

Feedback Form

Long-Term RFP – June 29, 2023

Feedback Provided by:

Name: Jonathan Cheszes

Title: President

Organization: Compass Renewable Energy Consulting Inc.

Email: [REDACTED]

Date: July 13, 2023

Following the June 29th public webinar on the Long-Term RFP (LT1 RFP), the Independent Electricity System Operator (IESO) is seeking feedback from participants on design of the LT1 RFP and LT1 Contract.

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

Please provide feedback by July 13, 2023 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.

Revised COD of May 1, 2028

Topic	Feedback
Are Proponents supportive of the revised COD date and the introduction of Capacity payment multipliers for early operation?	Compass is supportive of this.

Revised procurement targets

Topic	Feedback
Are Proponents supportive of the revised LT1 procurement targets on slide 15, which has increased the overall procurement target from 2,200MW to 2,505MW? This enables unused MWs in the Non-Storage Category from the E-LT1 RFP to the Non-Storage Category in the LT1 RFP. The IESO continues to reserve the right to accept the marginal bid above the Storage Category procurement target.	The E-LT1 RFP pricing demonstrated that Storage resulted in approximately 20% lower costs for ratepayers (i.e. 80.6% = \$881.09/\$1,093.22). Recognizing this incremental value for ratepayers, Compass encourages the IESO to reevaluate its procurement targets for Storage vs. Non-Storage to prioritize the lowest cost resource. At the very least, the IESO should allocate any unused Non-Storage Category procurement target to the Storage Category procurement target, subject to price thresholds. Therefore, at a minimum, the Storage Category procurement target should be greater than or equal to 1,600 MW and the Non-Storage Category procurement target should be less than or equal to 905 MW.

Changes to Rated Criteria

Topic	Feedback
Are Proponents supportive of the revised Rated Criteria approach as laid out on slides 20 and 21? This includes the removal of the duration of service as a Rated Criteria and setting minimum duration requirements as a Mandatory Criteria for Storage Category and Non-Storage Category resources. Remaining Rated Criteria include: Local Governing Body Support, and Indigenous Participation.	Compass supports the removal of the duration of service Rated Criteria and the setting of a minimum duration requirement by category. Compass is supportive of Rated Criteria for Local Governing Body Support, and Indigenous Participation.

Inclusion of the MCIA in the LT1 RFP

Topic	Feedback
Are Proponents supportive of continuing to include MCIA options in the LT1 RFP?	

Changes to Proponent Group Award Limit

Topic	Feedback
<p>Are Proponents supportive of increasing the Group Award Limit for Storage Category resources from 600 MW to 900 MW?</p> <p>Additionally, the IESO invites Proponents to provide Group Award Limit feedback with regards to the Non-Storage Category.</p>	<p>Compass does not support this change. Increasing the Group Award Limit for the Storage Category from 600MW to 900MW increases risk by potentially concentrating development risk on fewer developers. More than half of the anticipated Storage Target Capacity could be awarded to a single developer where the Group Award Limit is increased to 900 MW. There are a host of reasons why a single developer may not be able to perform its obligations. If this procurement is focused on ensuring reliability, spreading out the number of developers reduces the risk that the MW of capacity needed will show up.</p>

Other or General Comments/Feedback: