

Feedback Form

Long-Term 2 RFP – July 4, 2024

Feedback Provided by:

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Date: July 19, 2021

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 July 4, 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 July 19, 2024.

Please attach/append this feedback to Paul Young's communication of July 18, 2024. The two feedback forms shall be listed as Orillia Power Generation's feedback. Thank you.

MT2 RFP

Topic	Feedback
Do you have any feedback regarding resource eligibility under the MT2 RFP?	none
Do you have any feedback regarding the IESO's proposed method of determining the procurement target for the MT2 RFP?	As per Paul Young's feedback
Do you have any feedback regarding the contract structure or term length under the MT2 RFP?	none
Do you have any feedback regarding capacity qualification for the MT2 RFP?	none
Do you have any feedback regarding proposal submission fees and proposal security requirements for the MT2 RFP?	none
Do you have any feedback to share regarding the IESO's proposed method of proposal evaluation under the MT2 RFP	none

LT2 RFP Capacity Stream

Topic	Feedback
Do you have any feedback to share regarding the capacity stream under the LT2 RFP?	As per Paul Young's feedback.

LT2 RFP Proposal Evaluation

Topic	Feedback
Do you have any feedback to share regarding the IESO's proposed method of proposal evaluation under the LT2 RFP?	<p>In addition to Paul Young's feedback.</p> <p>The presentation suggests that the Energy stream proposals will be, as they should, evaluated and awarded separately from the capacity stream. There is some uncertainty regarding the IESO's intentions on this subject that should be clarified.</p>

LT2 RFP Proposal Security

Topic	Feedback
Do you have any feedback to share regarding the proposal security requirements under the LT2 RFP?	<p>In addition to Paul Young's feedback.</p> <p>The proposal security requirements are unnecessarily inflated.</p> <p>It is understood that a security deposit is standard to ensure that proponents honor their commitments, however the deposit should be reasonable and mutually agreed to. In terms of a security deposit, the IESO should recognize that while this primarily addresses risk for the IESO there is little mechanism, aside from litigation, defined for proponents to manage risks associated with the IESO's cancellation of contracts. As an example, history as experienced in 2019 has established a distinct possibility that there is a risk that awarded contracts could be cancelled. Considering this distinct possibility, it is reasonable to suggest that the IESO's approach to security deposits be such that their apparent zero-risk tolerance approach be tempered to more of risk sharing objective.</p>

General Comments/Feedback

In addition to Paul Young's Feedback.

It is strongly suggested or requested that the IESO place a greater emphasis on providing clarity in defining a fair and objective proposal evaluation process. The IESO is requested to provide an explanation of how the procurement process will ensure competitive balance for 100% Municipally owned proponents and/or 100% Indigenous owned proponents or combination thereof. Presently,

the Federal Government's Clean Technology Tax credit of 30% is not available to projects which are 100% Municipal or Indigenous owned. The recognition that the financial benefits of 100% Municipal and/or Indigenous owned projects directly benefit Ontario communities is important when considering proposals. While it may not be appropriate for 100% Municipal or Indigenous owned projects to be afforded an advantage over private equity proponents, it is certainly inappropriate to construct a process where 100% Municipal or Indigenous owned projects are at a disadvantage. It is recognized that the IESO and the Provincial Government have little control over Federal government tax incentives, however they do have the ability to construct the LT2 procurement process to address known inequities.

In closing, Orillia Power Generation Corp. requests that the IESO design the LT2 procurement process in a manner that ensures the 30% CTC credit does not disadvantage 100% Municipal and/or Indigenous projects. It is suggested that this could be achieved through a proposal evaluation process that credits 100% Municipal and/or Indigenous owned projects relative to the 30% CTC credit afforded to others.