

Feedback Form

Long-Term 2 RFP – December 12, 2024

Feedback Provided by:

Name: David Thornton

Title: Director, Regulatory and Public Affairs

Organization: EDF Renewables Development Inc.

Email: [REDACTED]

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 by January 10, 2024.

Overview of directive and LT2 updates

Question	Feedback
<p>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?</p>	<p>For the LT2 Window 1 Energy target, EDFR submits that the IESO should consider procuring more energy than the 3 TWh currently proposed. IESO may exceed targets at its discretion where projects are considered cost-effective per IESO methodology.</p>
<p>Do you have any comments for the IESO to consider regarding the proposed timeline for the first submission window?</p>	<p>We recommend bid submission for LT2 W1 Energy target date to extend to Q4 2025 (November 28, 2025 aka last Friday in November) to allow time for: (1) MET Data collection; (2) Community and Municipality Support (i.e. MSRs) and; (3) Environmental studies (i.e. habitat and bat surveys) to take place during spring/summer and fall season. A November 28, 2025 date would help to ensure adequate time for meaningful engagement and partnerships with Indigenous communities and municipalities, generate a greater number of high-quality project proposals, and result in lowest-cost outcomes for ratepayers. Note that most municipalities take a summer recess during the months of July and August, providing limited time to secure municipal support before the end of June 2025. Should the IESO amend the LT2(e) window 1 proposal submission deadline to November 28, 2025, we believe that this will not impact our ability to meet the IESO's outlined commercial operation dates.</p>

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

Question	Feedback
<ul style="list-style-type: none"> Do you have any comments for the IESO regarding the newly proposed rated criteria related to duration? 	<p>It is recommended that the minimum duration for capacity resources be amended to four (4) consecutive hours and that rated criteria points be awarded to proposals that include duration capabilities of eight (8) consecutive hours or more.</p>

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

Question	Feedback
Do you have any comments related to the treatment of support confirmations across windows?	
Do you have any comments related to the proposed new requirement for evidencing that a project is on Unincorporated Territory?	
Do you have any comments regarding the proposed early COD multiplier?	

Deliverability Guidance

Question	Feedback
Do you have any comments around the Deliverability for Windowed Approach?	EDF is awaiting the updated connection guidance v3.0 as described on slide 50 as soon as possible.
Do you have any general comments you would like to share around the deliverability guidance or test methodology information presented for window 1?	Developers are not able to obtain accurate interconnection cost and schedule estimates. Lack of precision leads to developers increasing their contingency and therefore, overall, to higher bid prices.

General Comments/Feedback

LT2 Energy RFP Window 1 Finalization and Launch

We recommend that the IESO aim to finalize all RFP documents and launch LT2(e) window 1 by the end of February 2025. This would provide proponents, Indigenous communities, municipalities and other stakeholders with the final rules and documents required to proceed with development activities. Finalizing and issuing the LT2(e) w1 RFP by the end of February 2025 along with proposed submission deadline of November 28, 2025 would ensure adequate time for meaningful engagement and partnerships with Indigenous communities and municipalities, resulting in a greater number of high-quality project proposals and lowest-cost outcomes for ratepayers. Note that most municipalities take a summer recess during the months of July and August, providing limited time to secure municipal support before the end of June 2025.

Ministry of Natural Resources Related Policies and Processes

For Crownland applications, we request a timely clarification of the process for renewable energy projects. We have experienced long lead times for met tower installations on Crown Land under the *Renewable Energy Predevelopment Projects* process. We request that IESO review the process with MNR to improve timing on getting approval.

In addition, we request clarification of how many windows of LT2 Applicant of Record (AoR) status will be exclusive.