

Feedback Form

Long-Term 2 RFP – July 24, 2024

Feedback Provided by:

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Following the LT2 RFP July 24, 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](#).

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 "Yes" below:

- Yes – there is confidential information, do not post**
- No – comfortable to publish to the IESO web page**

Please submit feedback to engagement@ieso.ca by August 9, 2024.

Draft LT2 Energy Contract

Topic	Feedback
<p>Do you have any comments regarding the calculation of the monthly payment information presented?</p>	<p>We question the use of annual average imputed production factor (IPF_{aa}) in the first bracket of the Monthly Payment Calculation (Revenue Requirement). This will introduce variations in the contract payments. Instead, Boralex suggests using monthly imputed production factor (IPF_m) for the calculation of both Revenue Requirement and Monthly Deemed Energy Market Revenue.</p> <p>Additionally, the Total Facility Forecast Revenue for Settlement Month (TFFR_m) should include negative intervals for intermittent resources, at least to a level equivalent to the value of Environmental Attributes.</p>
<p>Do you have any comments regarding the treatment of excess deemed revenues or analysis to share? Please attach any supporting information.</p>	<p>Boralex supports the IESO proposal to allow suppliers to keep a share of excess revenues in exchange for opting out of the DARTA.</p>
<p>Do you have any comments regarding the proposed approach to the performance obligations?</p>	<p>Boralex supports the removal of negative priced hours from the evaluation of Non-Performance Charges.</p>

LT2 Capacity Contract - High-Level Design Details

Topic	Feedback
<p>Do you have any comments or feedback regarding the design details presented for the Capacity Contract?</p>	<p>Boralex supports the IESO proposal of using a similar contract as the one for LT1-RFP.</p>

LT2 RFP Community Engagement Requirements

Topic	Feedback
<p>Do you have any comments or suggestions regarding the approach for community engagement?</p>	

General Comments/Feedback

It is important that municipalities get sufficient time to review proposed projects with relevant staff and hear back from communities before deciding on giving a municipal support resolution. To avoid overwhelming municipalities during the RFP process, proponents and the IESO should not be asking for rezoning of prime agricultural lands for ground mounted solar projects pre-bid. To offer full flexibility to both the proponents and municipalities, Boralex suggests that successful proponents who are awarded a contract be given around 18 months to go through zoning bylaw and official plan changes for their respective projects.

Requiring proponents to go through a rezoning process by the time they submit their bids is premature and it is likely many municipalities will not have the resources to conduct these extensive processes in such a short period of time. This proposed process is further complicated because proponents will have very little to show for the new rezoning requirement in terms of what the project will look like, supplier, or even an official contract. All these aspects are items that councils, planners, and residents will look for when proponents present their case for a rezoning change.

Boralex is concerned that this rezoning pre-bid process will place stress on proponents and municipalities. To alleviate concerns about awarding contracts on prime agricultural land, Boralex suggests adding wording in the Municipal Support Resolution if the proposed project is ground mounted solar on municipally zoned prime agricultural land. The wording would say that the municipality will work with the proponent on any zoning bylaw amendments or official plan amendments.