

# 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](mailto: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>	<ul style="list-style-type: none"> <li>- This approach is overall a positive solution, as it provides valuable visibility and stability for future investments. Having multiple windows allows developers to plan and allocate resources more effectively, knowing there will be predictable opportunities to participate.</li> <li>- This structure also encourages developers to refine and optimize their proposals between windows, leading to potentially higher-quality projects in the long term.</li> </ul>
<p>Specifically: Do you have any comments around the proposed timeline for the first submission window?</p>	<ul style="list-style-type: none"> <li>- Ensuring a final decision is made for the first window timeline is critical.</li> <li>- While Q3 appears to be a reasonable target for this first window, the sooner IESO can lock down a final decision date, the better it will facilitate planning and coordination with stakeholders.</li> </ul>
<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>	<ul style="list-style-type: none"> <li>- As mentioned during the Webinar, it is crucial that “the contract and RFP remain substantially the same across windows to provide certainty, transparency, and predictability for proponents.” Maintaining this consistency is key for developers to plan long-term strategies confidently.</li> <li>- If updates to procurement documents are required, we would recommend that the IESO to provide clear and early communication about these changes. This will allow proponents sufficient time to adjust their siting and bidding strategies, consult with financial partners, and revise costing assumptions as needed. Early notification will help reduce uncertainty and align developers’ approaches to match IESO’s evolving guidelines.</li> </ul>
<p>Do you have any comments around obtaining Indigenous Support Confirmations and Municipal Support Confirmations across submission windows?</p>	<ul style="list-style-type: none"> <li>- We understand that this question relates to resubmitted projects in subsequent windows.</li> <li>- Thus, for such projects, it would make sense to allow proponents to use the same Indigenous and Municipal Support Confirmations. In fact, this is essential as otherwise the timeline proposed with proposal evaluation period ending in Q1 and the next submission in Q3 the same year might now allow sufficient time to obtain such Support Confirmations from Indigenous partners and municipalities.</li> <li>- Also, there is a potential issue if minor project modifications occur between windows. In such cases, clarification is needed on whether updated support confirmations would be required or if existing approvals would remain valid.</li> <li>- Like in the previous comment, ensuring continuity here will save time and help developers proceed with confidence throughout the various windows to improve project competitiveness if not awarded.</li> </ul>

<p>Do you have any comments around the consideration of overall targets and allocation between submission windows?</p>	<ul style="list-style-type: none"> <li>- It is understood that the target for LT2 (the 4 windows) should reflect the 2035 energy needs in Ontario, which were included in the previous LT2/LT3 and LT4 procurement nearing 5,000 MW.</li> <li>- As mentioned in previous feedback, it seems essential that the IESO clarifies the targets in MW or TWh for both the Capacity and the Energy streams.</li> <li>- Targets should be communicated with enough detail and provided well in advance of each window to allow developers to align their strategies accordingly.</li> </ul>
<p><b>Deliverability</b></p>	<p><b>Feedback</b></p>
<p>Do you have any comments for the IESO to consider regarding deliverability under the new windowed approach?</p>	<ul style="list-style-type: none"> <li>- Clarity well ahead of the procurement regarding interconnection, based on project location and capacity, is crucial to submit the most competitive offers.</li> <li>- It is acknowledged that the IESO does not want to perform an RFQ prior to the Proposal Submission Deadlines. Yet, it is highlighted that having a process or an intermediate assessment to estimate interconnection constraints for projects before bid submission would be highly beneficial and specifically in the new windowed approach as one assessment could benefit a developer for various windows thus focusing on improving other aspects of the projects to increase their competitiveness. While we understand this would represent a significant workload for the IESO and HONI, one option to manage the volume of assessment requests is to require developers to pay a fee. By implementing such a fee, the IESO would ensure that only serious and well-funded developers submit requests, leading to high-quality and competitive bids with the most accurate interconnection information. This approach would be advantageous for all parties, including ratepayers, as it would provide the IESO with additional resources to conduct the necessary studies and act as a natural filter to avoid assessing non-feasible projects.</li> </ul>

## Ministry of Natural Resources Presentation:

<p><b>Renewable Energy on Crown Land Considerations</b></p>	<p><b>Feedback</b></p>
<p>Do you have any comments in relation to the information presented by MNR regarding Crown Land considerations for renewable energy projects?</p>	<ul style="list-style-type: none"> <li>- The various constraints and limitations are well explained but providing stakeholders with a clear map gathering the mentioned limitations could contribute to the clarification of the allowed areas on Crown Lands for renewable energy projects.</li> <li>-Regarding the constraint related to “pre-existing or pending Crown land tenure,” we believe that legacy exclusive licenses hinder the competitiveness of current RFPs. These longstanding exclusivities create an imbalance, complicating siting strategies for new entrants who aim to develop</li> </ul>

