

Feedback Form

Long-Term 2 RFP – December 12, 2024

Feedback Provided by:

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Date: January 10, 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 by January 10, 2024.

Overview of directive and LT2 updates

Question	Feedback
<ul style="list-style-type: none"> 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? 	<p>Boralex is appreciative of IESO for identifying the proposed targets for all four windows as it provides market certainty. A continued roadmap of procurement targets for future LT3, and 4 rounds would also be appreciated.</p>
<ul style="list-style-type: none"> Do you have any comments for the IESO to consider regarding the proposed timeline for the first submission window? 	<p>The first LT2(e) window being in July is very accelerated. In order to allow for sufficient time to engage with municipalities, Indigenous communities and local residents, we ask the IESO reconsider the submission date to be later in 2025, preferably November timeframe. In addition, there is uncertainty around the MNR Crown Land Site Report and what maybe required. If the Crown Land Site Report process is like the MET tower approval process proponents would not be able to meet a July RFP submission deadline which would significantly reduce the number of projects and the competitive nature of the RFP. A July RFP submission date also limits the time and seasonality to collect data and perform necessary studies. While we understand Ontario’s urgent energy needs and the desire to have projects move in an expeditious manner, we believe that a better alternative to ensure projects come online in an expediated manner is to the early COD multiplier. By delaying the RFP submission deadline to November and using the early COD multiplier it will allow for a larger number of high quality projects in the first submission window.</p>

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

Question	Feedback
<ul style="list-style-type: none"> Do you have any comments for the IESO regarding the newly proposed rated criteria related to duration? 	<ul style="list-style-type: none"> Boralex suggests reverting back to the previous 4 consecutive hours of duration instead of the new increase to 8 hour duration for capacity projects. We recommend using rated criteria points to incent longer duration projects, for example we would suggest the following; <ul style="list-style-type: none"> 3 points for non-electricity storage facility with 12 or more hours of duration. 2 points for electricity storage facility with duration of 12 or more hours of duration. 1 point for non-electricity storage or electricity storage facility with duration of 8 to 12 hours of duration.

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

Question	Feedback
<ul style="list-style-type: none"> Do you have any comments related to the treatment of support confirmations across windows? 	<p>Boralex is supportive of allowing municipal support confirmations (MSC) remain valid across all LT2 RFP submission windows with the new attestation confirming that the MSC has not been revoked, amended or changed.</p>
<ul style="list-style-type: none"> Do you have any comments related to the proposed new requirement for evidencing that a project is on Unincorporated Territory? 	<p>Boralex is supportive of the new requirement of a letter signed by a registered Land Use Planner.</p>
<ul style="list-style-type: none"> Do you have any comments regarding the proposed early COD multiplier? 	<p>Boralex is supportive of the proposed early COD multiplier.</p>

Deliverability Guidance

Question	Feedback
Do you have any comments around the Deliverability for Windowed Approach?	There is a concern regarding the impact LT2 W1(e) projects will have on the deliverability of LT2 W1 (c) projects. Because the LT2 W1 (e) projects will be unknown the results could greatly impact the deliverability of the capacity stream. We recognize that the IESO will not be done their review of LT2 W1(e) projects but would it be possible for the IESO to provide a list of projects that were submitted in to LT2 W1 (e) prior to the LT2 W1 (c) deadline so proponents can due their own due diligence and potentially reevaluate project sizes if needed.
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

Boralex is generally supportive of the rated criteria points but stresses that flexibility will be important past the first two windows of LT2. While focusing priority points in Northern Ontario will work for the beginning of LT2, due to limited capacity, there will be a point that the North will not be able to support more proposed projects in the future windows. We think some of the rated criteria might have to be revisited during Windows 3 and 4, including priority points in Northern Ontario districts and priority points for not being on prime agricultural land.