

November 18, 2022

**VIA EMAIL:** [engagement@ieso.ca](mailto:engagement@ieso.ca)

Independent Electricity System Operator  
Attention: Stakeholder Engagement  
1600-120 Adelaide Street West  
Toronto, ON M5H 1T1

**RE: Atura Power's Written Comments  
Expedited Long-Term RFP – November 8, 2022, Draft RFP and Contract**

Atura Power (**Atura**) appreciates the opportunity to comment on the November 8, 2022, draft Expedited Long-Term (**E-LT1**) RFP and contract.

#### Storage Revenue Model

Atura appreciates the IESO's consideration of the CanREA proposal as submitted in August 2022 (i.e., capacity contract with daily energy adjustment or new Exhibit M rider). Unfortunately, with the tight timelines to finalize the E-LT1 contract there is not enough time for the IESO and participants to effectively stakeholder the new proposed structure. As proponents have spent their time to-date modelling and stakeholdering the current payment structure, Atura recommends that the IESO move forward with its original proposal.

#### Project Size Configurations for Bid Proposal

It would be beneficial for the IESO to provide a way for proponents to bid several sizes for the same project. This would help proponents deal with the uncertainty of receiving a 'deliverable but competing' deliverability test result and also allow the IESO to fully fill their procurement target with the most economic projects.

This could be accomplished by allowing proponents to bid up to three different price and size configuration for the same project location. The mechanism could be structured so that once the first project configuration has been selected, no other configurations for that project location could be selected. For the purposes of the cap of 10 bids per proponent and total contract capacity of 600 MW storage / 400 MW other, the up to three configurations should count as one bid and the largest size configuration count towards the 600 / 400 MW limit.

#### Expedited RFP

The Eligibility Requirements in section 2.1(a)(i)(A) state that the E-LT1 RFP process is only open to Proponents who *"qualified as a Qualified Applicant under the LT1 RFQ...or Persons Controlled by such Qualified Applicants"*.

Atura recommends that this section should be expanded to “Persons Controlled by **or under Common Control with** such Qualified Applicants”. This change would allow proponents more flexibility in their corporate structuring considerations (including tax considerations, such as utilizing the ITCs) and bringing in third parties to support the project.

In addition to the comments above, Atura Power supports the submissions made by the Association of Power Producers of Ontario (APPrO) and Energy Storage Canada (ESC).

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Koontz', is positioned above the typed name.

Margaret Koontz  
Manager, Market Affairs