

# Feedback Form

## Long-Term 2 (LT2) RFP – May 23, 2024

### Feedback Provided by:

Name: Shoshana Pasternak

Title: Senior Associate

Organization: Invenergy

Email: [REDACTED]

Date: June 7, 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 May 23, 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](mailto:engagement@ieso.ca) by June 7, 2024.**

## LT2 RFP Energy + Capacity Streams

Topic	Feedback
<p>Do you have any questions or comments regarding the clarifications the IESO provided regarding the targets, timing, eligibility or other details of the LT2 RFP Energy and Capacity streams?</p>	<p>We require more certainty to meet the timelines proposed such as policy around Crown land so that we can collect the necessary wind data.</p> <p>Similar to previous procurements, there is a lack of transparency on the deliverability test process including locational/siting deliverability. The IESO needs to share whether the deliverability test conducted in LT1 is valid for LT2 and provide any information about its approach to assessing deliverability. We believe that the IESO should take an approach that allows for proponents to invest in system upgrades or adjust the MWs submitted to make their projects deliverable. This will maximize competition and ensure good projects are able to get built, delivering value to ratepayers.</p> <p>The IESO has stated that there will be a defined process to access interconnection data, as it will not be publicly available. To facilitate timely access to this data once released, we recommend that any predetermined administrative requirements, such as signing a non-disclosure agreement (NDA), should be communicated as soon as possible. Providing clarity on these processes early will allow stakeholders to complete any necessary steps promptly, enabling immediate access to the data when it becomes available.</p> <p>We also support the inclusion of both energy and capacity streams.</p>

## Long-Lead Time Resources Procurement

Topic	Feedback
<p>Do you have any questions or comments regarding the clarifications the IESO provided regarding the targets, timing, eligibility or other details of the Long Lead Time Resources Procurement?</p>	<p>The IESO should clarify the duration required for long lead time resources.</p> <p>We support a competitive procurement for long lead time resources rather than bi-laterals for technologies that should/can compete.</p>

## MT2 RFP

Topic	Feedback
Do you have any questions or comments regarding the clarifications the IESO provided regarding the targets, timing, eligibility or other details of the MT2 RFP?	N/A

## LT2 RFP Preliminary Connection Guidance Follow-Up

Topic	Feedback
Do you have recommendations for; addressing the previous feedback received; version 2 of the Guidance Document; and most specifically on the LT2 RFP capacity stream delivery approach the IESO is proposing.	Given the absence of preliminary deliverability test requirements, we support the IESO's pre-consultation approach. We encourage establishing a streamlined process for pre-consultation with both the IESO and Hydro One. Specifically, a scheduled discussion window with both the IESO and Hydro One would enable proponents to pose specific questions on published documents. This will help in understanding site-specific deliverability constraints, ideally through a feasibility report or study. The final deliverability test is currently very opaque in its assumptions or results. Providing access to this data or methodology will help proponents submit viable bids.

## E-PPA Revenue Model and E-PPA Energy Market Settlement Examples

Topic	Feedback
Do you have any questions or comments regarding the modified, "protected" version of the Enhanced Power Purchase Agreement (E-PPA) that the IESO has proposed?	<p>We see the introduction of the "protection" mechanism as a welcome solution to provide downside protection for those proponents who are not comfortable managing the DA to RT settlement risk.</p> <p>Notwithstanding, to incentivize full participation in the DAM, we believe that the IESO should award rated criteria points to those proponents who elect not to benefit from this protection.</p>

## General Comments/Feedback