Feedback Form

Long-Term 2 (LT2) RFP – February 15, 2024

Feedback Provided by:

Name: Michelle Moxley-Peltier

Title: Community Energy Plan Administrator

Organization: The Corporation of the City of Windsor

Date: February 15, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Confidential".

Following the LT2 RFP February 1, 2024, 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 engagement@ieso.ca by February 15, 2024.

ieso
Connecting Today.
Powering Tomorrow.

Revenue Model

Topic	Feedback
Do you have any additional comments regarding the revenue model, particularly with regards to the following: Deeming energy market revenues based on real-time locational marginal prices (LMP), as opposed to the IESO's recommendation of basing this on the day-ahead LMP. (Slides 19-21) • The optionality of using either a simple average day-ahead price or weighted average LMP, with the latter including hours where the resource was scheduled day-ahead in a given month. (Slides 22-23) • Including monthly production factors that on average equate to the annual production factor, in order to further account for seasonality. (Slides 24-26)	N/A - Municipality

DERs

Topic	Feedback
Do you have any comments regarding eligibility requirements for DERs of other general comments?	Question: Is IESO opening up the Market Participants to entities who did not participate in previous procurements? Can municipalities propose applicable projects for LT2 RFP? Slide 68: Interested in learning more about the requirement: At least 1MW in size or as enabled in the market. What does as enabled in the market mean, and what's the lower limit in relation to size? When in the process would a proponent know whether a smaller than 1MW project is acceptable? For the purpose of the DER conversation within the LT2 RFP, what is the definition of a single node? Is it a single customer, or attachment to a single station (i.e. distribution or transmission stations). Will a single node allow for "Community Net Metering" where multiple small producers are aggregated at the community level into a single node? (i.e. suppose a municipality has a number of municipal buildings located in close proximity. Could solar projects from each building be aggregated and attached to the electrical grid at a single "community node"?) With an in-service of 2030 for LT2, what parameters, guidelines, regulations, exist regarding the development of DERs? Looking towards future land use planning, which could site greenfield industrial developments, and whether DER systems could/should be set up in conjunction with new industrial parks.

Capacity Resources

Topic	Feedback
Do you have any comments regarding considerations for acquiring additional capacity resources, and utilizing a multi-stream approach (energy and capacity streams)?	The multi-stream approach can provide flexibility. Can the IESO provide additional information regarding the differences between an energy focused procurement vs. a capacity focused procurement, and how both streams can be utilized to meet changing electrical system constraints.

LT2 Deliverability

Topic	Feedback
Do you have any comments on early deliverability data and evaluation stage deliverability?	Questions:
	Any consideration to providing early deliverability data to municipalities or economic development agencies by region (i.e. Windsor-Essex or geographic region alignment with an existing Hydro One model)? In particular provide system congestion information. (i.e. Zonal Data, Line Data, connection specific limitations).
	• Recommend IESO provide system congestion constraints to Regional Planning department to be included in planning processes (i.e. IRRP). Areas with system constraints will require infrastructure to alleviate the congestions points. Without infrastructure plans or investment, these areas will continue to be eliminated from future procurement awards.
	• Recommend IESO engage with municipalities facing system congestion constraints to discuss the current state of the system and potential avenues for advocacy.
	Does the proposed early deliverability data report replace the deliverability test from LT1 RFP? Is the early deliverability data report intended to replace the Deliverability Test from LT1 RFP as the go-no go decision point for proponents?
	On slide 63 bullet 1
	As part of the Proposal Evaluation stage, a deliverability assessment will be completed to confirm that the contracted projects can effectively contribute to meeting the reliability needs intended to be addressed by LT2 RFP Isn't waiting until after the RFP closes before analyzing an individual project's deliverability, leaving it a bit late in the process? Will the early deliverability data report provide adequate feedback so that proponents are not expending time, resources, and money to submit bids for infeasible projects?
	More information is needed regarding IESO's thoughts on the purpose and benefits of conducting the deliverability assessment after project submission before providing further comment.

Repowering

Topic	Feedback
Do you have any comments around repowering participation?	N/A - Municipality

Long Lead-Time Resources

Topic	Feedback
Do you have any comments on enabling long-lead time resources?	N/A - Municipality

General Comments/Feedback

Terminology and Definitions:

Several concepts were introduced in the February 1, 2024, webinar. It would be beneficial to provide definitions and commentary regarding the purpose (usage) of terms within the procurement process. (i.e. system congestion)

Feedback timing:

The February 1, 2024, webinar touched on numerous topics. The feedback period provided (14 days) is tight for municipalities to draft, review, and approve comments unless a directive exists allowing for delegation of approvals.

Slide 70:

The Foundational Model is available for stakeholders to review and is expected to be codified in the IESO Market Rules within the 2026/2027 timeframe; and

Stakeholders seeking further information on the Foundational Model should follow the Enabling Resources Program webpage.

Where can I find the Foundational Model on the IESO website for review? It is not currently found on the Enabling Resources webpage linked in the presentation.

Municipal Engagement Webinar:

Consider hosting a municipality focused engagement webinar. Review proposed changes for both MT and LT2 streams from a municipal perspective. Introduction of 101 level discussion that can be shared with municipal councils.

- What should municipalities know?

- What is the province's overall plan for energy procurement?

Councils are starting to ask for more information upfront and are interested in benefits, impacts, and risks to the municipality (by technology type) when deciding to approve requests for municipal support.

Community Benefit Funds:

What is IESO's stance on proponents offering community benefit funds to municipalities or indigenous communities? Are there perceptions/concerns that offering community benefit funds when tied to requests for municipal support? Will there be language regarding this in LT2?