

Feedback Form

Long-Term 2 RFP – October 22, 2024

Feedback Provided by:

Name: Julien Wu

Title: Director, Regulatory Affairs

Organization: Brookfield Renewable

Email: [REDACTED]

Date: Nov 8 2024

Following the LT2 RFP October 22, 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](#).

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 November 8, 2024.

LT2 RFP Multiple Submission Window Approach

Design Considerations	Feedback
Do you have any feedback regarding the multiple submission window approach being proposed for LT2?	
Specifically: Do you have any comments around the proposed timeline for the first submission window?	
Do you have any comments or information for the IESO to consider in relation to the way that procurement documents will be updated and shared between submission windows?	
Do you have any comments around obtaining Indigenous Support Confirmations and Municipal Support Confirmations across submission windows?	
Do you have any comments around the consideration of overall targets and allocation between submission windows?	
Deliverability	Feedback
Do you have any comments for the IESO to consider regarding deliverability under the new windowed approach?	

Ministry of Natural Resources Presentation:

Renewable Energy on Crown Land Considerations	Feedback
Do you have any comments in relation to the information presented by MNR regarding Crown Land considerations for renewable energy projects?	

Predevelopment Roadmap	Feedback
Do you have any comments regarding the information presented by MNR regarding the predevelopment roadmap?	

General Comments/Feedback

Brookfield Renewable appreciates the opportunity to provide comments.

We generally support the windowed approach as proposed by the IESO for the LT2-RFP. However, we ask that the IESO not neglect or delay the design, stakeholdering, and timing of the LT3-RFP, as well as other IESO-led procurement streams targeting existing resources. We understand that the LT2-series of RFPs will focus on the procurement of new energy and capacity resources, and that the LT3-RFP will be the first opportunity for existing resources to offer fully repowered projects. In this context, we agree that the procurement of new resources via the LT2-RFPs is a priority for Ontario to meet its growing power needs—as demonstrated by the IESO’s recent forecast revision. However, this new and incremental supply must stand side-by-side with existing resources to fully shore up Ontario’s future resource adequacy requirements. In this sense, the LT3-RFP, the MT-series of RFPs, and the Northern Hydro Program all require and deserve timely and meaningful stakeholdering to ensure that existing resources have the opportunity to re-contract, extend their useful-life, repower, expand, and even add dispatchability through fairly priced contracts and competitive processes. While we fully support the addition of new supply to the grid, the energy, capacity, and dispatchability of existing resources remain the most reliable source of supply that Ontario can count on. In most if not all cases, these existing resources have readily access to infrastructure (e.g., transmission) and local support that can enable a competitive and rapid repowering or expansion process. In short, we ask that the IESO not lose sight of the existing value and incremental benefits achievable from existing resources.

With regards to the MNR’s presentation, we support the IESO’s position to adopt a flexible approach in how the AORs can be transferred, in particular to special purpose vehicles. To be clear, the use of special purpose vehicles is in fact customary in the development industry to ringfence risk, and to manage project and financial considerations. We ask that the IESO and the MNR clearly and quickly assure proponents that AORs would be transferrable in a flexible manner, including but not limited to special purpose vehicles.