Feedback Form

Long-Term RFP – June 9, 2022

Feedback Provided by:

Name: Stephen J. Sangiuliano

Title: Vice-President, Project Development

Organization: Bedrock Energy Corp.

Email:

Date: June 20th, 2022

Following the June 9th public webinar on the Long-Term RFP, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the additional procurement mechanisms, as well as on proposed revenue streams.

The referenced presentation can be found on the Long-Term RFP webpage.

Please provide feedback by June 20, 2022 to engagement@ieso.ca.

Please use subject header: *Long-Term RFP*. To promote transparency, this feedback will be posted on the <u>Long-Term RFP webpage</u> unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.



Additional Mechanisms: Overview and Linkages

Topic	Feedback
Please provide any feedback on the IESO's overview of the Additional Mechanisms (Expedited Process, Same-Technology Expansions, FCA) and the linkages between acquisition mechanism (e.g., Expedited Process and LT1 RFP, or LT1 RFP and LT2 RFP)	

LT1 RFP and Expedited Process: Mandatory Requirements and Rated Criteria

Topic	Feedback

Please provide any feedback on the Mandatory Requirements and Rated Criteria proposed for the LT1 RFP and Expedited Process.

Indigenous Community Participation:

Bedrock Energy Corp. ("Bedrock") is 100% behind indigenous participation. The financial community and negotiations with Indigenous communities will realistically look at a variety of characteristics in creating the financial architecture for a suitable debt-equity structure. It may not be possible for one party (indigenous community or otherwise) to achieve a 50% ownership slice in a consortium, specifically in a utility-scale project in the several hundreds of MWs. This can be discouraging for either of the parties. Therefore, Bedrock believes that the scale of the project should be taken into consideration by the IESO.

Location:

Bedrock believes that, while the IESO zonal map is helpful, the geographical boundaries proposed by the IESO are overly simplistic and do not necessarily coincide with the with the coordinates associated with the flow of electricity. Bedrock would like the IESO to clarify how the location of a project will be treated with consideration to the above.

Duration of Service:

Bedrock supports the IESOs currently proposed Rating Criteria with respect to duration of service, with projects that can provide greater duration of service being awarded accordingly given the benefits that will be realized therefrom on the electrical grid.

LT1 RFP and Expedited Process: Proposed Contract Design

Торіс	Feedback
Please provide feedback on the proposed contract design for the LT1 RFP and Expedited Process. The IESO welcomes feedback on the proposed approach for qualifying capacity as well as the proposed Capacity Payment Adjustment Mechanism.	

LT1 RFP and Expedited Process: Proposed Term Lengths

Topic	Feedback
Please provide any feedback on the term length considerations proposed in addition to the incentive mechanism for the Expedited Process.	Bedrock appreciates that the IESO has considered increasing term length to 20 years, however, Bedrock believes that the more ideal term length should better coincide with the useful life of the facility in order to amortize the capital costs over a longer period of time, reduce the need for arbitrary assumptions about the value of the facility at the end of the term of the agreement, and thereby reduce electricity costs for the ratepayer, which ought to be a paramount public priority.

Deliverability Assessment

Topic	Feedback
Please provide feedback on the IESO's proposed process for deliverability testing and timelines.	

Additional Acquisition Mechanisms: Same Technology Expansions

Topic	Feedback
Are the descriptions of the different kinds of upgrades/expansions clear and reflective of the options?	

Торіс	Feedback
What are the interdependencies between the existing contract, any upgrades and on- site expansions that need to be considered?	
Are any interdependencies missing/not fully captured?	
What are the considerations for participating in the Expedited Process or LT1 RFP?	
What other key considerations/risks need to be included to help ensure this initiative is successful?	
Additional Acquisition Mechanisms:	Forward Capacity Auction
Is expanding eligibility to variable generation, self-scheduling and co-located hybrid facilities in the FCA and ACA a priority for stakeholders?	
(Refer to slide 99)	
Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect the design differences?	
(Refer to slide 106)	
Any feedback on potential features that could be considered for the design of the FCA?	
(Refer to slide 108)	

Торіс	Feedback
Is expanding eligibility to variable generation, self-scheduling and co-located hybrid facilities in the FCA and ACA a priority for stakeholders?	
Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect FCA design differences?	
What other design features should be considered to increase the attractiveness of a Forward Capacity Auction as part of IESO's suite of acquisition mechanisms? (Refer to slide 110)	

General Comments/Feedback