

# Feedback Form

## Long-Term 2 RFP – December 13, 2023

### Feedback Provided by:

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Organization: The Corporation of the city of Windsor

Date: January 15, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender.

Following the LT2 RFP 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 <mailto:engagement@ieso.ca>** by January 15, 2024. If you wish to provide confidential feedback, please mark "Confidential". Feedback that is not marked "Confidential" will be posted on the engagement webpage.

## Resource Adequacy Framework and Cadenced Procurement Approach

Topic	Feedback
<p>Do you have any comments or concerns regarding the cadenced nature between upcoming LT and MT RFPs?</p>	<p>Agree with the cadenced approach to LT and MT RFPs. Provides a predictable timeline for procurements with flexibility available to adjust timing depending on need.</p> <p>Intrigued by alternating long term procurements (@20 years) with medium term procurements (@5 years), allowing for new infrastructure and the extension of existing infrastructure.</p> <p>Encouraged by restricting projects to non-emitting resources for LT procurements. This will allow for growth of renewable infrastructure.</p> <p>As the December 13 engagement did not provide explicit details regarding the MT procurements, there is a concern that these procurements could be used to extend natural gas generation contracts by 5-year increments.</p>
<p>Do you have any comments or concerns regarding the proposed offering of both capacity style and new revenue model style of contracts, based on resource eligibility requirements and system needs?</p>	<p>N/A</p>
<p>Do you have any concerns regarding the proposed target setting approach for upcoming MT RFPs?</p>	<p>Recommend basing a portion of the MT target on a % of expiring contracts across a 5-year period for the MT RFP.</p>
<p>Do you have any comments regarding how best to employ bridging and extensions to contracts to facilitate the success of the Resource Adequacy Framework?</p>	<p>Nothing concrete. Hope bridging or extension contract process is transparent and completed in consultation with impacted municipal and indigenous communities. Potential for these types for contracts to include natural gas facilities, prolonging their usage.</p>

## LT2 RFP Resource Eligibility and Timelines

Topic	Feedback
Do you have any general feedback on resource eligibility and timelines?	<p>Support non-emitting, energy producing resource eligibility for the upcoming RFP.</p> <p>Interested in learning more about the DER new build resources and opportunities for municipalities to participate</p>
If the potential of repowering an existing facility applies to you, would you be interested in exploring this option further?	N/A
How should the optimal threshold for what constitutes a partial or fully repowered facility be determined and what considerations should be taken into account regarding the repowering of different resource types?	N/A
What considerations should be taken into account for new-build DERs?	<p>Technology Type (non-emitting, vs. emitting)</p> <p>Program to allow municipalities or owners of large buildings to install rooftop solar and sell excess back to the local grid (revive Microfit)</p> <p>Potentially reducing the minimum project size for DERs or allowing for multiple DER projects to be aggregated together.</p>
Please express any interest and opportunities for uprates and/or expansions at any of your existing facilities.	Municipality has plans for renewable projects. Wondering if aggregation of projects across municipal sites is eligible.

## LT2 RFP Design Considerations – System Congestion and Deliverability Approach

Topic	Feedback
<p>What early system congestion information do proponents need to guide them in choosing the location of their projects and when is this needed by within the procurement cycle?</p>	<p>System congestion information should be provided to municipalities affected. Information regarding whether system congestion improves based on the completion of projects currently under construction. This will benefit municipalities in understanding the full picture regarding system constraints in their area. This will allow municipalities to engage with the government in prioritizing projects and/or funds for constrained areas.</p> <p>After Windsor-Essex was identified as a priority zone (West of Chatham) as part of the ELT1 RFP with projects receiving 4 rated criteria points based on location, only 195MW was awarded to Windsor-Essex area projects (5 projects).</p> <p>As the area is currently awaiting the completion of several projects between 2025 and 2030, what impact will these facilities have on future procurements?</p> <p style="padding-left: 40px;">LT1 saw only 17 of 103 projects pass (16.5%) in the WEST zone, while other zones across the province saw pass rates between 89% and 100%. IESO explained that most of the available connection room west of London was taken up by successful E-LT1 contracts. As the start date for LT1 (2027) is after the in-service date for the Chatham-to-Leamington transmission line (2024-2025), what impact does the introduction of transmission facilities have on system congestion?</p> <p style="padding-left: 40px;">Perceived disconnect between local demand and the ability to connect projects to the system.</p> <p>Other Considerations (slide 51). Recommend that system congestion information be used in bulk, regional, and distribution planning so that areas with known congestion issues create implementation plans to remove system bottlenecks. Otherwise, these areas will continue to lag the rest of the province in new generation infrastructure.</p>

Topic	Feedback
Do you have any general suggestions for how to approach deliverability evaluation in the LT2 RFP?	Perform deliverability evaluations early in the process. With in-service dates of 2029, allow for discussion with the transmitter, LDCs and municipalities about the level of deficiency and opportunities to rectify.

## LT2 RFP Design Considerations – General Feedback

Topic	Feedback
Do you have any comments regarding the impacts that agricultural land-use limitations may have on project development?	<p>Support efforts to limit development on prime agricultural lands. Projects should endeavor to build on commercial or industrial lands as laid out by municipalities.</p> <p>Prime agricultural lands should be avoided for project siting and should only be considered as a last resort, and in consultation with municipalities and interested stakeholders.</p>
Do you have any comments regarding what evaluation criteria can be utilized to evaluate project readiness, given tight timelines and reliability needs?	LT2 has a single evaluation - Indigenous participation. Evaluation criteria has evolved since E-LT1 with a number of criteria becoming mandatory criterion for LT2 (i.e. Municipal support). Recommend multiple criteria for evaluating project readiness but understand it may be a challenge with the change in eligible technologies.
Do you have input on the proposed mechanism for valuing Indigenous participation?	Support providing opportunities for indigenous participation by indigenous groups directly impacted by the proposed projects.
Are there any other rated criteria that should be considered?	N/A

## Long Lead Time Resources

Topic	Feedback
Does the proposed approach to enabling long-lead time resources enable meaningful participation or sufficient certainty?	Providing allowances for long-lead time resources may encourage additional proponents to participate in procurements. Allowing for staggered date of commercial operation (COD) in procurement, provides flexibility as long-lead items can disqualify a project for a particular procurement.

Topic	Feedback
What additional considerations should the IESO contemplate for enabling broader participation from long-lead time resources?	N/A

## Revenue Model

Topic	Feedback
As a potential proponent, are you generally supportive of the proposed Enhanced PPA revenue model? Are there any other considerations that the IESO should look into further with regards to the revenue model?	N/A

## General Comments/Feedback

This may be beyond the scope of individual procurements, but recommend the IESO track, monitor, and report on how demand will be met (i.e. % existing generation, % new generation, % purchased services (i.e. Quebec hydro), % conservation, % other, and gap remaining)