

Feedback Form

Long-Term 2 RFP – September 12, 2024

Feedback Provided by:

Name: Shelby Dockendorff

Title: Advisor, Public Affairs and Communications

Organization: Boralex Inc.

Email: [REDACTED]

Date: October 14, 2024

Following the LT2 RFP September 12, 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 [Long-Term RFP \(ieso.ca\)](#).

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 September 27, 2024.

LT2 RFP Deliverability Guidance – Update

Topic	Feedback
Do you have any feedback to share regarding the updated Preliminary Connection Guidance document?	
Do you have any feedback to share on the procedure to request access to the transmission system map or process to request pre-submission consultations?	
Do you have any feedback on the types of information that you would like to see in the LT2 Capacity RFP Guidance Document?	

LT2 RFP Design – Policy Considerations

Topic	Feedback
Do you have any feedback to share on the policy considerations outlined in the August 29, 2024, letter from the Minister of Energy and Electrification to the IESO?	Boralex is supportive of the IESO updating their cadence of the long-term procurements to address the increase in demand. To help meet the new cadenced procurement windows, we ask the IESO to make sure municipalities, Indigenous communities, and the Government of Ontario are aware of the changes for dates, timing, and the increase in need. Having a full understanding of the demand Ontario will be experiencing, and a clear expectation of timelines will help everyone work together to meet the procurement targets.

Draft LT2 Energy RFP and Contract

Topic	Feedback
Do you have any feedback regarding the recently posted LT2(e) RFP?	

Topic	Feedback
Do you have any feedback regarding the recently posted second version of the LT2(e) Contract?	
Do you have any feedback to share on the proposed Rated Criteria for the LT2(e) RFP?	
Do you have any feedback to share on the proposed mandatory requirements for the LT2(e) RFP, including Municipal and Indigenous Support Resolutions requirements as well as requirements for siting projects on Crown Land?	Boralex is supportive of the mandatory requirements for Municipal Support and Indigenous Support Resolutions. We are supportive of the Crown Land siting requirements but want to note again that the process to apply to just put up met towers is incredibly extensive and confusing. We ask that the IESO work with the Ministry of Natural Resources to streamline the Crown Land process and find ways to shorten the wait times so proponents are able to have enough met tower data to participate in LT2 and future procurements.
Do you have any feedback to share on the Indigenous and Community Engagement requirements for the LT2(e) RFP?	Boralex is supportive of the Indigenous and Community Engagement requirements for the LT2(e) RFP.

Key Themes from Recent Stakeholder Feedback

Topic	Feedback
Do you have any feedback to share on the IESO responses to recent stakeholder feedback?	Boralex still maintains that there will be difficulties in asking municipalities to re-zone areas for projects before contracts are awarded. This will require much effort from planning departments that ultimately might not result in projects moving forward if a contract isn't awarded after a rezoning occurs. Rezoning is a lengthy process, and it would provide a level of comfort to municipalities that a project going through a rezoning process has a higher assurance of being actualized versus during the proposal stage. This also does not protect Prime Agricultural Areas as there is a risk of large amounts of lands being rezoned and then not receiving a contract, proponents not going forward with a project and leaving these large agricultural acreages rezoned and unprotected.

General Comments/Feedback

The recent ruling by the Ministry of Natural Resources for Applicant of Record (AoR) Status for Crown Land is presenting numerous problems. One issue is that the AoR status is non-transferrable. This limits proponents' opportunities to work together on a potential site, and more importantly, limits opportunities for local First Nations to become equity partners in projects if the original AoR is held in a parent company. We ask that the AoR policy be reviewed and allow for legacy holders to transfer the AoR to special purpose vehicles in order to allow for Indigenous partnerships in projects which we believe is the intent of the IESO procure.