

Feedback Form

Long-Term 2 RFP – September 12, 2024

Feedback Provided by:

Name: Aman Maharaj

Title: Senior Developer

Organization: Sweb

Email: aman.maharaj@sweb.energy

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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
Do you have any feedback to share regarding the updated Preliminary Connection Guidance document?	Section 7 of the Connection Guidance document indicates that the HONI Station and Feeder Capacity Calculator can be used to determine how much generation can be added at each bus or station. However, a publicly available map showing location and names of feeder lines are not available. SWEB advises that the IESO work with HONI to develop an interactive system map of the feeder lines so proponents can more efficiently utilize the HONI calculator.
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?	
Do you have any feedback on the types of information that you would like to see in the LT2 Capacity RFP Guidance Document?	

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?	

Draft LT2 Energy RFP and Contract

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

Can the IESO provide clarity as to if the Indigenous Partners on a proposed project need to be identified at Registration? SWEB recommends that Proponents should have the ability to add Indigenous Partners as a Control Group Member after Registration. Developing partnerships with Indigenous communities take time. With the Registration Form being required prior to Proposal Submission, the IESO may be unduly shortening the time that Indigenous communities have to determine their partnership desires and capabilities. SWEB believes that the IESO will benefit from allowing Proponents up until bid submission to work with potential Indigenous partners to finalize these partnership arrangements on projects.

The RFP indicates that a maximum contract capacity needs to be stated at Registration. Does this mean that the contract capacity at bid submission can be less than the maximum contract capacity indicated at Registration?

The LT1 RFP indicated minimum public engagement requirements that a project needed to meet (e.g websites, public meetings, appropriate notifications, etc.). In the LT2(e) RFP, it seems that engagement is covered through a Pre-Engagement Confirmation Notice, but the amount of engagement around the proposed projects is vague. The IESO needs to provide clarity on if there are minimum engagement requirements, or if it is up to the Proponent and Municipality to create a suitable engagement plan.

The RFP states that Non-Rooftop Solar Projects may not be located on Prime Agricultural Areas. It further states that projects that are not Non-Rooftop Solar Project that are located on Prime Agricultural Areas will require an Agricultural Impact Assessment (AIA). Can the IESO clarify that wind energy projects located on Prime Agricultural Areas will require an AIA?

SWEB advises that the timelines that the IESO is proposing for LT2(e) may exclude wind energy projects that are in the early stages of development. Wind energy projects require a minimum of one year of wind resource testing, to ensure adequacy of resource, which many Proponents are just now beginning. Furthermore, many Proponents have faced delays in approvals from the MNR to permit wind

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	<p>resource testing equipment deployment. SWEB recommends that the IESO consider delaying bid submission to Q4 of 2025 to allow these projects to be eligible to participate.</p> <p>The RFP states that a Control Group Member of the Proponent cannot submit more than 10 Proposals. based on the RFP, SWEB assumes that an Indigenous Community with an equity stake in the project is defined as a Control Group Member and is therefore limited to the 10 Proposal limit. Can the IESO advise on what the protocol is for an Indigenous Community Control Group Member who may be partnered with numerous developers?</p> <p>The RFP states that to meet evidence of access requirements, the Proponent must submit a letter to the IESO signed by the title holder stating that the Proponent has the right to acquire the Properties or has the contractual right to build, operate, and maintain the Long-Term Energy Project. SWEB advises that the IESO consider a standard form or letter that the title holder will need to sign indicating this authorization.</p> <p>Can the IESO clarify if the Qualifying Project nameplate capacity of a minimum of 5MW is measured in AC or DC?</p>

Do you have any feedback regarding the recently posted second version of the LT2(e) Contract?

The definition of Expiry Date is incorrect. SWEB believes the correct date should be April 30, 2050.

SWEB recommends that the IESO revises the definition of Prime Agricultural Area. This definition should reflect local municipality zoning bylaws or official plans, not the Provincial Policy Statement.

Section 2.1b, SWEB asks for clarity on what constitutes as "any material respect". Proponents should have the ability to change aspects of the design of the facility post bid submission provided all contractual requirements are met.

The IESO should consider adding a mechanism that allows adjustment of the annual average imputed production factor within the first three years of the term. Having this mechanism could help reduce the risk for Proponents developing intermittent generation resources and could encourage projects with limited testing windows to participate in this procurement round.

The IESO should consider the ability for Proponents to invoke Force Majeure should a transmitter or local distribution company request excessive costs for network upgrades. Proponents are asked to bid on projects without a firm understanding of network upgrade costs. Proponents should have a way to effectively manage this risk.

Section 15.4, SWEB advises a revision from 2 days to 5 days to allow for arranging of inspection of the facility.

SWEB recommends that the IESO consider a term of 25 years instead of 20 years. A 25-year term better aligns with life cycles for wind energy projects and can help the IESO achieve more competitive bid prices.

SWEB would like IESO to revisit the equations in Exhibit F (Non-Performance Charges) to consider the previously addressed concerns on the applicability of a rolling average methodology of calculation, the accuracy of using the term THp in the NPC equation as opposed to SMHm, and that the equations presented do not seem to mirror those earlier provided (June 2024 Engagement, Slide 48). SWEB recommends IESO to provide example calculations (based

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	<p>on the Contract equations) in future engagements to be able to fully comprehend and analyze the potential charges.</p> <p>SWEB would like IESO to revisit the equations in Exhibit J (Page 111) for the DARTAh adjustment to properly implement brackets to avoid confusion. In addition, it would be appreciated if IESO would provide examples in future engagements of how the IFDFh would be applied to ensure the accuracy of the calculation methodology presented.</p> <p>SWEB is awaiting more information on IESO's treatment of excess deemed revenues and DARTA, SWEB does not believe allowing suppliers to keep a share of excess deemed revenues in exchange for opting out of DARTA is appropriate given that the two products treat different concerns and risks. While more information is needed to fully comprehend the matters, SWEB believes that such treatment may allow Proponents to have disproportionate advantages.</p> <p>SWEB would like IESO to provide any available information on Environmental Attributes, if potentially any, to ensure all Proponents are accounting for them competitively.</p>
<p>Do you have any feedback to share on the proposed Rated Criteria for the LT2(e) RFP?</p>	<p>SWEB advises that the IESO should consider awarding criteria points to projects that utilize non-emitting generation resources, such as wind and solar.</p>
<p>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?</p>	<p>Can the IESO provide clarification on what combination of Municipal Support Resolution or MNR Crown Land Site Report may be required for a single project that is located on both private and crown lands? Will MSR and a MNR Crown Land Site Report (and subsequent MNR approval) be required for the project Proposal?</p>

Topic	Feedback
Do you have any feedback to share on the Indigenous and Community Engagement requirements for the LT2(e) RFP?	

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?	SWEB is awaiting IESO responses to recent stakeholder feedback (dated August 9, 2024).

General Comments/Feedback