

# Feedback Form

## Long-Term 2 RFP | Deliverability Guidance Document | April 18, 2024

Feedback Provided by:

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Date: May 2<sup>nd</sup>, 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 Guidance Document webinar on April 18, 2024, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the items discussed during the session. The presentation material and recording can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by May 3, 2024.**

## Guidance Document: Readability and Layout

Topic	Feedback
Do you have any advice or feedback on the style, layout and overall readability of the April 2024 Deliverability Guidance Document released by the IESO?	No comments.

## Guidance Document: Content

Topic	Feedback
<p>Are there any specific areas of the Deliverability Guidance Document that you would like to provide feedback on from a technical and/or content-specific point of view?</p> <p>If so, please be as specific as possible in your feedback and consider using page numbers and content title where possible to ensure the IESO can consider your feedback accurately</p>	<p>Given the constraints laid out on Slides 17 among others, is it even possible to connect the levels of IBR stated on Slide 12? Given the one IBR connection per circuit, and very low max sizes (30, 100, 150 MW, etc.), can the IESO comment on what is practically achievable given the number of circuits and their respective voltage levels in each area? The IESO should follow up on the April 18<sup>th</sup> presentation and more clearly present the most binding constraints for IBR in each zone.</p> <p>With respect to the Short Circuit Limitations and Protection Limitations sections and slides, SWEB is of the opinion that it is unlikely that the IESO can meet its long-term energy planning needs without incorporating the necessary upgrades. Avoiding stations altogether where breaker duty may be exceeded is not a practical long term energy planning strategy given Ontario’s energy shortfall in the coming years. Additionally, avoiding certain circuits due to complexity in updating protection settings is not advisable, and from SWEB’s experience, is not an approach taken by other ISOs when evaluating new generator interconnections.</p> <p>SWEB recommends that the IESO and the transmission owners evaluate generation enabling transmission upgrades and/or non-wires alternatives to be added within Proponent’s bids to circumvent the onerous connection limitations to high voltage circuits in various zones, and to have those bids scored and evaluated appropriately.</p> <p>Additionally, SWEB recommends that the IESO not implement these MW caps listed on slides 16, but instead allow the developer to submit projects above these limits accompanied by their own commissioned EMT study using the IESO base case and PSCAD models of the specific inverter being proposed, if absolutely necessary to avoid hard limits on these high voltage circuits.</p>

Topic	Feedback
<p>Do you find the preliminary connection guidance information sufficient for your siting needs? If you feel more information is required, please be specific on what other information you would find useful.</p>	<p>The limitations the IESO presents do not offer renewable resources great certainty in bidding and/or siting their projects in an economically competitive manner due to the size limitations on high voltage circuits. These constraints hinder IBRs in reaching their full competitive potential and realizing their lowest LCOE by preventing them from achieving full economies of scale on 115 kV and 230 KV circuits.</p> <p>Due to the limitation of one IBR connection per circuit in addition to the low MW caps, this creates a limit on the amount of IBRs that can be awarded under this procurement, and from SWEB’s perspective, results in an unlikelihood that the IESO reaches their IBR limits stated on Slide 12.</p>

General Comments/Feedback: