

Feedback Form

Long-Term 2 RFP – May 21, 2025

Feedback Provided by:

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Date: May 29, 2025

To promote transparency, feedback submitted will be posted on the LT2 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 May 21, 2025, 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 by May 29, 2025.

Post-Proposal Applicable Tariffs

Do you have any comments related to the approach to mitigating the risk of Post-Proposal Applicable Tariffs presented during the webinar?

RES welcomes and appreciates the IESO's approach on providing multiple tariff-related mitigation measures in the Contract. We broadly support the Tariff Adjustment Notices (TANs) mechanism currently proposed. However, we would like to suggest the following changes to increase the effectiveness of this approach,

- a. remove any total capital cost increase thresholds for Tariff Adjustment Events
- b. remove any timing-related restrictions on the submission of TANs
- c. allow Suppliers to submit unlimited TANs
- d. any rejections under the Buyer TAE Price Notices do not automatically trigger contract termination and Suppliers are the opportunity to resubmit a revised Proposed TAE Price Notice for the same Tariff Adjustment Event
- e. since the Post-Proposal Applicable Tariff impacts are beyond the Supplier's control, remove the requirement for the Supplier to provide any Completion and Performance Security as liquidated damages in the event of rejection under any Buyer TAE Price Notices
- f. revise language relating to the Buyer's evaluation of any Proposed TAE Price Notices from the "*sole and absolute discretion*" to the standard of "*acting reasonably*"

Gas Turbine Delivery Delay Provisions

Do you have any comments related to the approach to handling potential delays in the delivery of gas turbines presented during the webinar?

RES believes the IESO's provision of allowable delays for gas turbines continues to undermine the intended technology-agnostic nature of the LT2(c) procurement and increases the risk of resource inadequacy. If IESO's intention is to launch a technology-agnostic tender, it should provide an equal playing field for all technologies. Conversely, if IESO intends to favour particular technologies, whether through longer allowable lead times, longer capacity requirements, removal of early COD rewards, it should instead move towards technology specific competitive tenders to enhance the competitiveness aspects of the bid.

Crown Land Site Report and MNR Confirmation Letter

Do you have any comments related to the CLSR and MNR Confirmation Letter requirements presented during the webinar?

LT2 RFP Deliverability Update

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

Can the IESO clarify if it plans to update the LT2(c) Preliminary Connection Guidance & Evaluation State Deliverability Test Methodology document in advance of the Bid Window 1 submission deadline?

General Comments/Feedback

Risk of change in ITC regulations

RES notes the continued absence of a mechanism to compensate developers for any potential repeal of the Federal Investment Tax Credit (ITC) and other governmental sources of funding in the future.