Feedback Form

Long-Term 2 RFP – October 22, 2024

Feedback Provided by:

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Date: November 8, 2024

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**
X	**No – comfortable to publish to the IESO web page**

Please submit feedback to engagement@ieso.ca by November 8, 2024.

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LT2 RFP Multiple Submission Window Approach

Design Considerations	Feedback
Do you have any feedback regarding the multiple submission window approach being proposed for LT2?	In September 2024, MNR decided to provide a "one-time opportunity" to recognize the exclusive site rights of legacy Applicants of Record (AoRs) for the LT2 Energy Stream RFP. Holders of legacy AoRs who indicated their interest to MNR by October 25, 2024, were able to maintain an exclusive right to pursue MNR approvals for the legacy AoR site. Now that IESO proposes to extend LT2 through the windowed approach, we are seeking clarification from MNR and the IESO on whether exclusive legacy AoR status will be maintained for all windows of the LT2 or only for window #1.
Specifically: Do you have any comments around the proposed timeline for the first submission window?	No comments.
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?	We support the intention for documents remaining substantially the same across windows to provide certainty, transparency and predictability to proponents. However, this should not preclude improvements being made based on learnings from previous windows. Any advance signals/information that the IESO can provide on changes that are being considered for future windows will help proponents to incorporate those changes to project design.
Do you have any comments around obtaining Indigenous Support Confirmations and Municipal Support Confirmations across submission windows?	We support the intention IESO stated on the webinar for Indigenous and Municipal Support Confirmations to remain valid across all LT2 submission windows, to avoid overwhelming those parties with duplicative requests. I.e., support confirmations should apply to the project, not the window.
Do you have any comments around the consideration of overall targets and allocation between submission windows?	We recommend allocating a lower percentage of the total LT2 target to window #1. This would recognize the difficulties projects have experienced to advance quickly under current policies and processes, as well as the time required to develop the strong relationships needed to secure Indigenous and Municipal project support.
Deliverability	**Feedback**
Do you have any comments for the IESO to consider regarding deliverability under the new windowed approach?	We continue to strongly urge the IESO to provide as much detailed connection and deliverability information as possible so that proponents have as much deliverability certainty as possible for proposed projects. This would include incorporating contract awards under each window into deliverability information ahead of the following window bid deadline. We ask the IESO to comment on how the window approach will affect the Guidance document that references LT2 and not LT2 window #1, e.g., Will there be a yearly guidance document posted?

Ministry of Natural Resources Presentation:

Renewable Energy on Crown Land Considerations	Feedback
Do you have any comments in relation to the information presented by MNR regarding Crown Land considerations for renewable energy projects?	We appreciate the work being done at MNR to develop guidance and processes for projects on Crown Land. We recommend that MNR finalize the documents required for MNR approvals (Crown Land Site Report, Approval and Permit Requirements, etc.) as early as possible to facilitate the ability of proponents to meet IESO timelines and respond to Ontario's pressing need for more clean energy. The proposed approach to engagement would require consultation with all stakeholders before even early project steps can be undertaken (such as installing met masts to determine whether a project site is viable). This is heavily front-loaded, duplicates the IESO's municipal support resolution requirement, and is likely to create further project delays. We suggest that to appropriately balance stakeholder input with very early project activities, municipal engagement requirements before met mast installation should be removed to leave the timing in the hands of the Indigenous co-owners and project developers who will still be required to engage the municipality if a project is deemed viable to proceed to development. In addition, we suggest that MNR establish a timeline for reasonable stakeholder responses, after which if no responses have been received then an activity can proceed.

Predevelopment Roadmap	Feedback
Do you have any comments regarding the information presented by MNR regarding the predevelopment roadmap?	No comments.

General Comments/Feedback

Agricultural lands – There is a continued lack of clarity around how siting on Prime Agricultural Areas and the Agricultural Impact Assessments (AIA) will function in LT2. We request additional clarity in particular on the amended definition of Prime Agricultural Areas in the LT2 RFP ("has the meaning given to that term in any Official Plan and includes any substantially similar designation in any Official Plan for agricultural land use designation purposes based on the definition of "Prime Agricultural Area" in the Provincial Planning Statement, 2024.") We look forward to the November 21 webinar on this topic.

MNR organization – We support the concept of centralizing the efforts of the Regional and District offices to expedite renewable energy and storage project approvals. From our experience to date, many regional MNR offices are already understaffed and due to the scale of Ontario's energy need, we expect they could be quickly overwhelmed with developer applications. Creating a dedicated team or taskforce who have some familiarity with renewable energy and storage technologies to take on this work would ensure that MNR is best positioned to facilitate projects being built on time.