transmission system players, which are challenging for small, community based organizations to participate in.

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

We applaud efforts by the IESO to simplify and streamline the LGP process. We remain concerned that the LGP may be cumbersome and challenging to engage with especially for small, community based organizations like renewable energy co-operatives. We request that the IESO provide more details on the proposed LGP process as soon as possible and offer further opportunities for consultation once those details are known. We also recommend that the IESO specifically support 'genuine' renewable energy co-operatives to maximize their contribution to the LGP and therefore benefits to Ontarians.

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

SolarShare is very supportive of projects larger than 1 MW being within the scope of the LGP, as projects of this size can contribute significantly to local supply needs while also achieving improved economies of scale. Allowing projects of up to 10 MW is very important to SolarShare as this will help us to deliver the lowest-cost electricity with the greatest economic benefit to Ontario.

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 have two reasons that the LGP is much preferable the ERP and LT process, which advantage larger organizations with significant access to capital, expertise and deep experience operating assets as a market participant. The Local Generation Program is a welcome option that should focus on facilitating the participation of smaller, locally owned and controlled organizations to support the goals of the IESO. We believe that the LGP can help grow community energy substantially and generate significant co-benefits to Ontarians.

Recontracting and repowering existing facilities: We are very interested in continuing to operate our existing systems, including repowering facilities where appropriate. Extending the life of these existing facilities is undoubtedly a path to cost-effective electricity generation that is already integrated into the distribution grid and in the case of SolarShare, retains economic benefits in the province.

Simplified Process: A well-designed LGP can provide a more accessible and streamlined pathway for community based organizations to develop distributed generation projects (100 kW to 10 MW) that may find the complexities, scale requirements, and cost structures of the LT procurements, direct market participation via ERP, or corporate PPAs prohibitive or less advantageous given their specific community-oriented objectives.

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 have two reasons that we are interested in building new electrical generating facilities connected to the distribution system as opposed to the transmission system; however, we are open to connecting projects to the transmission system if feasible.

Community: Smaller-scale, distribution-connected projects that are owned and operated by the community are more attractive to local residents. Suitable host sites within existing community footprints (e.g., rooftops, brownfields, municipal lands), leading to higher social license and faster development.

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?

Ability to interconnect: the site must have sufficient capacity on the local grid and a clear and straightforward process to determine ability and cost associated with interconnection.

Community: Support of local residents proximate to the site is an important aspect of the decision making process. Community ownership and operation of the facility increases

acceptance of new facilities. We believe that where communities are genuinely engaged in electricity generation they are likely to be enthusiastic partners.

Suitable land or area: Long term access to cost-effective lands, rooftops or other areas.

If applicable: The price received for the electricity generated, if location specific.

Other Comments/Feedback

Topic: High Level Program Design	Feedback
Community-based and Indigenous Ownership	We understand that 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.
Aggregation for Simplification	What does "cost-effective" mean as a condition to allow aggregation? SolarShare 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." SolarShare 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	SolarShare 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

Topic: High Level Program Design	Feedback
Re-bidding Confirmation	SolarShare 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 greatly appreciate the IESO's efforts to establish the Local Generation Program. Distributed energy resources will be very important to Ontario's future energy mix and we applaud this initiative. 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 in Ontario.