

# Feedback Form

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

### Feedback Provided by:

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Date: January 10, 2025

Following the LT2 RFP December 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 [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](mailto:engagement@ieso.ca) by January 10, 2024.**

## Overview of directive and LT2 updates

Question	Feedback
<ul style="list-style-type: none"> <li>Do you have any comments for the IESO regarding the proposed targets for the first submission window and/or the range of targets proposed for future windows?</li> </ul>	<p>We support the targets for the first procurement window for both the LTe and the LTc procurements.</p>
<ul style="list-style-type: none"> <li>Do you have any comments for the IESO to consider regarding the proposed timeline for the first submission window?</li> </ul>	<p>RFP (e) Document – Compass Greenfield Development strongly supports the as drafted timelines. The IESO has communicated these timelines for over a year, and we have been working diligently towards them. Further, we understand that the province has a significant need for new generation before the April 2030 Milestone Commercial Operation Date. The proposed windowed approach will allow projects not ready for the first window submission in July 2025 an opportunity to participate in subsequent windows.</p>

## LT2 (c) – High Level Overview of RFP and Contract

Question	Feedback
<ul style="list-style-type: none"> <li>Do you have any comments for the IESO regarding the newly proposed rated criteria related to duration?</li> </ul>	

## LT2(e) and LT2(c) RFPs and Contracts

Question	Feedback
<ul style="list-style-type: none"> <li>Do you have any comments related to the treatment of support confirmations across windows?</li> </ul>	<p>We support allowing for support confirmation to be used across multiple windows. This is consistent with council decisions for rezoning or other planning decisions made by a specific council at a specific time.</p>

Question	Feedback
<ul style="list-style-type: none"> <li>Do you have any comments related to the proposed new requirement for evidencing that a project is on Unincorporated Territory?</li> </ul>	
<ul style="list-style-type: none"> <li>Do you have any comments regarding the proposed early COD multiplier?</li> </ul>	<p>The LT2c RFP provides an advantage for non-electricity storage assets through its design by providing an Early COD Bonus Multiplier for Non-Electricity Storage only.</p> <p>We support an early payment multiplier for electricity storage projects for LT2c procurement to help level the playing field between non-electricity storage and electricity storage assets participating for the same MW.</p>

## Deliverability Guidance

Question	Feedback
<p>Do you have any comments around the Deliverability for Windowed Approach?</p>	
<p>Do you have any general comments you would like to share around the deliverability guidance or test methodology information presented for window 1?</p>	

## General Comments/Feedback

### **Comment 1: Increasing Competition by reducing the total Minimum Bid Security**

We welcome the reduction in Bid Security to \$35,000 / MW, however the increase in the minimum Bid Security from \$200,000 to \$500,000 means any project less than 14.3 MW would pay more than \$35,000 / MW. A 10 MW project would end up paying \$50,000 / MW in security or 42% more than larger projects which puts smaller projects at a disadvantage from a security cost basis, pulling down the internal rate of return or increasing the required PPA rate.

**We recommend that the IESO maintain the Minimum Bid Security at \$35,000 / MW but reduce the Minimum Bid Security to \$350,000.**

**Comment 2: Update to the DRAFT Prescribed Form: Evidence of Indigenous Community Participation (Energy) Required**

The IESO updated the definition of First Nations Community as shown below but has not yet updated the Prescribed Form: Evidence of Indigenous Community Participation to reflect part (b) of this updated definition in the November 6, 2024 version of this prescribed form.

First Nation Community

means, for the purposes of this LT2(e-1) RFP,

(a) a First Nation located in whole or in part in Ontario that is a “band” as defined in the *Indian Act*, RSC 1985, c I-5, as amended from time to time; or

(b) a Person, other than a natural Person, that has been determined by the Government of Ontario (for purposes of this LT2(e-1) RFP) to represent the collective interests of a community that is composed of First Nation natural Persons in Ontario.

**Excerpt from the November 6, 2024 version of this Prescribed Form**

**Section 2 – Proponent Indigenous Participation Level for Rated Criteria Points under Section 4.3(a) of the LT2(e) RFP**

a.	The Proponent is seeking to attain Rated Criteria Points under Section 4.3(a) of the LT2(e) RFP and the Proponent Indigenous Participation Level is equal to or more than 10%:	Yes, and the Proponent Indigenous Participation Level is comprised of Economic Interest in the Proponent that is held by (check all that apply): <input type="checkbox"/> a First Nation in Ontario that is a “band” as defined in the Indian Act, RSC 1985, c I-5; <input type="checkbox"/> a Métis Community; OR <input type="checkbox"/> an Indigenous Holding Vehicle.
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**We wanted to highlight that the IESO should update this Prescribed Form to include part (b) of the updated definition of First Nations Community.**

**Comment 3: Clarity Required for Municipal Support confirmation where a Lower Tier Municipality has not harmonized its Official Plan’s Land Use Designation with the Upper Tier Municipality.**

As discussed on a Webinar in November or December 2024, there may be instances where the lower tier or Local Municipality has not yet harmonized their Official Plan’s Land Use Designations with the Upper Tier Municipality. In these instances, it's possible that a project may be located outside of a Prime Agricultural Area as defined by the Upper Tier Municipality but in a Prime Agricultural Area as defined by the Lower Tier or Local Municipality.

We want to confirm that where this occurs, that the Local Municipality can reference the Upper Tier Municipality in Exhibit A – Form of Municipal Resolution in Support of a Proposal Submission, in particular in section 8 and 9 of the resolution, where the Local Municipality is specifying that a Municipal Project Lands does or does not include lands designated as Prime Agricultural Areas, see excerpt below.

8. The Municipal Project Lands <does/does not> include lands designated as Prime Agricultural Areas in the <insert name of Municipality>'s Official Plan.
9. Where the Municipal Project Lands does include lands designated as Prime Agricultural Areas in the <insert name of Municipality>'s Official Plan as of the date of this resolution:
  - a. The Municipal Project Lands are not designated as Specialty Crop Areas;
  - b. The Long-Term Energy Project is not a Non-Rooftop Solar Project;

**We would like to clarify that a lower tier i.e. Local Municipality can reference an Upper Tier Municipality in these sections of a Local Municipality resolution in support of a Proposal Submission.**