

Feedback Form

Long-Term RFP – June 9, 2022

Feedback Provided by:

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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 [Long-Term RFP webpage](#) 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

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

Development Entity Qualifications: We have reviewed these criteria and we feel they are too restrictive. The Ottawa Renewable Energy Cooperative has designed, permitted, financed, built, owned and operated numerous solar projects of less than 500KW, and this an upper size threshold imposed by FIT compliance rules. We have in total 21 active projects with approximately 6 MW of generation deployed (3.4MW directly owned), including both wind and solar capacity. Our most recent project was commissioned in 2021 but the bulk of our projects were commissioned more than 5 years ago. Under the current criteria, this experience does not qualify because it is too small and too old. To us this is a fairness issue, since Ontario has not had many opportunities for small generators such as OREC to undertake other projects since the FIT contracts ended about 6 years ago. Small generators such as OREC can and normally do achieve much in the way of energy project development by means of hiring contractors, engineers and project managers who are not part of our executive teams, or by partnering with developers who undertake the bulk of project fulfillment responsibilities. We feel that the 500KW limit is too restrictive as it filters out most of our projects arbitrarily. We further suggest that the qualification criteria should be relaxed to allow small generators such as OREC to submit as qualified proponents, notwithstanding that they previously have had less executive responsibilities in the fulfillment of their prior projects and notwithstanding that they would hire third parties in the various fulfillment roles, including financing, permitting and construction.

Furthermore, local ownership and control of energy projects, where profits, jobs and electricity is (and is seen to be) kept local has been proven to be an excellent way to engender community support behind new energy projects. the world is littered with situations where a remote government, with out-of-town

Topic	Feedback
	<p>companies, has met fierce local opposition to necessary projects that would benefit the community (but is seen as an outside intrusion). If the IESO wishes to gain localized support, across the province, for this program; there should be points or benefits awarded to project proponents, who include local ownership as part of their proposal (not just community 'engagement programs'. These local ownership participants can be Cooperatives that are 100% owned by citizens of Ontario, and other social enterprises that are transparent in their ownership structure. (and possibly local electricity companies.....??)</p>

LT1 RFP and Expedited Process: Proposed Contract Design

Topic	Feedback
<p>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.</p>	

LT1 RFP and Expedited Process: Proposed Term Lengths

Topic	Feedback
<p>Please provide any feedback on the term length considerations proposed in addition to the incentive mechanism for the Expedited Process.</p>	

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?	
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

Topic	Feedback
<p>Is expanding eligibility to variable generation, self-scheduling and co-located hybrid facilities in the FCA and ACA a priority for stakeholders?</p> <p>(Refer to slide 99)</p>	

Topic	Feedback
<p>Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect the design differences?</p> <p>(Refer to slide 106)</p>	
<p>Any feedback on potential features that could be considered for the design of the FCA?</p> <p>(Refer to slide 108)</p>	
<p>Is expanding eligibility to variable generation, self-scheduling and co-located hybrid facilities in the FCA and ACA a priority for stakeholders?</p>	
<p>Any feedback and suggestions on how the performance assessment framework may need to be modified to reflect FCA design differences?</p>	
<p>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?</p> <p>(Refer to slide 110)</p>	

General Comments/Feedback