

# Feedback Form

## Long-Term 2 RFP – April 24, 2025

### Feedback Provided by:

Name: Chad Davis

Title: Business Development Analyst

Organization: Atura Power

Email: [REDACTED]

Date: May 9, 2025

To promote transparency, feedback submitted will be posted on the LT RFP engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
- ☒ **No – comfortable to publish to the IESO web page**

Following the LT2 RFP April 24, 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 LT2 [engagement web page](#).

**Note:** The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by May 9, 2025.**

## Tariff Risk Mitigation

Do you have any comments related to the tariff risk mitigation concepts presented during the webinar?

- Has the IESO considered mechanisms that would provide relief if future federal or provincial tariff regimes that introduce cost impacts that occur after long lead time equipment has been ordered? The proposed tariff relief mechanisms represent a fair risk sharing arrangement between the proponents and the IESO for tariffs that occur between the bid proposal date and the order date for long lead time equipment, however proponents are still subject to risk from tariffs that occur after equipment has been ordered. For example, a large transformer ordered from overseas may be subject to a new import duty upon arrival in Canada, even if it was ordered months earlier under a different tariff regime. The IESO should consider a mechanism for proponents to recover costs due to unforeseen tariff impacts to projects.

## LT2 RFP and Contract Updates

Do you have any comments related to the other RFP and Contract updates presented during the webinar?

No.

## LT2 RFP Requirements for Crown Land Projects

Do you have any comments regarding the new Proposal Submission requirements for Crown Land Projects?

- The use of an MNRF-endorsed Crown Land Site Report is a good filter. However, in practice, getting this endorsement ahead of proposal deadlines adds risk. Would the IESO consider introducing a voluntary early validation round with MNRF to check shapefile and project boundary alignment? This could help avoid late-stage surprises or rejection over formatting issues that don't reflect substantive land use conflict. Proposals for Crown Land projects require a letter from MNRF confirming endorsement of a submitted Crown Land Site Report. That's a gating document, an early validation round could flag issues early—like overlapping claims, protected areas, or timing conflicts—so proponents don't get blindsided close to the October 16 submission deadline.

## LT2 RFP Deliverability Update

Do you have any comments regarding the deliverability guidance updates presented during the webinar?

- For projects with PQ Alternates, it is unclear how the final selected capacity will be disclosed or how close proposals may rank before one becomes undeliverable. More transparency on tie-breaks and prioritization would be welcome.
- Can the IESO clarify the treatment of projects on the edge of deliverability limits, if a zonal limit is 600 MW and three 250 MW projects apply, how does IESO choose?

- Given the range of factors tested (IBR-specific limits, fault levels, SSR, etc.), will proponents receive a summary of the specific constraint that caused a “Not Deliverable” outcome?

## General Comments/Feedback

### Agricultural Impact Assessment (AIA)

- The IESO should work with Ontario Ministry of Food, Agriculture, and Rural Affairs (OMAFRA) to ensure that the AIA requirements are published as soon as possible such that proponents can understand the pre-bid requirements specifically.

### GHG Abatement Plan

- In respect of S 2.14 (c) in the LT2(c) Contract, recommend including a provision where the Buyer’s determination in the CES MAE Confirmation “may not be unreasonably withheld or conditioned”. On the basis that the Supplier is undertaking Commercially Reasonable efforts to develop a GHG Abatement Plan and complying with additional information requests as may arise, Buyer should have an obligation to reasonably review and accept the CES MAE Notice.

### Proponent Project Registration

- In accordance with 3.4(d), the IESO will respond to the proponent’s registration with the Unique Project ID in advance of the Proposal Submission, can the IESO commit to a turnaround time to provide the Unique Project ID after registrations are submitted?
- Has the IESO considered combining the Proposal and Registration fees?