Feedback Form

Local Generation Program – June 5, 2025

Feedback Provided by:

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Title: Energy Infrastructure and Environment Coordinator

Organization: Ontario Greenhouse Vegetable Growers

Existing contract number (if applicable): [redacted]

Email: [redacted]

Date: 06/19/2025

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?

   OGVG members have followed the RFPs and contracts available and several have participated in the previous contract offerings, most notably for combined heat and power. Specifically, several large agricultural operations have applied and never been accepted in the Long-Term Proucurement. It is our understanding that 82 MW of agricultural generation capacity was applied for but none were successful.

2. Were you aware of ERP before todays presentation?

   Yes, the offering as presented does not apply well to electrical generation integrated with greenhouse farms.

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

   Self-scheduling operation with a capacity payment for a defined number of hours would be part of offers of most interest to the greenhouse sector as they ensure stability of cost while enabling energy market participation and maximizing use of energy assets. Self-scheduling enables oeprational efficiencies to maximize the utility of the on-farm electrical generating assets. Offers inclusive of acting as a Market Participant are incongruous with greenhouse operations as they are complex and make asset maximization difficult.

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

   Information on programs designed for agriculture are essential to unlock and maximize the use of on-farm integrated generation. Information and guidance ensuring that on-farm integrated generation assets, where a combined heat and power unit would replace a boiler, are not subject to the prohibition of projects on agricultural lands is essential.

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

   All greenhouse farms are eager to participate at the size and scale that makes sense for their operations. Including larger operations provides the opportunity for those facilities at >1MW to participate in electrical generation. When it comes to the comparison of natural gas assets, reciprocal engines cannot be accurately compared with turbines. Greenhouse combined heat and power units inject heat into the greenhouse space whereas turbines do not utilize the heat. The approximately 30% efficiency gain from CHP over turbines from heat utilization in the greenhouse must be considered.

The system impact assessment must occur at the beginning of the process for those projects requiring the assessment. Conducting the assessment "early" in the process is insufficient as investments are made as the proposals are being assembled. It is critical for all generators that the ability to connect and participate is determined and made public before the undertaking of proposals.

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?

   Ontario Greenhouses have long been looking to participate through LT procurements but have been hindered at times by the previous stance on natural gas, lack of credit for efficiency from sending heat to the crops, a lack of capacity to the grid, and denials on LT procurements due to delays in communicating the need for clarical clarification.

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?

   The top reason to connect to the Dx system is the availability of capacity in the system and the speed and lower relative costs at which LDCs can provide connection assets.

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

Greenhouse operations are looking to provide on-farm generation assets that maximize their productivity and use of assets. The consideration of location would be tied either to existing farms adding combined heat and power assets to their current farms or future expansions in regions which make economic sense for greenhouse operations.

Other Comments/Feedback

Topic: High Level Program Design	**Feedback**
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General Comments/Feedback

An agricultural energy generation program focused on a stable offer to enable the generation of electricity integrated with farm needs is essential. Maximizing the participation of agriculture provides a once in a generation opportunity to support electrification, food security, and the economic sustainability of farms.