

# Feedback Form

## Long-Term 2 RFP – September 12, 2024

### Feedback Provided by:

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Date: September 25, 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 \(ieso.ca\)](https://www.ieso.ca/Long-Term-RFP).

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](mailto:engagement@ieso.ca) by September 27, 2024.**

## LT2 RFP Deliverability Guidance – Update

Topic	Feedback
<p>Do you have any feedback to share regarding the updated Preliminary Connection Guidance document?</p>	<p>While it gives a good general understanding of the transmission network and its constraints, we still believe a more detailed information on the available capacity on each transmission line would really help developers to concentrate their efforts where capacity is available. The document is too generic in its actual form and neither IESO and HONI are ready to discuss specific projects with developers.</p> <p>The guidance remains woefully inadequate for proponents to develop and propose projects with confidence – it continues to be a serious risk and barrier to cost-effective development. Other jurisdictions including BC and Alberta provide much more detailed station and line-level connection maps and up-to-date circuit data. We strongly urge the IESO to rapidly implement a mechanism for companies to determine where to connect and how to optimize project size.</p>
<p>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?</p>	<p>I would suggest that any pre-submission consultations should be able to get into project specific interconnection details to analyze the feasibility of connecting to specific circuits. This would necessarily need to be able to go into far more detail than what was provided via the transmission system map and deliverability guidance document previously published.</p> <p>The transmission map should also be available in shapefiles in order to integrate it into GIS tools. The PDF map is not accurate enough and we also wonder if all transmission lines and circuits are shown or if there are some missing.</p> <p>The same comment would be applicable to the Areas to Avoid and Limited Areas shown in the Guidance Document. We understand these areas might be approximate but it would nonetheless be helpful to better locate them in a GIS tool.</p>

Topic	Feedback
Do you have any feedback on the types of information that you would like to see in the LT2 Capacity RFP Guidance Document?	Nick? Philippe?

## 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?	<p>We are encouraged to see LT2 taking shape, and that there's a real political will to have sequential RFPs in the foreseeable future. We strongly support the idea presented during the webinar of a series of Proposal submission windows that would occur in quicker succession, allowing project developers to target the submission window that aligns with their project's development timelines more effectively.</p> <p>We also recall that in a previous webinar, it was mentioned that a partial update on the APO would be made in September 2024, resulting in larger energy needs than the actual 5000MW by 2034. We encourage IESO to make this update so that developers can also have a more visibility on their future efforts.</p>

## Draft LT2 Energy RFP and Contract

Topic	Feedback
Do you have any feedback regarding the recently posted LT2(e) RFP?	Given the recent inclusion of gas generation in the procurement streams, will there be any incentives given to clean generation options?
Do you have any feedback regarding the recently posted second version of the LT2(e) Contract?	Given the recent inclusion of gas generation in the procurement streams, we would like to confirm, and encourage, that the procurement criteria, requirements, and evaluation represent a level playing field for all technologies to compete and remain technology agnostic and transparent across the procurement streams.

<b>Topic</b>	<b>Feedback</b>
Do you have any feedback to share on the proposed Rated Criteria for the LT2(e) RFP?	While we understand the technology agnostic approach aims at procuring resources at a competitive price, we feel the inclusion of gas generation will have a negative impact on the province's goal to be carbon neutral within the next few decades. This is why we believe these projects should be eligible for the capacity stream only, where their sporadic use will have a lesser impact on carbon emissions. Nevertheless, should gas generation remain eligible within either of the procurement streams, a rated criteria should be added in favor of non-emitting resources to encourage their selection.

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?

Please confirm that the term "Unorganized Areas" as used in the webinar presentation of Sept. 12 has the same meaning as the definition of "Unorganized Lands" in the RFP document.

Furthermore, while we can understand prioritizing projects on non-prime agricultural areas through rated criteria points, and even allowing projects on agricultural lands provided they conduct an agricultural impact study to the satisfaction of the host community, it seems odd that given those additional requirements (including a letter of municipal support) that solar not be allowed on agricultural lands. In some municipalities, agricultural zoning allows for solar as a permitted land use. Furthermore, if an AIS is required along with municipal support, it seems it would go against the municipalities interest to restrict the development of a solar site, should they support such projects. Given the IESO's intent to let municipalities have their say on which projects are approved in their communities, this siting requirement really seems to swing far in the opposite direction and ultimately against the guiding intent by imposing this restriction. Furthermore, it is our understanding that solar would be allowed on agriculturally zoned parcels provided the municipality re-zones the parcels prior to the bid deadline. However, this is realistically improbable as rezoning can be quite a process for the municipality, and therefore would be extremely unlikely to happen without prior having been successful in a project bid. It is therefore our request that the IESO consider accepting the eligibility of solar projects on prime agricultural lands provided they can (1) secure rights via the landowner(s) prior to the bid, (2) obtain a municipal support resolution in favour of the project, as well as (3) a municipal commitment to rezone the parcels as part of their MSR and (4) commit the developer to conduct an AIS to the satisfaction of the municipality **should the project be successful in the LT2 tender.** This would reinforce the intent to keep municipalities in the drivers seat when it comes to selecting and approving projects within their communities, as well as provide incentive via rated criteria points, while supporting robust municipal and community engagement requirements to foster strong community support.

Topic	Feedback
Do you have any feedback to share on 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?	

### General Comments/Feedback

We request more information from the MNRF to clarify the timeline to get their approval on the Crown Land Site Report. Also, approval timelines should be the same at each regional level to avoid any confusion.