

# Feedback Form

## Long-Term 2 RFP – December 12, 2024

### Feedback Provided by:

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Date: January 9<sup>th</sup>, 2025

Following the LT2 RFP December 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 [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 January 10, 2024.**

## Overview of directive and LT2 updates

Question	Feedback
<ul style="list-style-type: none"><li>Do you have any comments for the IESO regarding the proposed targets for the first submission window and/or the range of targets proposed for future windows?</li></ul>	
<ul style="list-style-type: none"><li>Do you have any comments for the IESO to consider regarding the proposed timeline for the first submission window?</li></ul>	

## LT2 (c) – High Level Overview of RFP and Contract

Question	Feedback
<ul style="list-style-type: none"><li>Do you have any comments for the IESO regarding the newly proposed rated criteria related to duration?</li></ul>	

## LT2(e) and LT2(c) RFPs and Contracts

Question	Feedback
<ul style="list-style-type: none"><li>Do you have any comments related to the treatment of support confirmations across windows?</li></ul>	
<ul style="list-style-type: none"><li>Do you have any comments related to the proposed new requirement for evidencing that a project is on Unincorporated Territory?</li></ul>	
<ul style="list-style-type: none"><li>Do you have any comments regarding the proposed early COD multiplier?</li></ul>	

## Deliverability Guidance

Question	Feedback
Do you have any comments around the Deliverability for Windowed Approach?	
Do you have any general comments you would like to share around the deliverability guidance or test methodology information presented for window 1?	

### General Comments/Feedback

1. Would the IESO consider additional rated criteria requiring thermal proponents to submit a fuel management plan and award rated criteria points if proponents demonstrate ability to meet must-offer obligation while proposing the most cost-effective solutions?
2. Thermal proponents must secure firm pipeline capacity with TransCanada Pipeline (TCPL) and necessary distribution assets with Enbridge Gas Distribution (EGD) throughout the contract term to fulfill the must-offer obligations of the LT2(c) Contract. These assets are sized according to the Maximum Daily Requirement (MDQ). Although the must-offer obligation specifies a 16-hour continuous delivery for five consecutive days, the nature of the service agreements with TCPL and EGD requires proponents to contract for assets that support 24/7 operation.

Since 20% of the Fixed Capacity Payment (FCP) will be adjusted for inflation and there is no fuel cost recovery mechanism, thermal projects face significant financial risks from unpredictable fuel management costs, which are beyond the control of the proponents.

Given the financial exposure due to fluctuating fuel management costs, would the IESO consider implementing a mechanism that allows project proponents to recover fuel management costs during the contract term?