

From: Janet Macbeth
Sent: August 5, 2022 1:24 PM
To: Indigenous Relations
Subject: WIFN comments on IESO's planned RFP for generation

Good afternoon,

Please find below WIFN's comments on IESO's proposed RFP process:

- IESO's RFP process needs to be framed in terms of Economic Reconciliation with First Nations. Removing barriers accessing financial capital, equity ownership, and project benefits are essential
- First Nation communities are diverse and not all of them feel that meaningful partnerships cannot be built during the expedited process. Some already have developed relationships with potential partners and/or have a history of negotiating partnerships with tight timelines. What is needed is an indigenous adder to the PPA that is large enough to encourage Indigenous participation. The adder is what a First Nation can bring to the table to make a partnership mutually beneficial. A minimum of 15% equity by a First Nation local to the project area should come with a sizable adder. Adders work very well in RFP process and can be equivalent to point consideration, but allow for partnerships to form post-contract, but pre-NTP. There is a real risk of low First Nation involvement in the Expedited process if no meaningful incentives are offered. A similar thing happened during FIT 1.0 where the adder was offered, but it wasn't significant enough compared to the FIT rates that were initially offered. Many companies did not see why they should let First Nations in, because they were already making enough money with the rates. An RFP style procurement with significant adders would encourage First Nation investment.
- Priority should be given to First Nations in both processes should be based on both local proximity and traditional territory
- Priority can be given to First Nations whose territories are identified as being in high priority generation areas
- The RFP process should not be strictly technology agnostic but should favour renewables and low carbon generation. The greening of the grid helps everyone in the province in reaching carbon reduction goals

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