

Feedback Form

Long-Term 2 RFP – October 22, 2024

Feedback Provided by:

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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
<p>Do you have any feedback regarding the multiple submission window approach being proposed for LT2?</p>	<p>We support the use of multiple submission windows for LT2 and look forward to receiving more details on each so that we can plan accordingly.</p> <p>We support the IESO’s stated objective to make adjustments between windows to incorporate lessons learned. To that end, we encourage the IESO to continue its robust stakeholder engagement throughout LT2 to ensure lessons from industry can be captured and so that we can respond to the IESO’s evolving objectives.</p> <p>Can the IESO clarify how many submission windows will apply to the capacity stream? Can the IESO please clarify how the windowed approach to LT2 will impact the stated procurement targets / timing for LT3 and LT4?</p>
<p>Specifically: Do you have any comments around the proposed timeline for the first submission window?</p>	<p>No concerns</p>
<p>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?</p>	<p>We believe the IESO should provide the opportunity for stakeholders to provide feedback and adjust the RFP and contract between windows. This could take the form of the current engagements the IESO has been conducting with stakeholders. At minimum, we would like to see a draft RFP and Contract with a 2-3 month feedback period.</p> <p>We also believe the IESO should open up communications between windows, beyond a QA.</p> <p>IESO should provide line of sight into possible changes between windows so we can prepare to respond based on any new criteria or eligibility.</p>
<p>Do you have any comments around obtaining Indigenous Support Confirmations and Municipal Support Confirmations across submission windows?</p>	<p>Regarding the Municipal Support Confirmation form: we encourage the IESO to emphasize Item B in the “Guidance for Municipalities” from LT1 – Prescribed Form – Evidence of Municipal Support. This may include an explicit checkbox in the form (“This Evidence of Municipal Support does not waive the need for applicable permits, approvals, or requirements laid out by applicable laws and regulations, including local zoning and by-laws.”).</p>

	<p>We also urge IESO to accept municipal support resolutions as far back as LT1 to apply to all LT2 submissions and at the very least one municipal support resolution to be accepted for all windows of LT2 in the case that a proponent resubmits or delays submission to a different window.</p> <p>We encourage the IESO to continue to educate municipalities on the procurement. Many of them have outdated policies and IESO can play a role as a trusted partner in understanding these projects and the LT2 process.</p>
Do you have any comments around the consideration of overall targets and allocation between submission windows?	The IESO should consider a target range to provide themselves the full flexibility to contract high-quality projects that meet system needs.
Deliverability	Feedback
Do you have any comments for the IESO to consider regarding deliverability under the new windowed approach?	Changes to the Guidance Document between windows based on procurement adds risk to projects and having them ready in time for RFPs. The longest lead time possible to any necessary updates would help reduce risk.

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?	We need more information on timelines and clarity on process. We need the approval of application to happen in a timely manner in order to have projects ready for the RFPs Reinforce the existing 500 kV system between Essa TS and Hanmer TS. Able to provide significant increases in Northward flow (1500MW), accommodating the forecast up to year 2044 (under firm demand forecast), and 2029 (under potential demand forecast). Where small overnight needs are still present. Provides significant benefits in terms of enabling more generation in Northern Ontario.

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

General Comments/Feedback

- Expiry Date in Contract is listed as 4/30/2051 and in the RFP is listed as 4/30/2050, the IESO should please clarify this.
- 2.2.j.i in the RFP indicates the Proposal Security must be converted into the Completion & Performance Security. 5.4.b seems to contradict this requirement.
- 2.15.a – We believe this may disincentivize emitting resources from taking advantage of government programs that support emission reductions, for example grants for emerging technologies such as Carbon Capture and Storage and hydrogen.