

# Feedback Form

## Long-Term RFP – June 9, 2022

### Feedback Provided by:

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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
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)	

## 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>	<p><b>Development Entity Qualifications: We have reviewed these criteria and we feel they are too restrictive. M’Chigeeng First Nation designed, permitted, financed, built, owned and operated a 4MW wind farm. COD was in 2012 and we continue to own 100% of this project. Under the current criteria, this experience does not qualify because it is too small and too old. To us this is a fairness issue, since Ontario has not had many opportunities for First Nations’ to undertake other projects since the FIT contracts ended about 6 years ago. We have also partnered with large developers in multiple FIT contract awards, but the qualification points seem to slip away from us since the developers are deemed to have possessed the bulk of executive responsibilities, notwithstanding that we acquired the capacity to undertake similar projects through these partnerships. First Nation’s can and normally do achieve much in the way of infrastructure development by means of hiring contractors, architects, engineers and project managers who are not part of our executive teams. We suggest that the qualification criteria should be relaxed to allow First Nation’s to submit as qualified proponents, notwithstanding that they previously have had less executive responsibilities in the fulfillment of their prior projects and notwithstanding that they would hire third parties in the various fulfillment roles, including financing, permitting and construction. Lastly, and this has been the practice in all fairness with First Nations, the IESO has provided incentive initiatives including the ability of “contract set asides”, “pricing incentives” and “Percentage of project ownership”. We wish this to continue allowing First Nations the ability to compete competitively with the existing mainstream developers and the potential for new Partnership Agreements.</b></p>

## LT1 RFP and Expedited Process: Proposed Contract Design

Topic	Feedback
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.	

## 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.	

## Deliverability Assessment

Topic	Feedback
Please provide feedback on the IESO's proposed process for deliverability testing and timelines.	

## Additional Acquisition Mechanisms: Same Technology Expansions

Topic	Feedback
Are the descriptions of the different kinds of upgrades/expansions clear and reflective of the options?	
What are the interdependencies between the existing contract, any upgrades and on-site expansions that need to be considered?	
Are any interdependencies missing/not fully captured?	

Topic	Feedback
<p>What are the considerations for participating in the Expedited Process or LT1 RFP?</p>	
<p>What other key considerations/risks need to be included to help ensure this initiative is successful?</p>	

## 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?  (Refer to slide 99)</p>	
<p>Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect the design differences?  (Refer to slide 106)</p>	
<p>Any feedback on potential features that could be considered for the design of the FCA?  (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>	
<p>Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect FCA design differences?</p>	

Topic	Feedback
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