

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
<p>Do you have any feedback regarding the multiple submission window approach being proposed for LT2?</p>	<p>SWEB is encouraged to see the multiple window approach, but agrees with CanREA’s concerns regarding uncertainties around how deliverability will be assessed, prioritized and communicated under the windowed approach. SWEB also agrees with CanREA’s concerns about the uncertainties regarding various siting-related policies and rules for the procurements, and their potential impact on availability of appropriate sites.</p>
<p>Specifically: Do you have any comments around the proposed timeline for the first submission window?</p>	<p>Given the proposed timing of the first submission window opening in Q3 2025, and the delays SWEB and other developers are experiencing in regard to siting wind measurement equipment and permitting wind projects with the MNRF, is the intent of the IESO to target the first submission window towards non-wind generating projects, such as solar?</p>
<p>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?</p>	<p>No comments</p>
<p>Do you have any comments around obtaining Indigenous Support Confirmations and Municipal Support Confirmations across submission windows?</p>	<p>SWEB recommends that Indigenous Support Confirmations and Municipal Support Confirmations, once achieved for a project, should apply across multiple submission windows.</p> <p>In other words, if a project with Indigenous Support Confirmation and/or Municipal Support Confirmation is submitted in one window and is unsuccessful, it should be allowed to resubmit said confirmation in a later window for the same project.</p> <p>Additionally, if there are minor changes to a project which has already achieved Indigenous Support Confirmation and/or Municipal Support Confirmation, and has had to implement these project changes based on evaluation feedback from the IESO, will new confirmations be required?</p> <p>Furthermore, would the IESO consider creating a separate “Project Amendment Confirmation” that could be used in addition to the original with Indigenous Support Confirmations and/or Municipal Support Confirmations to show proof of continued project engagement and the evolution of project support?</p>

<p>Do you have any comments around the consideration of overall targets and allocation between submission windows?</p>	<p>SWEB recommends that the IESO provide clarity regarding procurement targets for each submission window and if these targets are fixed or flexible, and if targets for latter submission windows could be affected based on more or less generation and/or capacity projects being procured in earlier submission windows.</p> <p>Additionally, SWEB supports CanREA’s recommendation that the IESO should intentionally build in flexibility and optionality for the IESO to offer contracts to additional cost effective resources, beyond the targeted amount, in any given procurement window.</p>
<p>Deliverability</p>	<p>Feedback</p>
<p>Do you have any comments for the IESO to consider regarding deliverability under the new windowed approach?</p>	<p>SWEB Requests that the IESO provide clarity and further details on how they plan to handle the phases of deliverability testing required in between submission windows. Additionally, SWEB would like to understand how the IESO will handle deliverability testing if there is project attrition between submission windows?</p>

Ministry of Natural Resources Presentation:

<p>Renewable Energy on Crown Land Considerations</p>	<p>Feedback</p>
<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 IESO should provide clarity on if Crown Land Site Reports can be applied across multiple submission windows for the same project(s). If a project with a Crown Land Site Report is unsuccessful in an earlier submission window, can the report be resubmitted into a latter submission window for the same project?</p>
<p>Predevelopment Roadmap</p>	<p>Feedback</p>
<p>Do you have any comments regarding the information presented by MNR regarding the predevelopment roadmap?</p>	<p>No comments</p>

General Comments/Feedback

SWEB encourages the IESO to allow the addition and/or alteration of control group members of a project between Registration and Bid Submission. Forming partnerships with Indigenous Communities and obtaining all required legal documentation to be in compliance with the RFP takes time. As such, SWEB requests that the IESO recognize this effort and allow some leeway in this regard.

SWEB recommends that the IESO consider allowing bid submissions to have the option to connect to different circuits (i.e. a proposal indicating one or more points of interconnection within a given high-voltage transmission corridor), particularly where the proposed point of interconnection is to a circuit that runs parallel to one or more other circuits of the same voltage. SWEB recognizes that the IESO has allowed for the ability to propose up to two alternatives which could accommodate selection of other connection circuits. However, it is SWEB's understanding that the inclusion of proposal PQ alternates is to have flexibility in altering the size of a project and corresponding bid price. There is no material change to a project when changing the connection circuit between two or more circuits that run parallel to each other. The project and its alternatives should be allowed to have the ability to connect any circuit that has capacity if those circuits are in parallel. The ability for a project and its alternates to list different circuits it can connect to will benefit the IESO in achieving its procurement targets and give greater flexibility to proponents in proposing achievable projects.

SWEB also agrees with CanREA's comments which encourages the IESO to take a more proactive role to educate all municipalities throughout Ontario regarding upcoming competitive energy generation and capacity procurements. Based on SWEB's ongoing engagement with municipalities throughout the province of Ontario, it is apparent that some regions are conducting their operations under outdated procurement frameworks and would greatly benefit from additional education and capacity building with respect to the IESO's upcoming competitive procurements.