

Feedback Form

Long-Term 2 RFP – June 13, 2024

Feedback Provided by:

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Date: June 27, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Confidential".

Following the LT2 RFP June 13, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the LT RFP [engagement web page](#).

Please submit feedback to engagement@ieso.ca by June 27, 2024.

Developing on Agricultural Land

Topic	Feedback
<p>Do you have any comments regarding the provision proposed within the Ministerial letter to: "Provide rated criteria points for projects that avoid prime agricultural areas."</p>	<p>Boralex generally agrees with the provision of providing rated criteria points for projects that avoid prime agricultural areas as defined by the Municipalities. However, Boralex would like to see more clarity on how rated criteria points would be applied. We believe there should be a scale for rated criteria points. For example, maximum rated criteria points awarded if a project completely avoids prime agricultural areas, partial rated criteria points if a project occupies less than 30% prime agricultural land, minimum rated criteria points if a project occupies greater than 50% prime agricultural land and zero rated criteria points if a project is 70% or greater on prime agricultural land. Using a scaled rated criteria approach will allow developers to have a more continuous land base for projects instead of patch work to avoid small pockets of prime agricultural land that maybe surrounded by other land uses.</p>
<p>Do you have any comments and considerations regarding the implementation of the Agricultural Impact Assessment (AIA)?</p>	<p>Boralex is supportive of completing an Agricultural Impact Assessment (AIA) for renewable projects located on prime agricultural land. Boralex's concern is that Municipalities will be overwhelmed and overloaded with work if AIAs are required pre-bid submission. It is Boralex's recommendation that AIAs are completed post contract award which allow Municipalities to focus only on projects that will be moving forward and will reduce their work loads.</p>

Resource Eligibility

Topic	Feedback
<p>Repowering considerations: Do you have any feedback to share regarding other resource types opportunities for repowering/refurbishment under the LT2?</p>	

Topic	Feedback
<p>Hybrid considerations: Do you have any feedback to share regarding hybridized facilities under the LT2?</p>	

LT2 Contract Provisions

Topic	Feedback
<p>Performance Obligations: Do you have any feedback to share regarding minimum Imputed Production Factor thresholds or the proposed calculation approach for Non-Performance Charges?</p>	
<p>Excess Deemed Market Revenues: Do you have any comments regarding the percentage of the negative Grid Reliability Payment that is to be paid back?</p>	

General Comments/Feedback

Borex is supportive of the prime agricultural policies proposed by OMAFRA regarding renewable development and municipal zoning. In order to allow municipalities enough time to devote staff resources to any potential zoning bylaw amendments or official plan amendments, we ask that any relevant zoning be changed by 18 months after a contract is awarded. That should be sufficient time for municipality staff to review a proposal once there is an official IESO contract, and enough time to factor in potential appeals.