

# Feedback Form

## Long-Term 2 RFP – July 4, 2024

### Feedback Provided by:

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Date: July 18, 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 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](mailto:engagement@ieso.ca) by July 19, 2024.**

## MT2 RFP

Topic	Feedback
Do you have any feedback regarding resource eligibility under the MT2 RFP?	
Do you have any feedback regarding the IESO's proposed method of determining the procurement target for the MT2 RFP?	
Do you have any feedback regarding the contract structure or term length under the MT2 RFP?	See General Comments below
Do you have any feedback regarding capacity qualification for the MT2 RFP?	
Do you have any feedback regarding proposal submission fees and proposal security requirements for the MT2 RFP?	
Do you have any feedback to share regarding the IESO's proposed method of proposal evaluation under the MT2 RFP	See General Comments below

## LT2 RFP Capacity Stream

Topic	Feedback
Do you have any feedback to share regarding the capacity stream under the LT2 RFP?	

## 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?	

## LT2 RFP Proposal Security

Topic	Feedback
Do you have any feedback to share regarding the proposal security requirements under the LT2 RFP?	

## General Comments/Feedback

MEDIUM TERM PROCUREMENTS (MT2 RFP)

COMMUNITY SUPPORT RESOLUTIONS

Doing the July 4 engagement webinar, the IESO stated position was that a municipal support resolution is not required for MT2 RFP contracts. I would suggest that with the major procurements planned for the expected increased demand for electricity, the IESO risks alienating the municipalities by awarding Medium Term contracts without municipal participation and support.

Most of the concerns from municipalities and residents would undoubtedly be the about the 5-year contracts for wind turbine projects, approved under the Pre-Green Energy Act guidelines.

The MT1 RFP procurement included a 5-year capacity contract to the Amaranth wind project; also known as the Melancthon 1 wind project, the first phase of the much larger project. This contract was awarded without any discussion or consultation with the Township of Amaranth, the host municipality.

Awarding that Amaranth contract behind closed doors, with no input from the host municipality, is inconsistent with the IESO’s Community Engagement Principles, which includes statements such as:

“Strengthening processes for early and sustained engagements with local governments and the public.” “Providing local governments and communities with greater voice and responsibility.” “Bringing communities to the table.” “Linking local and provincial planning.”

Recommendation:

I URGE THE IESO TO INCLUDE A REQUIREMENT FOR A SUPPORT RESOLUTION FROM THE HOST MUNICIPALITY PRIOR TO AWARDING AN MT2 CONTRACT.

## TIMING

The IESO'S "expedited timeline" for the MT2 RFP procurement does not allow sufficient time for a proper discussion and evaluation of project proposals.

The IESO should not use haste as a reason to sidestep the host municipalities for the projects under consideration. Simply because a project has been in operation for a number of years does not mean that project does not have serious issues that should be addressed if a new contract is being considered.

### Recommendation:

All timelines for the MT2 RFP shown in slide 4 should be extended by at least 6 - 9 months to allow sufficient time for consultations with the affected municipalities.

## EVALUATION CRITERIA

The proposed evaluation of submissions, based solely on proposal price, is inadequate and an oversimplification.

Recommendations. Please note that this applies specifically to wind projects:

The evaluation process for MT2 RFP submissions for a wind project should include:

1... A review by the MECP of the projects' original noise impact assessment reports to determine if the procedures in the guidelines in place at the time were followed correctly. This would include the requirement in the 2004 "Interpretation For Applying MOE NPC Technical Publications to Wind Turbine Generators", that stipulates "Noise Impact Assessment 'under a 'worst case scenario' at the critical points of Reception", and with noise modelling "using the ISO 9613 method." Any deviations from the Interpretation Document, or the ISO 9613 methodology, should disqualify a project from consideration for an MT2 RFP contract.

2... A communication plan for discussions with the host municipality, prepared by the proponent, with at least one public town hall meeting, and a formal presentation to the municipal council.

3... A detailed plan by the proponent to address any concerns expressed by the municipality or its residents. This may include increasing noise barriers around transformer stations, or partially curtailing curtailing some turbines, as two examples.

4... A municipal support resolution

5... Proposal price

## SOME FINAL THOUGHTS - CAPACITY VS ENERGY STREAM CONTRACTS

If the MECP has not found any deviations from the 'Interpretation Document' or the ISO 9613 methodology; there may still be issues with older wind projects approved under the ECA protocol with less stringent noise regulations.

Some of these wind projects have garnered hundreds of complaints from nearby residents after startup.

I suggest that for the wind projects that were approved under the 2004 Interpretation Document, and have obtained a municipal support resolution after assuring residents that their concerns will be addressed, and are still being considered for an MT2 contract; any awarded contracts should be limited to the capacity stream only.

These capacity stream contracts should lower the "qualifying hours" for the projects from 16 hour business days (07:00 to 26:00 EST), down to 12 hour business days (07:00 to 19:00 EST). These reduced hours would still allow the IESO to draw from these projects during the peak demand hours if needed, while avoiding the night time hours when people are asleep; when ground level noise is usually lower; and when wind shear, with the resultant higher turbine noise emission, is higher.