

Feedback Form

Long-Term 2 RFP – July 4, 2024

Feedback Provided by:

Name: Shelby Dockendorff

Title: Advisor, Public Affairs and Communications

Organization: Boralex Inc.

Email: [REDACTED]

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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 July 4, 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 July 19, 2024.

MT2 RFP

Topic	Feedback
Do you have any feedback regarding resource eligibility under the MT2 RFP?	Boralex is generally supportive of the proposed resource eligibility requirements however, our preference would be to include facilities with contracts ending on or before December 31, 2029.
Do you have any feedback regarding the IESO's proposed method of determining the procurement target for the MT2 RFP?	Boralex is supportive of the IESO's proposed method of 80% of total MW of proposals submitted with the ability to procure more than the 80% target to ensure a reliable system.
Do you have any feedback regarding the contract structure or term length under the MT2 RFP?	We currently do not have any comments on the proposed contract or term length for the MT2 RFP however, would like the ability to provided future comments when more details on the contract structure are released.
Do you have any feedback regarding capacity qualification for the MT2 RFP?	
Do you have any feedback regarding proposal submission fees and proposal security requirements for the MT2 RFP?	Boralex is generally supportive of high proposal and security fees to set a high bar and ensure serious proponents. That said, when re-contracting assets we feel like the fees and proposal security amounts should be reduced to reflect the nature of the procurement.
Do you have any feedback to share regarding the IESO's proposed method of proposal evaluation under the MT2 RFP	We are supportive of ranking the proposals based solely on price.

LT2 RFP Capacity Stream

Topic	Feedback
<p>Do you have any feedback to share regarding the capacity stream under the LT2 RFP?</p>	<p>In terms of rated criteria, Boralex believes criteria based on long-duration assets should be removed in order to avoid favouring one technology over another. All capacity technology types should be viewed equally.</p> <p>Boralex is supportive of the requirement that municipal support resolutions be obtained prior to proposal submission. This encourages early and thorough engagement with the local communities where projects are being proposed.</p> <p>Due to Ontario’s energy and capacity needs identified by the IESO, it is important that projects be built as soon as possible. With that in mind, we are concerned about the removal of early operation payment incentives. The early operation payment incentive should be offered for the LT2 RFP Capacity stream to incentivize developers to bring projects into operation as early as they can ensuring that the IESO meets their critical commercial operation targets.</p>

LT2 RFP Proposal Evaluation

Topic	Feedback
<p>Do you have any feedback to share regarding the IESO's proposed method of proposal evaluation under the LT2 RFP?</p>	<p>Boralex has two main concerns with the evaluation process for the Energy Stream and the EPPA model.</p> <p>First, we see risk of proponents over-estimating the Production Factor to reduce the equivalent proposal price. The IESO should clarify further how it intends to mitigate this risk.</p> <p>Second, our understanding is that the EPPA evaluation process will not take nodal pricing in consideration. Therefore, two proposals with exact same proposal prices could result in very different GRP payable by the IESO if nodal prices differ materially. The IESO currently has no way to verify if Proponents are making sensible assumptions on the market revenues, and so risk project attrition prior to COD if prices stray materially from assumptions made during the RFP.</p> <p>We are favorable to evaluating Energy and Capacity streams separately and the 3 price/size laminations.</p> <p>We applaud the IESO's intention for evaluating all resource types under the Capacity Stream equally. This approach will yield better outcomes for ratepayers.</p> <p>We support evaluating the Capacity Stream proposals of LT2 in the same way as LT1.</p>

LT2 RFP Proposal Security

Topic	Feedback
Do you have any feedback to share regarding the proposal security requirements under the LT2 RFP?	<i>Boralex is not in favour of the IESO proposal of reducing the security deposit for participation in LT2. We believe it is important for proponents to have solid financial capabilities to bring projects all the way to COD. Reducing the Security Deposits may lead to projects receiving RFP awards but failing to successfully be developed and become operational.</i>

General Comments/Feedback