

Feedback Form

Long-Term RFP – March 28, 2023

Feedback Provided by:

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Following the March 28th public webinar on the Long-Term RFP (LT1 RFP), the Independent Electricity System Operator (IESO) is seeking feedback from participants on design of the LT1 RFP and LT1 Contract.

The referenced presentation can be found on the [Long-Term RFP webpage](#).

Please provide feedback by April 11, 2023 to engagement@ieso.ca.

Please use subject header: *Long-Term RFP*. To promote transparency, this feedback will be posted on the [Long-Term RFP webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.

LT1 RFP Design and Lessons Learned from E-LT1 RFP

Topic	Feedback
<p>E-LT1 RFP: Please provide any general feedback reflecting on your participation in the E-LT1 RFP as it relates to the upcoming LT1 RFP.</p>	<p>There is insufficient time between the conclusion of the Deliverability Assessment and the Proposal Submission deadline. The results of the Deliverability Assessment determine critical project parameters, including project size. One month is not enough time to adjust key development items, such as supplier contracts, financing terms, internal approvals, etc. Please note that E-LT1 had a two-and-a-half-month period between results and proposal deadline. If the IESO cannot extend the proposal deadline, it may consider moving up the start of the Deliverability Assessment period from July to immediately following E-LT1 contract awards (May/June). This would also necessitate timely publication of the E-LT1 Deliverability Test Report and the updated Deliverability Guidance Document.</p> <p>As part of its E-LT1 Deliverability Test Report, the IESO should be as specific and explicit as possible about its findings, including the chances of receiving a Deliverable or Deliverable but Competing designation at specific locations as part of the LT1 process. This could include specific guidance on the expected maximum new capacity that could connect at a certain location/zone. Doing so will help prospective LT1 proponents tailor their projects accordingly, hopefully leading to a more streamlined and efficient assessment period.</p> <p>In consideration of the overall compressed procurement and in-service timelines – with the start of the Deliverability Assessment delayed from January to July, for instance – meeting May 1 2027 in-service date is becoming increasingly challenging. Recognizing that the IESO doesn't want to push the in-service date, it may alternatively reconsider its application of liquidated damages. The IESO could extend the period beyond Milestone COD before which Delay Liquidated Damages apply from the 90 days currently in the E-LT1 contracts. Furthermore, the IESO could return any Delay Liquidated Damages in the event the project reaches COD prior to the Longstop Date.</p>

Topic	Feedback
	<p>As it relates to the LT1 Deliverability Assessment, can the IESO please confirm how it intends prioritize Eligible Expansions versus New-Build Resources?</p> <p>To the extent the IESO procures less than the 900 MW target for Non-Storage resources through the Same Technology Expansion and E-LT1 procurements, will the unfulfilled target be added to the LT1 Non-Storage target?</p>
<p>LT1 RFP design: Please provide any feedback on the proposed Mandatory Requirement for Municipal Support.</p>	<p>Requiring proponents to secure Municipal Support prior to proposal submission ensures the maximum number of projects will seek municipal support. This threatens to overwhelm municipalities. E-LT1 demonstrated that many municipalities are not setup to handle a high volume of requests in a short period of time, nor are they equipped to assess the quality of individual projects so that they may appropriately focus their limited resources. Alternatively, the IESO could continue with municipal support as a Rated Criteria at the time of submission, paired with a requirement to demonstrate support prior to the start of construction (or, say within 12 months of contract award). This provides proponents and municipalities with more time to consult and arrive at an agreeable resolution, while still encouraging early engagement with municipalities.</p>
<p>LT1 RFP design: Please provide any feedback on the Rated Criteria Categories and Point Allocation.</p>	<p>To the extent the Rated Criteria from E-LT1 to LT1, the IESO should prioritize publication of these changes in order to provide proponents with sufficient time to adjust their development activities.</p>

Indigenous Community Participation

Topic	Feedback
<p>Please provide any feedback on the Rated Criteria for Indigenous Community Participation as contemplated in the E-LT1 RFP as it relates to the upcoming LT1 RFP.</p>	

Proposed Contract Design: General Feedback

Topic	Feedback
<p data-bbox="180 163 764 247">Please provide feedback on any contract provisions you wish to comment on.</p> <p data-bbox="180 268 764 426"><i>Note: the commercial structure/ revenue model for the LT1 Contract will not be modified from that which was used under the E-LT1 Contract.</i></p>	

General Comments/Feedback