Feedback Form

Local Generation Program – April 23, 2025

Feedback Provided by:

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Title: General Manager

Organization: Enlightened Clean Energy Canada Inc.

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

Email: [redacted]

Date: May 9, 2025

Following the April 23, 2025 webinar to provide information on the Local Generation Program (LGP) and the high-level design of the program, the IESO is seeking feedback on the high-level design of the recontacting stream of the LGP

The referenced presentation and supporting materials can be found under the April 23, 2025 entry on the Local Generation Program webpage.

Commented [A1]: Has this been updated on IESO website?

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**
- X **No – comfortable to publish to the IESO web page**

Please provide feedback by May 9, 2025 to engagement@ieso.ca. Please use subject: *Feedback: Local Generation Program*.

Specific Questions for Existing Facilities / Suppliers:

Timing and logistical issues in precontracting

1. How long before the expiration of your existing contract could you confidently submit a price ($/MWh) to continue operation of the facility after the contract expires?

☐ 1 year

☐ 2 years

☒ 3 years

☐ 4 years

☐ 5 years

☐ More than 5 years

2. In the case of recontracting, would you prefer (multiple choice):

☒ For my new contract to start immediately after the old contract expires; or

☐ To be able to propose a new contract term start date; or

☐ Something else (please provide details)

Click or tap here to enter text.

3. Do you anticipate any need to shut down your facility temporarily when the existing contract expires?

☐ Yes

If yes, for how long?

Click or tap here to enter text.

☒ No

☐ Not sure

If not sure, what additional information do you need?

Click or tap here to enter text.

4. Do you anticipate any need to shut down your facility permenantly when the existing contract expires?

☐ Yes

If yes, what is the reason?

Click or tap here to enter text.

☒ No

☐ Not sure

If not sure, what additional information do you need?

Click or tap here to enter text.

5. What risks and or challenges do you anticipate around being able to recontract your existing facility to supply electricity?

Extending the Connection Agreement/ Capacity with the LDC – IESO should engage with the LDC's to facilitate an expedited approach to allow LDC's to extend Connection Agreements to be in line with the contract renewals. Proponets should not have to re-apply and go through a new CIA process with LDC's to recontract their projects.

Capital investment into exisitng facilities – many of these facilities will require substantial capital investment in order to continue to operate for a term beyond the intial contract. This includes, roof replacements, inverter replacements, re-configuration and rework.

Refurbishments, upgrades and expansions

6. Are you planning to refurbish, upgrade or expand your facility?

Potentially – many of the commerical rooftop solar PV systems that are firm oversees will have equipment that is at the end of its useful life after the FIT contracts expire.

   a. If you are planning to change your facility, when would you want to do that?

      At the end of the contract term, and before the new contract term starts. IESO should consider giving Proponents the ability to have a refurbishment or upgrade period at the end of their initial contract term so that roof replacements, equipment replacement, or significant rework can be done.

7. Do you intend to increase your installed capacity or keep it the same as the existing capacity? Please describe why it might remain the same or change.

If the panels are still producing at a reasonable level at the end of the contract term, the capacity would remain the same. The physical size and technical specs (Voltage, Amperage, etc.) of PV modules have changed significantly over the past 20 years, so it would be very difficult to use the existing PV racking and DC infrastruture to simply upgrade PV modules.

PV system owners would need to essentially retrofit the entire DC portion of the system (modules, racking, combiner boxes, DC wiring) in order to change the installed capacity.

8. Do you know if your connection point and or local circuits could support an expansion or upgrade? Please provide details.

Until engaging with the local utility this would be unknown. Furhtermore, capcity for interconnection is constantly changing. For existing PV systems it would likely not make economic sense to change the AC nameplate capacity of the PV system, as all of the AC infrastrucutre would need to change.

9. What risks and or challenges do you anticipate around refurbishing / upgrading or expanding your facility?

Roof replacements – For commerical rooftop PV systems, the roofs of many facilities will likely need to be replaced at the end of the initial contract term. This will lead to significant capital investment to remove and reinstall the PV system. If a roof replacment is required, then a complete retrofit of the DC portion of the array would likely make the most sense. (i.e. replace panels, racking, DC wiring, etc.

Finding compatible replacments components – For commerical PV systems, once the components are at the end of their useful life, it becomes difficult to source "like for like" replacement components. PV technology has changed drastically over the last 15 – 20 years, which makes partial replacements/ refurbishments more difficult. Therefore, complete retrofits will need to be evaluated.

Other Comments/Feedback

Topic: High Level Program Design	Feedback
Maintenance Period	Existing facilities should receive a "maintenance period" after the initial contract ends and the re-contract term begins. This will allow proponents to carry out the necessary upgrades or rework needed to operate the project for an additional term, without reducing operational time where the facility could be earning revenue.
Re-contracting and New Build Stream	Two streams should be created, one for existing facilities that will be re-contracted and another for new generation projects. This appears to be the intent of the program design, however sites that are being re-contracted will likely be able to bid at a lesser rate (assuming minimal capital investment is required at the end of the term), so may not give new facilities the ability to compete, and therefore not allow additional DER resources to come online.
Tiers for different nameplate capacities	IESO should consider having program tiers for different system sizes (i.e. 100 kW – 500 kW, 500 kW – 5 MW, 5 MW – 10 MW). This would allow smaller systems to still participate, as the LCOE on larger systems will usually be much less.
Strategic areas as priority	Consider prioritizing sites that are in strategic areas whereby the grid will benefit from distributed generation.
Portfolio submissions	Consider allowing proponents to submit several projects as a portfolio single submission. Proponents will be able to take advantages of economies of scale if they are able to combine projects into a portfolio.

General Comments/Feedback

In general, rooftop solar PV can yield the lowest LCOE compared to any other type of solar PV installations on a kW for kW basis. Commercial rooftop solar allows distributed generation projects to provide electricity to the grid directly in the areas of high consumption. There are many large commercial buildings in Ontario that would opt for solar PV on the rooftop, however with the current net-metering and load displacement programs, commercial building owners are limited to producing the amount of power consumed by the facility. This provides uncertainty as energy consumption may change, or the tenants or purposes for those buildings could change. Therefore, many commercial owners are opting not to install solar PV because they do not want to carry the risk of what building tenants may consume. The ability to either sell all the power, or to contract the rate at which excess power can be sold to the grid, would eliminate that risk and make commercial solar PV a more viable investment.