# Feedback Form

## Local Generation Program – June 5, 2025

### Feedback Provided by:

Name: Syd Healey

Title: Click or tap here to enter text.

Organization: Pure Solar

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

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**

X **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 todays presentation?

   Yes

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

   We are most interested in the LGP program for facilities under 10 MW, as it is intended to be a more simplified and streamlined offering. A well-designed, accessible program will allow us to efficiently reinvest in existing assets and continue delivering reliable, cost-effective power to Ontario ratepayers.

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

   Yes, additional clarity would be helpful—particularly regarding the specific eligibility criteria, contract structures, and evaluation timelines for each IESO offering.

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

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?

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 actively assessing connection options, and several practical considerations make distribution (Dx) connections more attractive in many cases:

   1. **Interconnection Feasibility:** Distribution-connected projects generally benefit from more straightforward technical requirements, faster interconnection approvals, and lower upfront costs, which can be critical to a project's viability.

2. **Land Use Alignment:** The types of sites we're evaluating—such as repowering opportunities, small-scale solar, and community-based generation—are often best suited to the distribution network due to their proximity to load and rural infrastructure.
3. **Program Fit:** Programs like the Local Generator Program are purpose-built for distribution-connected resources and provide a more suitable framework for smaller-scale or modular generation assets than traditional transmission-connected options.

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

Click or tap here to enter text.

## Other Comments/Feedback

| Topic: High Level Program Design | Feedback |
|---|---|
| CLI (Canada Land Inventory) Reclassification | Under the FIT program, solar projects were restricted from being sited on lands classified as Class 1, 2, 3, or Organic soils. These restrictions were based on CLI maps designed for broad-scale use, often at a scale greater than 1:50,000, which resulted in limitations and inaccuracies at the parcel level. While the IESO did allow proponents to engage qualified third parties—with additional independent validation—to identify suitable siting within mixed-soil properties (e.g., Class 4 or higher), it did not permit reclassification of soil types, even when studies demonstrated clear misclassification.<br>This overly restrictive approach significantly limited opportunities to deploy additional generation capacity and reduced participation among landowners, including farmers with underutilized land. Many parcels—particularly those with factors like steep slopes—could be appropriately reclassified through proper site-specific analysis.<br><br>**Suggestion:**<br>Allow bidders to engage qualified third parties to assess and, where appropriate, support reclassification of soil types. Where validated, these updated classifications should be accepted by the IESO for the purpose of siting solar facilities. This would open more viable land for development without compromising agricultural protections, while supporting the program's goal of expanding local generation. |

| Topic: High Level Program Design | Feedback |
| --- | --- |
| CLI Exemption for Small-Scale (<150 kW) Solar Projects | Under the FIT procurement, solar projects greater than 10 kW were subject to strict siting restrictions, including a prohibition on siting projects on Class 1, 2, 3, or Organic soils under the CLI system. This approach treated small-scale (e.g., kW-sized) projects the same as large, MW-scale facilities—despite their vastly different footprints and impacts.<br><br>Since the FIT program was introduced, solar panel efficiency has significantly improved, reducing the land area required for a given system size. For example, a 150 kW system may occupy less than 0.5 acres. Despite this, smaller projects remain subject to the same siting constraints as utility-scale developments.<br><br>Additionally, according to Hydro One's **Distributed Generation Technical Interconnection Requirements**, the maximum allowable capacity for systems connecting to single-phase distribution is 150 kW. Most rural areas are serviced by single-phase lines, and yet these small-scale projects face the same regulatory burden as much larger three-phase systems.<br>**Suggestion:**<br>Create a CLI exemption for solar projects 150 kW or smaller, particularly those connecting to single-phase lines. These systems are physically constrained, low-impact, and ideally suited to distributed generation in rural communities. Easing CLI and other overly stringent requirements for this project class would unlock more meaningful investment in local, low-cost generation while supporting rural landowners, farmers, and overall grid resiliency. |

| Topic: High Level Program Design | Feedback |
|---|---|
| Streamlined REA Process for Small-Scale Solar (<150 kW) | Current environmental permitting requirements under the Renewable Energy Approval (REA) process are not proportionate to the low-impact nature of small-scale solar projects—particularly those under 150 kW that connect to single-phase lines. These projects typically involve minimal land use, limited environmental disruption, and pose negligible risk to surrounding areas, yet they are subject to the same complex permitting pathway as much larger installations.<br><br>This barrier adds unnecessary cost and delay to rural and agricultural solar development and discourages smaller proponents from participating in local generation opportunities.<br><br>**Suggestion:**<br>The IESO should work with the Ministry of the Environment, Conservation and Parks (MOECP) to develop a streamlined REA process specifically tailored for single-phase solar systems under 150 kW. A simplified pathway—such as a standardized checklist or exemption process for low-impact installations—would make local generation more accessible, lower project costs, and accelerate deployment while maintaining environmental oversight appropriate to the project scale. |
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## General Comments/Feedback

Click or tap here to enter text.