

Same Technology Upgrade Call for Solicitations Feedback – September 30th 2022

Feedback Provided by:

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Following the Independent Electricity System Operator's ("IESO") release of the Draft Outline for Same Technology Upgrades Solicitation – Call for Submissions on September 15th, Invernergy Renewables Canada Development ULC ("Invernergy") is pleased to provide the following feedback and questions to the IESO, which we believe will allow for a more competitive and cost-effective procurement of resources for Ontario rate-payers. We thank the IESO for the opportunity to provide feedback on this procurement and would be pleased to meet with the IESO to discuss any of the issues or ideas raised in this submission.

Unclear whether we must submit two offers with different termination dates if we wish to pursue a contract extension

Feedback	Question
<p>The Draft Outline for Same Technology Upgrades Solicitation - Call for Submissions v2 article 4.b states that "Submissions in respect of Facilities with contracts expiring on or before December 31, 2032 may also include an alternative proposal (the "Extension Proposal") where the contract term expiry is extended to April 30, 2035, including the applicable Net Revenue Requirement that would apply (the "Alternative NRR")."</p> <p>It is unclear to us if we can choose to offer only an alternative proposal with the contract extension to 2035, or if we are obligated to submit two offers – one ending at the end of our original contract term and one that has an extended term to 2035.</p> <p>We have a clear preference to seek a contract extension and would prefer not having to offer two proposals.</p>	<p>Can proponents submit only an Extension Proposal without having to offer a Proposal with the original contract end date?</p>

Contract does not appear to account for lost Revenue during construction-related outage period

Feedback	Question
<p>Article 8 (vii) states the "Uprate Amendment will also provide for the exclusion from the Availability calculation of the duration of Outage taken to complete the Permitted Upgrade" but there is no mention for commercial consideration for lost revenue.</p>	<p>In addition to excluding the outage duration from the Availability calculation will IESO also adjust the Supplier's INR accordingly?</p>

Open Book Process

Feedback	Question
<p>The IESO asks in article 4.a.iii for suppliers to “provide on an open-book basis, the derivation of the Upgrade NRR”. This request may need to be reconciled with confidentiality requirements that exist in our agreements with suppliers.</p>	<p>What information will the IESO require for this stage? Will allowances be made in recognition of supplier’s confidentiality obligations to its own suppliers?</p>