

# Feedback Form

## Long-Term 2 RFP – December 13, 2023

### Feedback Provided by:

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Date: January 9, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender.

Following the LT2 RFP engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on specific items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

**Please submit feedback to <mailto:engagement@ieso.ca>** by January 15, 2024. If you wish to provide confidential feedback, please mark "Confidential". Feedback that is not marked "Confidential" will be posted on the engagement webpage.

## Resource Adequacy Framework and Cadenced Procurement Approach

Topic	Feedback
Do you have any comments or concerns regarding the cadenced nature between upcoming LT and MT RFPs?	We observed that no specific cadence or framework has been outlined for future Capacity RFPs.
Do you have any comments or concerns regarding the proposed offering of both capacity style and new revenue model style of contracts, based on resource eligibility requirements and system needs?	<p>One of our main concerns: the absence of an established framework for future capacity offerings. We believe the implementation of an "all-source RFP" would be highly beneficial.</p> <p>Additionally, we would encourage the Ontario IESO to provide clear procurement targets within this all-source RFP for each technology. This would cultivate a more transparent and competitive environment for achieving specific procurement targets that align with the province's environmental and reliability goals.</p> <p>We strongly advocate for clearly differentiated targets for each technology - such as distributed solar, distributed storage and utility-scale storage. This specificity could greatly enhance clarity, guiding focused development efforts, and optimizing the energy procurement process.</p>
Do you have any concerns regarding the proposed target setting approach for upcoming MT RFPs?	Yes, the MT approach incentivizes participation of existing power plants, limiting the scope for developing new, competitive, and carbon-free energy resources, which tend to require a long-term contract to be financeable.
Do you have any comments regarding how best to employ bridging and extensions to contracts to facilitate the success of the Resource Adequacy Framework?	

## LT2 RFP Resource Eligibility and Timelines

Topic	Feedback
Do you have any general feedback on resource eligibility and timelines?	Our main feedback is that no specific timeline has been provided for future Capacity RFPs.

Topic	Feedback
If the potential of repowering an existing facility applies to you, would you be interested in exploring this option further?	
How should the optimal threshold for what constitutes a partial or fully repowered facility be determined and what considerations should be taken into account regarding the repowering of different resource types?	
What considerations should be taken into account for new-build DERs?	<p>For new-build DERs, it's crucial to consider potential aggregation opportunities and facilitate participation of DERs less than 1 MW in capacity. Additionally geographic information should be provided to developers about where the IESO is most interested in developing these DERs.</p> <p>Lastly, we urge the IESO to acknowledge the grid benefits of distributed resources and to establish specific procurement targets for both solar and storage distributed resources that are less than 5 MW.</p>
Please express any interest and opportunities for uprates and/or expansions at any of your existing facilities.	

## LT2 RFP Design Considerations – System Congestion and Deliverability Approach

Topic	Feedback
What early system congestion information do proponents need to guide them in choosing the location of their projects and when is this needed by within the procurement cycle?	
Do you have any general suggestions for how to approach deliverability evaluation in the LT2 RFP?	

## LT2 RFP Design Considerations – General Feedback

Topic	Feedback
Do you have any comments regarding the impacts that agricultural land-use limitations may have on project development?	
Do you have any comments regarding what evaluation criteria can be utilized to evaluate project readiness, given tight timelines and reliability needs?	Bidders who can provide concrete proof of site control should be prioritized, as this significantly decreases project risks and minimizes the speculative nature of the undertaking. Moreover, the evaluation process could benefit from a ranking system based on the degree of site control demonstrated by bidders. This system would further reward proactive and orderly project planning.
Do you have input on the proposed mechanism for valuing Indigenous participation?	<p>Given the nature and geographical location of our typical projects, Indigenous Engagement might not always be applicable.</p> <p>Our projects, usually based in urbanized areas and on pre-developed land such as warehouses, are generally located far from Indigenous communities. For instance, our distributed solar projects are usually rooftop installations. Thus, direct Indigenous engagement may not always be necessary.</p> <p>Hence, we suggest that certain projects, like distributed solar and storage, should be exempt from this requirement.</p> <p>We recognize and appreciate the value of Indigenous Participation and endorse its continuation as a rated criterion.</p>
Are there any other rated criteria that should be considered?	Another rated criterion that should be considered is geographic location.

## Long Lead Time Resources

Topic	Feedback
Does the proposed approach to enabling long-lead time resources enable meaningful participation or sufficient certainty?	The proposed timeline does not appear to provide meaningful participation opportunities or sufficient certainty for long-lead time resources in the context of Capacity RFPs.
What additional considerations should the IESO contemplate for enabling broader participation from long-lead time resources?	For enabling broader participation from long-lead time resources, the IESO should contemplate providing more information on how it will determine the need for future Capacity RFPs. Transparency in this process, including clear communication of how and when this assessment will occur, would certainly be beneficial.

## Revenue Model

Topic	Feedback
As a potential proponent, are you generally supportive of the proposed Enhanced PPA revenue model? Are there any other considerations that the IESO should look into further with regards to the revenue model?	We stand in support of the revenue model for energy generation resources, provided that the PPA language sufficiently secures the developer's revenue requirements. Also, the methodology should be explained in a clear and straightforward manner. This clarity provides financial institutions with an easier path to project-finance these projects, as well as making the monthly operation of the contract more manageable.

## General Comments/Feedback