

Feedback Form

Long-Term 2 RFP – October 22, 2024

Feedback Provided by:

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Following the LT2 RFP October 22, 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 November 8, 2024.

LT2 RFP Multiple Submission Window Approach

Design Considerations	Feedback
Do you have any feedback regarding the multiple submission window approach being proposed for LT2?	Boralex is supportive of the multiple submission window approach because it provides certainty in a procurement roadmap, allowing for flexibility and more opportunities for proponents to participate. The multiple windows will also help with the challenges being experienced with the Crown Land Predevelopment applications due to a lengthy MNR process and inconsistent district office feedback. The multiple windows approach provides certainty that projects can be bid into multiple rounds if unsuccessful or diversify projects to participate in all windows ensuring the best projects are bid.
Specifically: Do you have any comments around the proposed timeline for the first submission window?	For wind projects on land covered by Indigenous/Crown treaties, we expect that there will be 2 tranches of sites available, historical sites with multiple years of on-site wind measurement, and new sites with less than 1 year of wind measurement. The latter will likely be missing measurements for the winter peak season due to MNR delay.
Do you have any comments or information for the IESO to consider in relation to the way that procurement documents will be updated and shared between submission windows?	The IESO should provide information as soon as possible and remain as flexible as possible to ensure current requirements or definitions do not limit potential procurement in future rounds.
Do you have any comments around obtaining Indigenous Support Confirmations and Municipal Support Confirmations across submission windows?	Boralex is supportive of Indigenous and Municipal Support Confirmation and believe these confirmations should be upheld across all the submission windows. For instance, if a MSC is received in LT2 Window 1 it should be valid for bid submission in all LT2 Windows unless rescinded.
Do you have any comments around the consideration of overall targets and allocation between submission windows?	Boralex encourages the IESO to allow for flexibility to be able to procure more than the individual procurement window's targeted amounts as well as overall target amount to ensure the most cost-effective projects for rate payers are awarded.
Deliverability	Feedback
Do you have any comments for the IESO to consider regarding deliverability under the new windowed approach?	Boralex requests additional information on how deliverability will be assessed and prioritized under the new windowed approach. Further, all possible constraints known to transmitters must be made available to proponents to avoid wasted effort and major surprises during bid assessment.

Ministry of Natural Resources Presentation:

Renewable Energy on Crown Land Considerations	Feedback

<p>Do you have any comments in relation to the information presented by MNR regarding Crown Land considerations for renewable energy projects?</p>	<p>The current Crown land process has been exceedingly difficult to navigate in a timely matter and has created obstacles for new MET tower installations. The predevelopment roadmap mimics the requirements needed for the installation of wind turbines themselves but does not consider the small footprint and temporary nature of the installation of a met tower. A more expedient approach is needed for met tower installation that is separate from the process required to install wind turbines. There should also be service guarantees for the review period for submissions. We are concerned that any proponent trying to install new MET towers will not be able to acquire enough data to submit for LT2 Window 1 or will need to add a resource uncertainty premium into the bid price. At the pace that the current crown land process is taking, this will lead to a less competitive round for the IESO and ratepayers.</p>
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Predevelopment Roadmap	Feedback
Do you have any comments regarding the information presented by MNR regarding the predevelopment roadmap?	<p>The information presented during the webinar regarding the predevelopment roadmap was limited and did not reflect our experience to date with the level of work required for submission and approval of a predevelopment submission.</p> <p>The overall challenge with the process is the inconsistency dealt with at the district office level when attempting to use the predevelopment roadmap. Depending on the bureaucratic process at the district office, more information may be required than what is outlined in the roadmap, making for long lead times and back and forth communications between staff members and the proponent. Certain district offices require a higher level of detail which result in additional studies being required on the project than what was not identified in the roadmap, which results in lengthy submission responses. A consistent approach across districts is recommended.</p> <p>When the project is finally submitted to the Natural Resources Information Portal (NRIP), the proponent is not given access to the submission and therefore cannot follow along to see where their applications are in the process, providing long waiting times and a considerable amount of uncertainty. It is recommended that the MNR create a centralized database for submissions that can be tracked and provide service guarantees for review timelines.</p>

General Comments/Feedback