	<p>projects on Crown land with ambitious timelines and competitive bidding strategies that could benefit the entire system. In contrast, some stakeholders are positioned to benefit solely from exclusivities granted years or even decades ago. Therefore, we advocate for the cancellation of exclusive licenses for Crown land tenures to create a more transparent and equitable environment for all proponents interested in Crown land-based renewable energy projects.</p> <p>-If the Ministry opts to retain these exclusive licenses, a fair compromise would be to limit their application until the first submission window only. Alternatively, developers with Crown land tenures could be required to submit a project proposal in the first LT2 window.</p> <p>- Additionally, based on the proposed structure of the predevelopment roadmap, it appears that MNR's commitment to granting exclusivity on the project land will only follow specific studies, consultations, and an assessment of the project proposal by the IESO. This approach promotes competitiveness, reducing overall system costs. Thus, it seems both logical and consistent to ensure fair competition across the entire sector rather than having already designated areas as exclusive while leaving others open.</p> <p>- It would be beneficial if the IESO or MNR could share with the proponents the areas restricted under the Far North act.</p> <p>- Also, it would be of great help if the IESO or MNR could share with the proponents the areas with existing authorizations or dispositions under the Public Lands Act, Aggregate Resources Act, Oil Gas and Salt Resources Act, or Mining Act that would prohibit Development.</p> <p>- Finally, in the vein of providing a clear and fair view of the Crow Land considerations for renewable energy projects, it would help proponent if the IESO or MNR could share the areas with pre-existing or pending Crown land tenure that are disposed of or incompatible for new renewable energy projects.</p>
<p>Do you have any comments regarding the information presented by MNR regarding the predevelopment roadmap?</p>	<p>- The proposed roadmap seems quite intensive for what is intended to be a pre-development phase. At this early stage, developers are only beginning to assess site feasibility, and requiring them to complete a "predevelopment project submission" along with "consultation and other requirements" may be overly burdensome and time-consuming, especially given that site exclusivity is not yet secured. This could be seen as a fair and manageable approach only if it applies uniformly to all Crown lands, rather than having favored areas that have retained exclusivity under past regulations. In other words, this competitive approach, which helps reduce system costs, can only be effective if all stakeholders operate on an equal footing.</p> <p>- With the anticipated rise in applications for meteorological masts (met masts) on crown lands, will the Ministry of Natural Resources (MNR) review the specific APRD</p>

requirements for the met masts? Currently, under the blanket APRD policy, even the erection of a simple, temporary tilt-up met mast could necessitate numerous studies, reports, consultations, and approvals, potentially extending the process to over a year. One of the solutions might be to create a separate class for met masts under APRD process to simplify the permitting process.

- Could the Ministry of Natural Resources (MNR) clarify if the documents required for the Initial Predevelopment Project Submission for a met mast installation need to include information solely about the met mast, or if they must also address potential future wind farm developments at the proposed location?
- Under predevelopment process Step 2 Section 4 bullet point 6, MNRF cites section 5.2.3.1 of the APRD as applicable significant natural features that developers should include in the Site Report. However, as per APRD, section 5.2.3.1 is only applicable to "Renewable energy testing projects on Crown land where construction or modification of a transportation system is required". Does it mean that the predevelopment process aims to apply this requirement to the crown lands where construction or modification of a transportation system is not required, thereby increasing the approval process complexity?
- Under predevelopment process Step 3 Paragraph 4, MNRF states the areas that APRD does not allow for RE predevelopment projects to be located in. This is in line with APRD's 5.2.3.1, however, this section of APRD only applies to "Renewable energy testing projects on Crown land where construction or modification of a transportation system is required". Does it mean that the predevelopment process aims to restrict the areas of installing met masts further for the crown lands where construction or modification of a transportation system is not required?
- In the MNR's document "Renewable Energy Predevelopment Projects on Crown Land" in Step 2 Section 4 (Site Plan) bullet point 10 it states that the Site Plan submission should include "all known natural features" while citing 5.2.3.1 of the APRD process. Provided that section 5.2.3.1 of APRD may entail a wide range of requirements in case the construction of a new or modifications to an existing transportation system is required, could we seek clarification if MNR expects the proponents to complete and submit all of the applicable reports and assessments in the initial submission?
- Additionally, having a specific timeline or clear expectations for processing times within the roadmap is essential for planning and efficiency.
- Lastly, a commitment from the Ministry of Natural Resources, ensuring that it can assess and process development applications within timelines aligned with the RFP windows, would be highly beneficial.

## General Comments/Feedback

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