

Feedback Form

Long-Term 2 (LT2) RFP – April 4, 2024

Feedback Provided by:

Name: Ryan Dube

Title: Atura Power

Organization: Project Manager – Technical Development

Email: [REDACTED]

Date: 2024-04-23

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 April 4, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the 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 by April 23, 2024.

Enhanced Power Purchase Agreement (E-PPA) Revenue Model: Proposed Modifications

Topic	Feedback
Do you have any comments regarding use of monthly production factors for the calculation of deemed energy revenues?	<p>Atura Power appreciates the transition to using monthly imputed production factors for the calculation of deemed energy revenues, recognizing it as a positive development that allows for more accurate and timely adjustments in revenue calculations.</p> <p>Atura Power suggests that IESO consider a degradation mechanism or allow for proponents to vary the production factor over the life of the contract.</p>
Do you have any comments regarding use of the Forecasted Weighted Average Price (FWAP)?	<p>The central forecast should provide clearer distinctions between different technological production profiles. It currently relies on weather data; however, further clarification is needed on the assumptions made about technology, particularly concerning variations in facility design parameters.</p> <p>There needs to be greater clarity on how LT2 proposals will be evaluated, including the disclosure of price forecasts and whether a weighted average zonal price will be used in proposal evaluations.</p>
Do you have any comments or suggestions on further mitigating perceived risks associated with VG participation in the DAM?	<p>IESO should publish data comparing historically forecasted energy outputs versus actual day-ahead and real-time data for wind and solar over the past five years. This should be done for each transmission-connected facility to enhance transparency and forecasting accuracy.</p>

LT2 RFP & Contract: Key Provisions

Topic	Feedback
Do you have any comments regarding the use of minimum production factors during proposal evaluation?	N/A

Topic	Feedback
Do you have any comments regarding the application of the non-performance charge?	N/A
Do you have any comments regarding the treatment of outages under the LT2 Contract?	N/A
Do you have any comments regarding the payback of Deemed Market Revenues greater than the Monthly Revenue Requirement?	N/A

MT2 RFP

Topic	Feedback
Do you have any comments regarding the IESO's considerations on the MT2 RFP, including timing, eligibility, and the interplay between repowering and the MT2 and LT2 RFPs?	N/A

Long Lead Time Resources

Topic	Feedback
Do you have any comments regarding the IESO's considerations on Long Lead Time Resources, including timing, eligibility, targets, and term?	N/A

General Comments/Feedback

Municipal Engagement:

- A formalized process should be established for municipalities to request meetings with IESO. This should include a clear presentation structure to aid municipalities in understanding the information provided, thereby enhancing decision-making at the municipal level.
- If a municipality provides pre-bid support and removes it after the bid but before the award, the implications of this practice need to be clearly defined and understood.

LT2 RFP Engagement:

- It would be beneficial for IESO to consider adopting a more structured approach in its engagements with proponents in LT2. This could involve the establishment of a structured engagement process that helpfully outlines topics, frequency, and timing. Additionally, enhancing the clarity in how decisions are communicated could further improve these interactions.

RFP Target for Energy:

- Atura Power advocates for the shift from MW to TWh in measuring energy procurement targets under the RFP. This change would better reflect the actual energy delivered to the grid, aligning procurement strategies with real-world energy production and consumption patterns.

Additional Feedback on Connection Guidance for LT2 RFP

- Atura Power notes the recent release of the connection guidance document by IESO, which does not consider the projects that have been successfully awarded under the LT1 RFP. Given the potential impact and dependencies between LT1 project outcomes and future LT2 proposals, we recommend that the IESO commits to updating the connection guidance document promptly following the announcement of LT1 results. This update would ensure that all proponents are working with the most current and relevant information, facilitating more informed and strategically aligned proposal submissions for LT2.
- Will the HONI capacity evaluation tool be updated to align with the connection guidance provided for LT2 and to incorporate LT1 RFP contracts post offer.