

Feedback Form

Overview and Q&A Session on the Small Hydro Program (SHP) Draft Documents: September 19, 2023

Feedback Provided by:

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Date: September 26, 2023

Following the September 19, 2023 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by end of day Tuesday, September 26, 2023. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

SHP Draft Documents

| Topic | Feedback |
|--|---|
| <p>What feedback do you have related to OEFC eligibility and the requirement to terminate the OEFC Contract prior to the Contract Date?</p> | <p>Innergex supports the ability for a proponent to apply for an SHP contract prior to the expiration or termination of an OEFC Contract, and for the migration to the SHP contract concurrent with OEFC contract expiration/termination. The Minister's Directive states: "The IESO shall, working with the Ministry of Energy and the Ontario Financing Authority (OFA), report back by March 31, 2024, on the feasibility of transferring the NUG contracts to IESO by terminating all of OEFC's remaining NUG contracts for hydroelectric facilities, and allowing IESO to enter into contracts with these facilities on financial terms that are materially consistent with their existing NUG contracts, provided that the contract entered into by IESO expires at the same time that the NUG contract would have expired. The IESO's report back should also include an analysis of the treatment of outstanding debt owed by the NUG generators to OEFC." OEFC contract holders would appreciate the opportunity to work directly with the IESO in the development of the report back.</p> |
| <p>What feedback do you have related to the GRC (Gross Revenue Charge) Adjustment mechanism?</p> | <p>We support the comments of the Ontario Waterpower Association (OWA).</p> |
| <p>What feedback do you have related to Upgrades & Expansions being enabled for those in the SHP that previously held HCI Contracts?</p> | <p>We support the comments of the Ontario Waterpower Association (OWA).</p> |
| <p>What feedback do you have related to Exhibit B1 of the draft SHP-AR Contract?</p> | <p>We support the comments of the Ontario Waterpower Association (OWA).</p> |
| <p>What feedback do you have on the draft SHP Contract?</p> | <p>We support the comments of the Ontario Waterpower Association (OWA).</p> |
| <p>What feedback do you have related to Exhibit B2 of the draft SHP-AR Contract or Exhibit B of the draft SHP Contract?</p> | <p>We support the comments of the Ontario Waterpower Association (OWA).</p> |

| Topic | Feedback |
|--|--|
| What feedback do you have on the draft Application Form? | We support the comments of the Ontario Waterpower Association (OWA). |
| What feedback do you have on the draft Prescribed Forms? | We support the comments of the Ontario Waterpower Association (OWA). |
| What feedback do you have related to Rules related to Secured Lender Agreements? | We support the comments of the Ontario Waterpower Association (OWA). |

General Comments/Feedback

We support the comments of the Ontario Waterpower Association (OWA), in particular: The ability for a proponent to apply for an SHP contract prior to the expiration or termination of an OEFC contract; and provision of a fair and objective means to determine ownership of future federal or provincial financial measures (such as Investment Tax Credits).