

Barbara Ellard
Director, Resource & System Adequacy
Independent Electricity System Operator
120 Adelaide Street West, Suite 1600
Toronto ON, M5H 1T1
September 30, 2022

RE: Feedback on Draft E-LT1 RFP and Contract

Dear Ms. Ellard,

This feedback is being submitted on behalf of Soave Hydroponics Company / Great Northern Hydroponics (Soave) to help inform the ongoing development of the Independent Electricity System Operator's (IESO) E-LT1 RFP and Contract. In particular, our feedback is directed to help inform the ongoing development of the Same Technology Expansions stream, that will participate/compete in the E-LT1 and LT1-RFP.

Soave appreciates the ongoing work underway at the IESO to ensure that the province continues to have the necessary future electricity resources needed to meet consumer demands. We are imminently aware of the growing demands on the electricity system, especially given our location in the southwest region of the province, with operations in the controlled agricultural industry. We hope to continue to support the IESO's efforts to meet future needs as we seek to expand our existing on-site generation capacity.

We would like to note and commend the continued high degree of effort underway at the IESO to inform the design and operationalization of several procurement activities concurrently. The engagement activities continue to maintain a high level of engagement and professionalism from you and the staff at the IESO.

Soave offers the following feedback to help inform the ongoing development of these and future procurements.

Feedback on E-LT1 RFP: definition of Eligible Expansions, same connection point

IESO has defined project eligibility criteria for Expansions in presentation materials as: *separately-metered generation expansion at existing contracted facility or on-site expansion at the same connection point as the existing facility*. At the same time, the criteria for "Eligible Expansions" and "Eligible Expansion Counterparties" are under ongoing IESO consideration, and have yet to be defined in the Draft E-LT1 or LT1 RFP or Summary of Differences.

To enable the maximum number of expansion facilities, and ultimately MW capacity, to participate in the RFP process, we strongly encourage the IESO to consider eliminating the requirement for Expansions to utilize the existing connection point as the current facility for which the Expansion is proposed.

SOAVE



COGENERATION

Certain facilities in the province, in particular on the Distribution System, may have multiple potential connection points in very close proximity to their current property and existing connection point. As well, some Expansions may be pre-maturely eliminated from participating in the procurement where their existing connection point is at or near capacity. In some cases, developers have intentionally worked with local distribution companies to locate existing facilities in close proximity of multiple connection points to expressly enable future expansions and avoid capacity constraints.

By eliminating the restriction on the use of the same existing connection point for Expansions, it would enable the IESO to maximize the projects and MWs participating in the RFP, ultimately increasing competition, diversification of suppliers, and potentially fuel types. As well, the changes would continue to reflect the policy intent of acquiring incremental MWs from on-site same technology expansions at contracted facilities in regions experiencing significant capacity constraints in the near future.

For further consideration by the IESO, we also offer the following proposal to limit the impact of this potential change:

The IESO could amend/update the eligibility/definition for the E-LT1 and/or LT1 RFP Expansion stream to allow for the submission of a new connection point where:

- The expansion at a new connection point only applies to distribution connected generation
- the existing facility is already connected to the distribution system
- the new connection point will also be distributed connected generation connected to the distribution system
- the new connection point is located near (less than 250 meters) the existing facility/and or connection point
- the Expansion must be less than 50 MW
- the Expansion must remain on the same site/property as the existing facility

If the Expansion meets these requirements (or something similar), then the applicant would have a limited/defined period of time to amend their existing submission, or submit a new connection point into the IESO's Deliverability Assessment Test process.

Thank you for consideration of our feedback as you continue to evolve the RFP.

Sincerely,



Guido van het Hof
President
Soave / Great Northern Hydroponics



cc.

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