

# Feedback Form

## Long-Term RFP – June 9, 2022

### Feedback Provided by:

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Title: interested citizen

Organization: [Click or tap here to enter text.](#)

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Date: June 20, 2022

Following the June 9<sup>th</sup> public webinar on the Long-Term RFP, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the additional procurement mechanisms, as well as on proposed revenue streams.

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

**Please provide feedback by June 20, 2022 to [engagement@ieso.ca](mailto: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.

## Additional Mechanisms: Overview and Linkages

Topic	Feedback
<p>Please provide any feedback on the IESO's overview of the Additional Mechanisms (Expedited Process, Same-Technology Expansions, FCA) and the linkages between acquisition mechanism (e.g., Expedited Process and LT1 RFP, or LT1 RFP and LT2 RFP)</p>	<ul style="list-style-type: none"><li>- Question about the Same-technology expansions. If an existing Wind project has the capacity to deliver additional energy to the system, i.e. the turbines are rated at 4.2MW but for an existing project they are operating at 3.45MW under Noise Reduction Mode 2, could they apply to deliver additional electricity to the grid, without revisiting noise requirements/ incurring additional environmental assessments? Would they be required to use the 2016 Revised Noise Protocols??</li><li>- If REA conditions have not been met, i.e. noise emission/ imission testing is still outstanding, or complaints have not been addressed, the proponent/ contractor should not be allowed to apply for a new contract or expansion. Past performance is the best indicator of future performance.</li></ul>

## LT1 RFP and Expedited Process: Mandatory Requirements and Rated Criteria

Topic	Feedback
<p>Please provide any feedback on the Mandatory Requirements and Rated Criteria proposed for the LT1 RFP and Expedited Process.</p>	<ul style="list-style-type: none"> <li>- The “Requirements” are not really requirements if a proponent is allowed to simply hold 1 public meeting and post a Community Engagement Plan before applying.</li> <li>- There is no requirement for a public question &amp; answer which should be required.</li> <li>- Must obtain a Municipal Council support Resolution but..... may be only after contract execution – so municipalities can be overrun once again.</li> <li>- Same goes for Indigenous communities who only need to be informed even if the proponent is required to reconfirm support after contract execution. This is exactly what happened in 2015/16 and created a great deal of trouble for everyone. Not sufficient engagement requirements. The Minister of Energy indicated that Indigenous &amp; Community Engagement are high priorities.</li> <li>- If a proponent/applicant is willing to give an unusually low bid price, whether or not they have met the Rated Criteria Points, they could be offered a contract, exactly as was done in 2015/16 with the lowest receiving highest priority and then prices are levelized. Why would a proponent bother to try to meet the rated criteria when they can ignore them, offer the lowest bid price and still get the contract with a levelized price??</li> </ul>

## LT1 RFP and Expedited Process: Proposed Contract Design

Topic	Feedback
<p>Please provide feedback on the proposed contract design for the LT1 RFP and Expedited Process. The IESO welcomes feedback on the proposed approach for qualifying capacity as well as the proposed Capacity Payment Adjustment Mechanism.</p>	<ul style="list-style-type: none"> <li>-</li> </ul>

## LT1 RFP and Expedited Process: Proposed Term Lengths

Topic	Feedback
Please provide any feedback on the term length considerations proposed in addition to the incentive mechanism for the Expedited Process.	<ul style="list-style-type: none"> <li>- These seem acceptable given forecast requirements</li> </ul>

## Deliverability Assessment

Topic	Feedback
Please provide feedback on the IESO's proposed process for deliverability testing and timelines.	<ul style="list-style-type: none"> <li>- How will the "End of Life" discussions for certain lines and the possibility of new infrastructure/ refurbishment of existing lines affect the opportunity for and validity of testing? If there will be a completely refurbished line, will any project proposal within that community be able to apply, assuming the new line will be able to accept the MW?</li> </ul>

## Additional Acquisition Mechanisms: Same Technology Expansions

Topic	Feedback
Are the descriptions of the different kinds of upgrades/expansions clear and reflective of the options?	<ul style="list-style-type: none"> <li>-</li> </ul>
What are the interdependencies between the existing contract, any upgrades and on-site expansions that need to be considered?	<ul style="list-style-type: none"> <li>- Any Facility Upgrades/Expansions need to meet revised 2016 Noise Protocols, not previous, outdated protocols/ guidelines</li> <li>- Existing noise/other complaints with the project/proponent need to be evaluated and corrected by the proponent before any project/proponent is eligible for a new contract/extension. This encourages good community-minded behaviour.</li> </ul>
Are any interdependencies missing/not fully captured?	<ul style="list-style-type: none"> <li>-</li> </ul>

Topic	Feedback
What are the considerations for participating in the Expedited Process or LT1 RFP?	-
What other key considerations/risks need to be included to help ensure this initiative is successful?	<ul style="list-style-type: none"> <li>- Only those facilities/ operators who have met ALL existing REA requirements, e.g. noise emission/ imission testing should be allowed to apply. This may hasten the tying-up of loose ends and resolving of ongoing problems at existing project locations.</li> <li>- If the excuse is that the existing project cannot meet its requirement for 95% of capacity before testing occurs, maybe there is insufficient wind to expand the facility.</li> </ul>

## Additional Acquisition Mechanisms: Forward Capacity Auction

Topic	Feedback
<p>Is expanding eligibility to variable generation, self-scheduling and co-located hybrid facilities in the FCA and ACA a priority for stakeholders?</p> <p>(Refer to slide 99)</p>	<ul style="list-style-type: none"> <li>- As long as they are able to meet the requirement, there is no issue, if they are not able to meet their contract requirements, the contract should be terminated.</li> </ul>
<p>Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect the design differences?</p> <p>(Refer to slide 106)</p>	-
<p>Any feedback on potential features that could be considered for the design of the FCA?</p> <p>(Refer to slide 108)</p>	-
<p>Is expanding eligibility to variable generation, self-scheduling and co-located hybrid facilities in the FCA and ACA a priority for stakeholders?</p>	-

Topic	Feedback
Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect FCA design differences?	-
What other design features should be considered to increase the attractiveness of a Forward Capacity Auction as part of IESO's suite of acquisition mechanisms?  (Refer to slide 110)	-

## General Comments/Feedback

Where is the place for nuclear energy to apply for these proposals/ contracts?

Is there a way of bringing/ encouraging "ground source heat pumps" as a source for home/office heating within communities, to relieve some of the stress and requirement for additional electricity and infrastructure?

Are there plans for energy facilities to be "net metered", so we can actually see what we are paying for?