

Feedback Form

Long-Term RFP – July 21, 2022

Feedback Provided by:

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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.	Northland Power is generally supportive of any changes that provide developers with more time to meaningfully engage with impacted communities.

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.	Northland Power supports indexing provisions as a means to provide developers with a hedge against inflation and commodity price hikes. Indexing revenues to account for changes in commodity costs (from contract award through COD), and inflation (through the life of the contract), helps address risks that would otherwise manifest in higher risk premiums and financing costs.

LT1 RFP and Expedited Process: Revised Timelines

Topic	Feedback
Please provide feedback on the proposed revised timelines and whether these seem appropriate.	Given the delay in the procurement timeline, does the IESO anticipate delaying the in-service date requirement for any of its procurements?

Deliverability Test Guidance Document

Topic	Feedback
Please provide any feedback on the Deliverability Test Guidance Document and associated form.	<p data-bbox="776 163 1505 279">Northland Power supports the proposed prioritization of procurements for the purposes of the Deliverability Assessment.</p> <p data-bbox="776 321 1505 636">The IESO should revisit its Deliverability Assessment assumption that wind and solar are generating at 100% capacity during periods of peak demand. Continuing to do so will result in projects being deemed “Undeliverable” or “Deliverable but Competing” when in fact they are “Deliverable”. Similarly, the IESO should revisit its assumption that wind generation is at 0% capacity when storage is charging.</p>

General Comments/Feedback

Northland Power supports the development of a stand-alone storage specific commercial structure, in conjunction with a minimum stand-alone storage procurement target.

Furthermore, proponents of stand-alone storage projects should be permitted to participate in the RFP under either the stand-alone storage commercial structure, or the more straightforward capacity-style commercial structure. Some proponents may prefer the hedge provided by a resource-specific commercial structure, while other may prefer the certainty and simplicity of a capacity-style commercial structure. Providing both options will suit the needs of more proponents and encourage competition.