

Feedback Form

Long-Term RFP – July 21, 2022

Feedback Provided by:

Name: Jason Rioux

Title: Chief Development Officer

Organization: NRStor Incorporated

Email:

Date: Aug 8, 2022

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.	

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.	<p data-bbox="776 600 1515 716">We agree that indexing contracts against raw material costs and inflation is very important given today's supply constrained context.</p> <p data-bbox="776 758 1495 915">IESO referred to indexing against raw material costs to occur between signing of the contract and COD. We submit that the indexing must begin from the bid submission date.</p> <p data-bbox="776 957 1515 1394">We are also encouraged that IESO is considering storage specific considerations into the capacity-based model contract design. A key consideration unique to battery energy storage is that the project capacity will degrade over time. Capacity can be maintained over the contract term by augmenting batteries, however IESO indexing to actual battery costs over the contract term would be required in order to maintain a "flat" contract capacity. Alternatively, IESO can allow for a declining contract capacity to align with the annual degradation of battery projects.</p>

LT1 RFP and Expedited Process: Revised Timelines

Topic	Feedback
Please provide feedback on the proposed revised timelines and whether these seem appropriate.	Overall, we recommend that the IESO look for ways to build efficiencies into its procurement requirements such that contract award can be achieved as soon as possible.

Deliverability Test Guidance Document

Topic	Feedback
Please provide any feedback on the Deliverability Test Guidance Document and associated form.	The unique operational capability of energy storage resources does not appear to have been considered by the IESO as part of the Deliverability Test Guidance Document. Energy storage can support system stability and support interface transfer limits through different operating modes. Based on ESC’s review, the IESO does not appear to have considered places where energy storage may be able to connect while stand alone generation might face constraints. Further information on the treatment of energy storage resources in the Deliverability Test is required.

General Comments/Feedback

We are excited to see that there is “overwhelming interest in standalone storage” based on the submissions received during the RFQ phase. We are encouraged that the IESO is considering additional storage specific considerations into the contract design and look forward to helping provide input into its development.