

Feedback Form

Long-Term 2 RFP – December 13, 2023

Feedback Provided by:

Name: Chris Caners

Title: General Manager

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

Date: January 17, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender.

Following the LT2 RFP engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on specific items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to <mailto:engagement@ieso.ca> by January 15, 2024. If you wish to provide confidential feedback, please mark "Confidential". Feedback that is not marked "Confidential" will be posted on the engagement webpage.

Resource Adequacy Framework and Cadenced Procurement Approach

Topic	Feedback
Do you have any comments or concerns regarding the cadenced nature between upcoming LT and MT RFPs?	N/A
Do you have any comments or concerns regarding the proposed offering of both capacity style and new revenue model style of contracts, based on resource eligibility requirements and system needs?	N/A
Do you have any concerns regarding the proposed target setting approach for upcoming MT RFPs?	N/A
Do you have any comments regarding how best to employ bridging and extensions to contracts to facilitate the success of the Resource Adequacy Framework?	N/A

LT2 RFP Resource Eligibility and Timelines

Topic	Feedback
Do you have any general feedback on resource eligibility and timelines?	N/A
If the potential of repowering an existing facility applies to you, would you be interested in exploring this option further?	Yes we are interested in this option. We would like some clarity as to whether FIT and microFIT contracts are being considered for repowering. We strongly advocate to allow FIT projects to be repowered.
How should the optimal threshold for what constitutes a partial or fully repowered facility be determined and what considerations should be taken into account regarding the repowering of different resource types?	N/A

Topic	Feedback
What considerations should be taken into account for new-build DERs?	We believe that community ownership should be encouraged and incentivized, similar to the FIT program. Community ownership of distributed energy resources retains economic benefits in the community and supports community resilience.
Please express any interest and opportunities for uprates and/or expansions at any of your existing facilities.	We own and operate 34 FIT facilities and 17 microFIT facilities, with a total approximate capacity of 15 MW DC. A number of those facilities can be expanded to deliver more electricity to the grid. We are very interested in opportunities to expand our existing portfolio.

LT2 RFP Design Considerations – System Congestion and Deliverability Approach

Topic	Feedback
What early system congestion information do proponents need to guide them in choosing the location of their projects and when is this needed by within the procurement cycle?	N/A
Do you have any general suggestions for how to approach deliverability evaluation in the LT2 RFP?	N/A

LT2 RFP Design Considerations – General Feedback

Topic	Feedback
Do you have any comments regarding the impacts that agricultural land-use limitations may have on project development?	N/A
Do you have any comments regarding what evaluation criteria can be utilized to evaluate project readiness, given tight timelines and reliability needs?	N/A

Topic	Feedback
Do you have input on the proposed mechanism for valuing Indigenous participation?	N/A
Are there any other rated criteria that should be considered?	We strongly encourage community ownership as a metric that should be considered; alternatively, a percentage of the procurement should be reserved for ownership by communities (e.g. co-operatives), municipalities and Indigenous communities.

Long Lead Time Resources

Topic	Feedback
Does the proposed approach to enabling long-lead time resources enable meaningful participation or sufficient certainty?	N/A
What additional considerations should the IESO contemplate for enabling broader participation from long-lead time resources?	N/A

Revenue Model

Topic	Feedback
As a potential proponent, are you generally supportive of the proposed Enhanced PPA revenue model? Are there any other considerations that the IESO should look into further with regards to the revenue model?	N/A

General Comments/Feedback

Community ownership is an important vehicle for retaining economic benefits, community acceptance and resilience. We also believe that facilitating and enabling the deployment of distributed resources using virtual power purchase agreements (or virtual net metering) is a crucial tool that will support the expansion of distributed resources that will improve grid and community resilience.