

Feedback Form

Long-Term RFP – July 21, 2022

Feedback Provided by:

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Following the July 21st public webinar on the Long-Term RFP, the Independent Electricity System Operator (IESO) is seeking feedback from participants on: Municipal Council Support Resolution, Contract Design, Revised Timelines, and the Deliverability Test Guidance Document.

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

Please provide feedback by August 4, 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.

Municipal Council Support Resolution

Topic	Feedback
Please provide any feedback on the IESO's proposal to change the Municipal Council Support Resolution from a mandatory requirement to a rated criteria.	Boralex supports this proposal. Given the timing of the 2022 municipal election cycle in Ontario, many municipal councils likely will not meet until January 2023, therefore such mandatory requirement would pose an impossible threshold and would likely preclude highly developed and advanced projects from participating in the RFP process. However, in some cases municipal councils are willing and able to support projects on short notice and these projects should receive an RFP incentive through the Rated Criteria score for having increased approval certainty.

Proposed Contract Design

Topic	Feedback
Please provide any feedback on the potential use of indexing in the contracts and what indices (if any) may be best suited for these procurements.	We believe that the contracts should be indexed and that a combination of broad index of Producer Price and Consumer Price Index would be preferred, in addition to a Lithium-Carbonate index for storage projects. The indexation should span the time from the RFP bid submission through to Notice to Proceed.

LT1 RFP and Expedited Process: Revised Timelines

Topic	Feedback
Please provide feedback on the proposed revised timelines and whether these seem appropriate.	Considering the higher than anticipated level of interest in the RFQ Boralex understands why the IESO is proposing a revised timeline. It is Boralex's opinion that the timeline should not be revised. However, if a revision of the timeline is adopted, there will be a compression of the time period between contract award and equipment deposits. <u>Therefore, if the IESO is going to revise the RFP submission timeline it should also extend the COD deadlines by 2 months.</u>

Deliverability Test Guidance Document

Topic	Feedback
<p>Please provide any feedback on the Deliverability Test Guidance Document and associated form.</p>	<ol style="list-style-type: none"><li data-bbox="855 222 1490 1367">1. Section 2.4 of the "Deliverability Test Process for IESO Acquisition Mechanisms" states: "There can be new system expansions, such as new transmission lines or new feeders, that are planned or could be installed with possible in-service dates prior to the required project in-service. However, only the proposed connection to existing and operating transmission system or distribution system facilities will be accepted for purposes of the Deliverability Test" However, in the June 21, 2022 document titled Locational Considerations for New Resources, IESO identified several yet to be completed circuits and substations that were listed in "Section 1 – Preferred Area", including 230kV C87H, C88H, and Lakeshore TS. <u>Please note that in some cases the Preferred Areas list was relied upon in designing projects that were submitted for qualification in the IESO LT1 RFQ process in June. Therefore, can IESO please clarify that the yet to be completed infrastructure listed in the "Strong Preference West of Chatham" section of the "Locational Considerations for New Resources" document will be accepted for purpose of the Deliverability Test.</u><li data-bbox="855 1415 1490 1646">2. IESO should provide more information than just "Deliverable", "Not Deliverable" and Deliverable but Competing". It would be beneficial if the IESO provided information (such as sizing) that would be required to make the project deliverable.<li data-bbox="855 1694 1490 1881">3. With respect to the Deliverability Test Assumptions, we believe that the assumption of wind and solar generation being at their maximum output, concurrently with all other generation technologies at

	<p>maximum output, is not appropriate and will result in needless disqualification of viable resources. Wind and solar output tend not to be correlated, and in the exceedingly improbable event that both are simultaneously generating at peak output, it is unlikely that thermal generation would be as well.</p> <p>4. With respect to the Output of Existing Generation for the Storage Charging Test, it is highly improbable that a storage resource would be charged during a time period of zero wind, solar or peaking hydro output, as this would presumably be an exceptionally elevated price period. It is far more probable that storage would be discharging during these conditions.</p>
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General Comments/Feedback

The Guidance Document indicates that the deliverability assessment for storage will be performed differently from generation only insofar as it will account for the risk that storage resources might charge at times of elevated system demand. This represents a potentially significant missed opportunity, given the unique operating characteristics of storage and its potential interaction with other resources – Specifically in terms of the ability of storage to alleviate the risk of over-supply of generation within a given zone. This benefit should be reflected in the terms of an agreement that is more specifically designed for storage projects.