

Feedback Form

Long-Term 2 RFP – December 12, 2024

Feedback Provided by:

Name: Gordon Verok

Title: Director of Development

Organization: Horizon New Energy

Email: [REDACTED]

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
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?	Horizon New Energy applauds the IESO and the Ministry of Energy for updating the proposed procurement targets to reflect the ongoing updates to projected future energy use/consumption. The updated targets better reflect recent updates to the IESO future outlook.

Question	Feedback
<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>Horizon New Energy is firmly opposed to the proposed timeline for the first submission window. Given the lack of an efficient process to approve met tower locations on crown lands, the requirement to have a Municipal Support Resolution prior to an RFP submission, and the various updates on transmission capacity and interconnection options we feel that a 2025 year-end submission is prudent to a successful Window 1 procurement.</p> <p>Horizon New Energy feels that the COD requirements associated with the first submission window will not be impacted by a 2025 year-end submission deadline and that this timeline would allow for a more refined and robust competitive landscape.</p> <p>A July 2025 submission deadline would likely result in higher bid prices due to lack of submission-ready projects, frustrated/exhausted municipalities and Indigenous groups due to the fatigue of being inundated with developer requests, and riskier overall projects being awarded PPAs due to a lack of time to de-risk key project workstreams.</p> <p>Finally, due in large part to the IESO preferring projects located in the North (as defined by the RFP documents), the spring/summer of 2025 is considered critical in terms of completing site visits, constructability analyses, field studies, etc. Many of these tasks are not physically possible in the winter. A July 2025 submission deadline makes this critical upcoming site visit window irrelevant to projects in the first submission window, further increasing risk.</p> <p>For the benefit of the LT procurement process and Ontario ratepayers we urge the IESO to adjust the timeline for the first window to reflect a year-end 2025 submission deadline.</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? 	Horizon New Energy recommends that the minimum duration for capacity resources be amended to four (4) consecutive hours and that rated criteria points be awarded to proposals that include duration capabilities exceeding four (4) consecutive hours or more.

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

Question	Feedback
Do you have any comments related to the treatment of support confirmations across windows?	N/A
Do you have any comments related to the proposed new requirement for evidencing that a project is on Unincorporated Territory?	N/A
Do you have any comments regarding the proposed early COD multiplier?	N/A

Deliverability Guidance

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

General Comments/Feedback

Horizon New Energy strongly feels that the IESO should update the proposed submission deadline to year-end 2025 to ensure the window 1 procurement is as competitive as possible, resulting in the

greatest benefit for Ontarians. Given the fact that there are 4+ years between PPA award and the required COD, coupled with early COD incentives, we are certain that there is ample time to design, consult, permit, construct, and achieve commercial operations with a year-end 2025 submission deadline.

Horizon New Energy supports using July as a procurement submission deadline for Windows 2 through to the end of LT2 but feels that Window 1 requires additional time due to the reasons stated above.