

Feedback Form

Long-Term RFP – March 10, 2022

Feedback Provided by:

Name: Anna Crolla

Title: Engineering Specialist, Energy and Cropping Systems

Organization: Ontario Ministry of Agriculture, Food and Rural Affairs

Email: [REDACTED]

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Following the March 10th public webinar on the Long-Term RFP, the Independent Electricity System Operator (IESO) is seeking feedback from participants on a variety of elements to help further inform the draft RFP and Contract, including: term length, revenue streams, deliverability process and Draft RFQ.

The referenced presentation can be found on the [Long-Term RFP webpage](#).

Please provide feedback by March 17, 2022 to engagement@ieso.ca.

Please use subject header: **Long-Term RFP**. To promote transparency, this feedback will be posted on the [Long-Term RFP webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.

General Comments/Feedback

Thank you for the opportunity to provide comments regarding the objectives of IESO's proposed fall 2022 launch of a Request for Proposal (RFP) for delivering at least 1,000 MW to address multiple reliability needs. The Long-Term RFP (LT RFP) will seek resources that can be in service between 2026 and 2028.

In reviewing the LT RFP objectives and stakeholder feedback, we don't see any explicit mention of biogas, nor any biogas stakeholders listed in consultation sessions. We therefore would like to bring to the IESO's attention the opportunities that could be provided from the Ontario biogas industry to meet the needs identified under the LT RFP. Currently in Ontario there are 38 agri-food biogas facilities, typically scaled between 100 to 750 kW under FIT contracts, that generate over 20 MW of combined electricity going to the grid and demonstrating 24/7 electricity and heat outputs. Newly proposed digesters are being built for Renewable Natural Gas (RNG) production at the equivalent of 1-2 MW electrical size. If similar facilities were constructed to produce electricity with daily biogas storage to meet peak demands, the biogas sector could be well-positioned to support the needs identified in the IESO LT RFP. A biogas facility can store gas on a daily basis, and using existing technology systems could generally achieve 12 hours of storage which should be suitable to meet daily peak electrical demands.

The biogas industry is well positioned to jump into a short-term deployment (< 2 years) window due to the streamlined approvals process and strong local sector. The LT RFP identifies a minimum project size of 1 MW which could work nicely with current Regulated Mixed Anaerobic Digestion Facilities (RMADF) rules (O. Reg. 267/03 under the Nutrient Management Act, 2002). Changes to the RMADF rules in 2021 mean that biogas system can achieve all necessary approvals within 6 months. The updated rules facilitate development of both new systems, and expansion of existing systems. Also, 1 MW is generally the same size as the entry-point for RNG, so projects that couldn't line up cost-effective pipeline connections for RNG could pursue Small-Scale LT1 electricity generation projects.

Agri-food biogas facilities can contribute to the need for electrical grid stability, while using municipal organic wastes, agri-food resources, returning nutrients to farms, reducing GHGs through better feedstock management, producing clean energy, stimulating economic opportunities and creating technical jobs in rural areas.

We look forward to hearing more about the development of the LT RFP and would be happy to provide further information on the potential opportunities for the Ontario agri-food biogas industry in helping the IESO achieve its goals under this new initiative.