

Feedback Form

Long-Term 2 RFP – September 12, 2024

Feedback Provided by:

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Following the LT2 RFP September 12, 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 [Long-Term RFP \(ieso.ca\)](#).

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 “Yes” below:

- Yes – there is confidential information, do not post
- No – comfortable to publish to the IESO web page

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

LT2 RFP Deliverability Guidance – Update

Topic	Feedback
<p>Do you have any feedback to share regarding the updated Preliminary Connection Guidance document?</p>	<p>The new document came with interesting and useful updates. However, we still observe important limitations in the document, which make project siting for developers very difficult:</p> <ul style="list-style-type: none"> - There is no clear information on circuit maximum capacity, as everything is based on assumptions and subject to further studies. - There is no process to obtain this information before the bid submission, which put the developers at risk of spending months and money developing projects that are not deliverable in the end. This risk will impact either developers’ willingness to prospect in Ontario, their pricing in the submission, or both. <p>We reiterate that there is still time for the IESO to put forward a deliverability test process, that would give much-needed certainty to developers. If there is a constraint of time or resource in the IESO / HONI teams, we propose to hire and pay third parties to do those studies, with the input of the IESO / HONI and under their guidelines. If there is a concern of lack of effectiveness due to the volume of applications, IESO could consider to limit the number of submissions per Proponent and put a fee.</p>
<p>Do you have any feedback to share on the procedure to request access to the transmission system map or process to request pre-submission consultations?</p>	<p>The process is clear, and the map was easy to access.</p> <p>IESO and HONI should consider building an interactive online map (supported by GIS tools) where proponents can identify circuits name and get information on those circuits (restricted, to avoid, etc.)</p>
<p>Do you have any feedback on the types of information that you would like to see in the LT2 Capacity RFP Guidance Document?</p>	<p>See above – same comments as for the energy guidance document.</p>

LT2 RFP Design – Policy Considerations

Topic	Feedback
Do you have any feedback to share on the policy considerations outlined in the August 29, 2024, letter from the Minister of Energy and Electrification to the IESO?	No specific comment, the policy considerations are aligned with the previous communications from MoE and IESO.

Draft LT2 Energy RFP and Contract

Do you have any feedback regarding the recently posted LT2(e) RFP?

Our main concern is the **lack of clarity in the definition of Prime Agricultural Areas (PAA)**. The LT2(e) RFP refers to the PPS, which has a broad definition. We understand the IESO has the intention to adjust the definition to align it to prime agricultural areas *as designated by the municipality's or Northern planning board's Official Plan*. Even if this definition is amended, the IESO should clearly identify the reference points for different situations:

- For projects on organized lands, official plans don't always have clear guidance, and upper- and lower-tier municipalities can contradict each other. Which one would prevail?
- For projects on unorganized lands, which entity would eventually determine if a site is on a PAA? Would it be MNR or MMAH?
- On crown lands and indigenous lands, who determines if the land is within a PAA?

Also, how can Proponents prove to the IESO that the Project Site is not on a PAA? Will it be a self-declaration based on exchanges with the local governing body? Will it be a prescribed form? We recommend that within the MSR prescribed form, the municipality or other applicable governing body confirms if the Project Site is within a PAA or not.

Developers need certainty upfront to understand the suitability of a land before spending time and money trying to develop a project on that land.

Regarding the **Registration phase**, the IESO should provide more information, in particular:

- On the Registration Fee: is it per Proposal or per Proponent?
- On the binding aspects of the information submitted at that stage, for example for maximum contract capacity, proposed connection point or Proponent – these aspects might change in the last few weeks before the proposal submission
- On the timing: how long before the Submission Date will the Registration happen?

Regarding Stage 5 of the Proposal Evaluation (Deliverability Test Results Assessments), we don't understand why, in

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	<p>the case of Conflicting Crown Land Projects, the Proposal that is ranked lower will not be evaluated. What if the most competitive project is not deliverable, and a smaller one could have been deliverable but has been already eliminated? We believe that all proposals and PQ alternatives should be ranked, and that as soon as a Proposal enters the Offer List, all remaining Proposals and PQ alternatives of Conflicting Crown Land Projects should be eliminated.</p> <p>Neoen will share more complete feedback and/or redline to the LT2(e) RFP shortly.</p>
Do you have any feedback regarding the recently posted second version of the LT2(e) Contract?	Neoen will share complete feedback and/or redline to the LT2(e) Contract shortly.
Do you have any feedback to share on the proposed Rated Criteria for the LT2(e) RFP?	No comment – the proposed rated criteria are aligned with the policy considerations and our expectations given recent communications from IESO.
Do you have any feedback to share on the proposed mandatory requirements for the LT2(e) RFP, including Municipal and Indigenous Support Resolutions requirements as well as requirements for siting projects on Crown Land?	It is pretty clear, but it would be helpful if the IESO could confirm in a table the different requirements for each type of land (crown land, private land in organized territory, private land in unorganized territory, indigenous land)
Do you have any feedback to share on the Indigenous and Community Engagement requirements for the LT2(e) RFP?	It would helpful for Proponents to have a template from the IESO for the Pre-Engagement Confirmation Notice.

Key Themes from Recent Stakeholder Feedback

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Do you have any feedback to share on the IESO responses to recent stakeholder feedback?	No comment

General Comments/Feedback