

Feedback Form

Resource Adequacy – December 15

Long-Term RFP and MT RFP Bridging and Cadence

Feedback Provided by:

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Date: January 10, 2022

To promote transparency, feedback submitted will be posted on the Resource Adequacy webpage unless otherwise requested by the sender.

- Following the December 15, 2021, Resource Adequacy webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the Long-Term RFP and MT RFP Bridging and Cadence
- Background information related to these feedback requests can be found in the presentation and meeting recording, which can be accessed from the [engagement web page](#).
- **Please submit feedback to engagement@ieso.ca by January 7, 2022.** If you wish to provide confidential feedback, please mark the document “Confidential”. Otherwise, to promote transparency, feedback that is not marked “Confidential” will be posted on the engagement webpage.

Medium-Term RFP (bridging and cadence)

Topic	Feedback
Bridging Proposals (MT RFP)	Capital Power supports bridging contracted resources to the next MT RFP commitment period.
Cadence Proposals for subsequent MT RFPs	No additional comments at this time.
Forward Periods for MT RFPs	The proposed forward period of 2 years is reasonable for the MTRFP.
The eligibility for using the flexible start date	Capital Power is supportive of the proposed eligibility requirements for flexible start dates.
Interaction between medium and long-term procurements, as well as the capacity auction	Capital Power supports and appreciates the IESO's commitment to ensuring resources committed under the MTRFP remain eligible to participate in the LTRFP, assuming the resource meets all other eligibility requirements. Capital Power also supports the IESO's incorporation of early term starts into its bid evaluation framework for the LTRFP.
General comments and feedback	No additional comments at this time.

Long-Term RFP

Topic	Feedback
LT RFP Milestones/Timelines	Capital Power appreciates the detail provided by the IESO. Significant efforts will be required to meet the proposed milestones and Capital Power looks forward to actively participating in the IESO's engagement process.

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Interdependencies and associated timelines	<p>The successful advancement of the Hybrid Integration Project will be critical for the success of the LTRFP. Capital Power notes that the visual representation of work streams on slide 21 of the IESO’s presentation appear to suggest the IESO anticipates 1-2 weeks between the publication of the AAR and the completion of the Hybrid Integration project. The completion of the Hybrid Integration Project also appears to directly correspond with the publication of the LTRFQ. These interdependencies clearly indicate the need for highly efficient coordination between workstreams. Capital Power supports prioritizing time and resources to ensuring the stakeholder engagement sessions are effective. Stakeholder engagement meetings should be scheduled to permit and facilitate an informed discussion of issues, allowing time for both the IESO and stakeholders to review and consider feedback prior to each subsequent meeting.</p>
Forward Periods for MT RFPs	See comments above.
AAR Development	<p>Capital Power has previously provided feedback on the AAR and looks forward to further participation in AAR-related engagements scheduled for January 2022.</p>
LT RFP Eligibility	<p>Capital Power has provided feedback with respect to LTRFP eligibility and underscores that eligibility requirements must not preclude participation by existing resources. To generate competitive and high-value outcomes, existing resources must be permitted to compete against new resources for commitments under the LTRFP.</p>
Term Length and Commercial Operation Dates	<p>Capital Power supports flexible commitment periods, and therefore supports incorporating CODs that reflect the potential staggering of commitment periods. The IESO may wish to consider permitting proponents to bid a combination of both term and price. Capital Power has previously provided feedback on term length and the need for the LTRFP to provide commitment periods of 10 years minimum duration.</p>

Topic	Feedback
Permitting and Siting Requirements	Requisite permitting and siting requirements should be reasonably achievable in the context of the timelines put forward by the IESO. Capital Power looks forward to providing additional feedback once the IESO has presented material to stakeholders.
Locational Considerations, Connection and Deliverability	Capital Power looks forward to providing additional feedback once the IESO has presented material to stakeholders.
Additional Procurement Design	Capital Power looks forward to providing additional feedback once the IESO has presented material to stakeholders.
Contract Design	<p>Contract design should be consistent with the goal of attracting investment that accords with recent policy direction from the Ministry of Energy. Contracts should also offer terms that are both fair and competitive given Ontario’s market structure, significant uncertainty regarding market performance following Market Renewal, and global competition for capital.</p> <p>Capital Power looks forward to providing additional feedback once the IESO has presented material to stakeholders and appreciates the IESO’s commitment to engaging with stakeholders on related matters.</p>
General comments and feedback	No further comments at this time.

General Comments/Feedback

No further comments at this time.