

# Feedback Form

## Long-Term RFP – July 21, 2022

### Feedback Provided by:

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Following the July 21<sup>st</sup> 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](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.

# Municipal Council Support Resolution

Topic	Feedback
<p>Please provide any feedback on the IESO’s proposal to change the Municipal Council Support Resolution from a mandatory requirement to a rated criteria.</p>	<p>Enbridge supports IESO’s proposal not to include Municipal Council Support Resolutions in the mandatory criteria given the tight development timelines and municipal elections this year.</p> <p>However, we agree with Power Advisory’s proposal that Municipal Council Support Resolutions be removed from the RFP criteria completely. As Power Advisory outlines, the Provincial government repealed certain parts of the <i>Green Energy Act</i> in 2018, which means that developers will now be required to obtain municipal approval for any new projects. As a result, it is not necessary to also capture the requirement in the criteria, whether rated or mandatory.</p>

## Proposed Contract Design

Topic	Feedback
<p>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.</p>	<p>Enbridge supports IESO’s proposal to include indexing in the contracts. Ontario could face power shortages without these projects coming online in the timeframe(s) IESO requires. Pricing volatility in the supply chain(s) for these power projects that is out of control of the government, IESO, and/or the developer should not prevent developers from completing the projects on time. We look forward to discussions on what indices would best to reference, and we recommend that the indices be proportionate to the aspect of project development that they represent, e.g., if materials are 70% of cost then the appropriate materials index should apply to 70% of costs, if parts are 10% then the industrial parts index should apply to 10% of costs, etc.</p> <p>We further support IESO’s consideration of a power storage-specific contract design given the nature of this procurement. We understand IESO’s objective was to keep the procurement tech neutral but we agree that this approach where bidders can bid on a power storage contract model or a capacity model will help ensure a wide range of entities can participate in a way that is economical for them, which will also deliver better results for ratepayers.</p> <p>We agree with Power Advisory that clarity on Environmental Attributes is important to the success of this procurement process. We understand that the timing is not ideal given that the Federal Clean Electricity Regulations are just now under development, which will inform provincial policies and frameworks, but we recommend that IESO and the Province provide at least high-level information about how the EA market will work in Ontario and a timeframe for implementation.</p>

## LT1 RFP and Expedited Process: Revised Timelines

Topic	Feedback
<p>Please provide feedback on the proposed revised timelines and whether these seem appropriate.</p>	<p>Enbridge generally supports IESO’s pushing back the timelines to ensure it has enough time to thoroughly review the submissions received to date and to perform the Deliverability Assessment.</p> <p>We have a few comments/questions on the revised timelines:</p> <ol style="list-style-type: none"> <li>1. It was not clear from the timeline when IESO will release additional detail on the deliverability assessment process and approach. With applications due on August 30<sup>th</sup>, it would be helpful to receive that information in the first week or two of August.</li> <li>2. We understood from the presentation on July 21<sup>st</sup> that the February 28<sup>th</sup> contract award date is an outside date and that IESO aims to award contracts sooner than that date. We agree that it would be helpful for IESO to award contracts as early in 2023 as possible so that Spring fieldwork and studies can begin in order to meet the tight development timelines.</li> <li>3. We understand that part of the reason for the November 30<sup>th</sup> Deliverability Test Results is to provide LDCs the time they need to participate in the Deliverability Test process, which we support. However, we agree with Power Advisory and encourage IESO to do whatever possible to enhance the LDCs’ readiness. Developers will have less than three weeks to complete modelling, assess costs and risks, and finalize development and bid submissions between receiving the results and submitting Expedited RFP bids – the window cannot get any shorter or else additional risk may be priced into the bids submitted.</li> </ol>

## Deliverability Test Guidance Document

Topic	Feedback
<p>Please provide any feedback on the Deliverability Test Guidance Document and associated form.</p>	<p>We agree with Power Advisory’s comments on the documents and assumptions and with Energy Storage Canada’s comments and Deliverability Test process and outcomes.</p> <p>We further reiterate that we request as much information as possible on the assumptions and process for performing the Deliverability Tests. Information provided to date is insufficient to make decisions about what project design/specifics to submit for review under the Test.</p> <p>The associated form on the website today is straightforward and easy to populate – we assume IESO will be providing an updated version for the Expedited process, is that correct? The form on the webpage now appears to be only for Same Technologies and does not request location or size information. Please clarify.</p>

## General Comments/Feedback

We appreciate IESO holding the Q&A session and for its ongoing consultation work on this procurement, and we look forward to continuing discussions. Enbridge notes that time is running short and we request that key information, including Deliverability Test process and assumptions, contract design, contract T&Cs, EA framework, all other RFP mandatory and rated criteria (and related details, e.g., what will IESO accept for “public meeting” under community engagement, what is acceptable evidence and/or what stage must the Indigenous partnerships be at in order to qualify, etc.) as soon as possible or else proponents will not be able to complete the necessary work by December 20<sup>th</sup>.