

Feedback Form

Long-Term 2 RFP – June 13, 2024

Feedback Provided by:

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Date: June 26, 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 June 13, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the LT RFP [engagement web page](#).

Please submit feedback to engagement@ieso.ca by June 27, 2024.

Developing on Agricultural Land

Topic	Feedback
<p>Do you have any comments regarding the provision proposed within the Ministerial letter to: "Provide rated criteria points for projects that avoid prime agricultural areas."</p>	<p>The government's stated objective is the protection of prime agricultural areas; thus rated criteria points that favour proposed projects not on such areas make sense.</p>
<p>Do you have any comments and considerations regarding the implementation of the Agricultural Impact Assessment (AIA)?</p>	<p>A municipality should not be expected to extend support for an energy project on prime agricultural areas without an AIA, properly prepared, and peer reviewed by neutral third party experts. This is essential for the municipality to make an informed decision on a support resolution. If the AIA is treated as an afterthought after a project has been approved, it could become a source of conflict if a municipality is not satisfied with a proponent's AIA, and refuses to sign off on it. I found the answers to the question "what happens if a municipality considers an AIA to be bad?" to be vague and not exactly unequivocal. This uncertainty can be avoided if an AIA is deemed necessary for a project proposal and for approaching a municipality for a support resolution.</p>

Resource Eligibility

Topic	Feedback
<p>Repowering considerations: Do you have any feedback to share regarding other resource types opportunities for repowering/refurbishment under the LT2?</p>	<p>No comment</p>
<p>Hybrid considerations: Do you have any feedback to share regarding hybridized facilities under the LT2?</p>	<p>No comment</p>

LT2 Contract Provisions

Topic	Feedback
<p>Performance Obligations: Do you have any feedback to share regarding minimum Imputed Production Factor thresholds or the proposed calculation approach for Non-Performance Charges?</p>	<p>The 20% minimum imputed production factors for wind seems a bit low. The IESO’s current reliability outlook (January 2024 to June 2025) indicates a yearly average output of about 29% for wind. This includes projects with older turbine models that are not as efficient as newer ones. Any future wind installations would deploy turbine models that are more efficient.</p> <p>I would caution against using production factors that are at the maximum claimed by the manufacturers. That would not provide a buffer in the event that some, or all, wind turbines in a project have to be partially curtailed in the event of noise issues.</p> <p>I suggest a minimum imputed production factor threshold of 25% for new wind projects.</p>
<p>Excess Deemed Market Revenues: Do you have any comments regarding the percentage of the negative Grid Reliability Payment that is to be paid back?</p>	<p>I will repeat my earlier comment that suppliers should not be paid for production that was not delivered due to errors in their imputed production factors. 100% of excess deemed market revenue should be paid back for each month when it occurs.</p>

General Comments/Feedback