

# Feedback Form

## Long-Term 2 (LT2) RFP – February 15, 2024

### Feedback Provided by:

Name: Shoshana Pasternak

Title: Associate, Government Affairs

Organization: Invenergy

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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 February 1, 2024, 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 [engagement@ieso.ca](mailto:engagement@ieso.ca) by February 15, 2024.**

## Revenue Model

Topic	Feedback
<p>Do you have any additional comments regarding the revenue model, particularly with regards to the following: Deeming energy market revenues based on real-time locational marginal prices (LMP), as opposed to the IESO's recommendation of basing this on the day-ahead LMP. (Slides 19-21)</p> <ul style="list-style-type: none"> <li>The optionality of using either a simple average day-ahead price or weighted average LMP, with the latter including hours where the resource was scheduled day-ahead in a given month. (Slides 22-23)</li> <li>Including monthly production factors that on average equate to the annual production factor, in order to further account for seasonality. (Slides 24-26)</li> </ul>	<p>Invenergy is taking time to assess and understand the risks of the Enhanced PPA proposal. We understand some members of the industry have raised concerns that this approach could have an impact on bid prices and a negative impact on the ratepayer. We would like to work with the IESO to mitigate that risk. Given the importance of the proposed revenue model and the IESO's intent to use the same model for future long-term procurements we encourage the IESO's report back to the Minister to not include specific technical recommendations around the model and to consider more flexibility to refine it to benefit both the ratepayer and bidders.</p> <p>In response to IESO's specific questions, Invenergy strongly supports the use of a weighted average LMP as opposed to a simple average day-ahead price and the use of monthly production factors to account for seasonality.</p>

## DERs

Topic	Feedback
<p>Do you have any comments regarding eligibility requirements for DERs of other general comments?</p>	<p>n/a</p>

## Capacity Resources

Topic	Feedback
<p>Do you have any comments regarding considerations for acquiring additional capacity resources, and utilizing a multi-stream approach (energy and capacity streams)?</p>	<p>We would appreciate more clarity on how hybrid facilities will be treated and whether the IESO is interested in co-located or integrated battery storage. We understand the IESO anticipates future capacity needs, in order for businesses to make investment decisions the IESO would benefit from sharing that information at the earliest possible point.</p>

## LT2 Deliverability

Topic	Feedback
Do you have any comments on early deliverability data and evaluation stage deliverability?	<p>We are supportive of the release of data including region-specific capacity. The more information the IESO is able to provide the easier it will be to site resources.</p> <p>We would appreciate the IESO providing more clarity on how much data will be provided and when it will be released.</p> <p>IESO should provide additional guidance on what assumptions are used when running the deliverability test and provide that information early in the process.</p>

## Repowering

Topic	Feedback
Do you have any comments around repowering participation?	We believe IESO should require an increase of 20% capacity to qualify as a re-powered facility and require local governing support for re-powered facilities to ensure community support.

## Long Lead-Time Resources

Topic	Feedback
Do you have any comments on enabling long-lead time resources?	n/a

## General Comments/Feedback