

Feedback Form

Long-Term RFP – July 21, 2022

Feedback Provided by:

Name: Margaret Koontz

Title: Manager Market Affairs

Organization: Atura Power

Email: [Click or tap here to enter text.](#)

Date: August 4, 2022

Following the July 21st public webinar on the Long-Term RFP, the Independent Electricity System Operator (IESO) is seeking feedback from participants on: Municipal Council Support Resolution, Contract Design, Revised Timelines, and the Deliverability Test Guidance Document.

The referenced presentation can be found on the [Long-Term RFP webpage](#).

Please provide feedback by August 4, 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.

Municipal Council Support Resolution

Topic	Feedback
Please provide any feedback on the IESO's proposal to change the Municipal Council Support Resolution from a mandatory requirement to a rated criteria.	Atura Power is supportive of this change

Proposed Contract Design

Topic	Feedback
Please provide any feedback on the potential use of indexing in the contracts and what indices (if any) may be best suited for these procurements.	<p>Atura Power is supportive of having a mechanism to:</p> <p>(a) adjust the contract price based on equipment/labour cost escalation beyond a certain threshold</p> <p>We are finding that the battery energy storage providers are basing their pricing on the index for Lithium Carbonate and exchange rate for USD/RMB due to the uncertainty of pricing of this raw material.</p> <p>For some equipment providers, the final equipment pricing would be adjusted up or down two quarters before delivery based on a formula linked to the LiCarbonate/RMB.</p> <p>Index for Lithium Carbonate: (CNY/T):https://tradingeconomics.com/commodity/lithium</p> <p>(b) escalate the contract price on an annual basis to follow general escalation</p> <p>Annual services fees are expected to be based on a standard escalator of 2-3% per annum but may also have provisions that link the escalator to the Producer Price Index - Final Demand, Finished Goods (WPUFD4) if it is greater.</p> <p>Augmentation of Battery systems is required over the twenty years which again will be affected by the price of the raw materials. A mechanism to account for this beyond a certain threshold (up/down) will reduce this uncertainty.</p> <p>Further stakeholder engagement will be required to identify the appropriate mechanisms for escalation adjustments.</p>

LT1 RFP and Expedited Process: Revised Timelines

Topic	Feedback
<p>Please provide feedback on the proposed revised timelines and whether these seem appropriate.</p>	<p>The extension of the timeframe for the deliverability test is a challenge for proponents and associated stakeholders because it increases the amount of time proponents and stakeholders will spend to advance a potential project before knowing if it is feasible.</p> <p>In the case of the LT1, proponents will have been working to advance projects for at least 8 months before receiving an indication as to whether their project is deliverable or not.</p>

Deliverability Test Guidance Document

Topic	Feedback
<p>Please provide any feedback on the Deliverability Test Guidance Document and associated form.</p>	<p>Can the IESO provide a form that does not use macros as macros have been disabled by our enterprise administrator for security reasons.</p> <p>Given the extension of the timeframe for the deliverability test, it would be helpful if IESO could provide advance high level circuit availability information (as was done in previous IESO/OPA procurements) to help proponents gauge appropriate project sizes and locations before investing substantial resources in moving potential projects along.</p> <p>It would also be helpful if the deliverability test could provide more insight into appropriate project sizes rather than just pass/fail. For instance, if a project 'fails', at the proposed size, but a smaller size would have 'passed', ideally the deliverability test could provide this information instead of forcing proponents to attempt discovery of these limits by using the three allowed test configurations to guess what might be feasible.</p> <p>Furthermore, the IESO should release more detailed information to explain the assumptions and process for conducting the deliverability test.</p> <p>Lastly, can the IESO provide details of which future expansions of transmission lines or generation (i.e. SMRs) that will be included in the deliverability test assumptions?</p>

General Comments/Feedback