

Feedback Form

Long-Term RFP – July 21, 2022

Feedback Provided by:

Name: Sarah Rosenblat

Title: Development Manager

Organization: SWEB Development

Email:

Date: August 3, 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
<p>Please provide any feedback on the IESO’s proposal to change the Municipal Council Support Resolution from a mandatory requirement to a rated criteria.</p>	<p>SWEB supports the IESO’s proposal to change the Municipal Council Support Resolution (MCSR) from a mandatory requirement to a rated criteria. SWEB would also advise the IESO to make the point demarcation minimal between projects which have a MCSR and those which do not. This is because the issuance of a MCSR is often out of developers’ control and is subject to municipal permitting processes which can be fairly stringent and prescribed. SWEB would recommend that the IESO also consider a mid-level rating which shows that the project developer has begun work towards the issuance of a MCSR with the municipality, but simply does not have it issued yet.</p>

Proposed Contract Design

Topic	Feedback
<p>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>	<p>SWEB applauds the IESO for their forward-thinking approach to the contract design proposed for the LT1 RFP. SWEB believes that the key commodity which should be indexed is lithium ion. While the IESO may choose to index other equipment or materials, SWEB encourages lithium ion to be closely followed as this material’s pricing is quite volatile and is commonly used in battery and energy storage solutions.</p> <p>SWEB encourages the IESO to follow two main contract streams – one for non-storage resources, and one for storage and/or hybrid-storage resources. However, SWEB urges the IESO to ensure that the contract design does not unfairly favour non-renewable or standalone storage resources.</p> <p>SWEB also encourages the IESO to revisit a more resource-specific commercial structure for contract design. These resource specific structures could be potential sub-structures within the two core “non-storage” and “storage and/or hybrid-storage” contract streams.</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>SWEB understands that the IESO has received more than 70 applications for the RFQ and requires additional time to review and evaluate. However, considering the over 900 potential projects identified in the RFQ process, SWEB recommends adding additional time to the Deliverability Test Results timeline.</p> <p>Based on the timeline proposed, the IESO assumes that it can complete all Deliverability Test analyses in approximately 50 business days. SWEB believes that there are additional projects that developers plan to bid into the RFP. As such, SWEB urges the IESO to set realistic workload assumptions as to how many projects can be analyzed per day.</p> <p>Following the above, should the Deliverability Test Results timeline be postponed, then the date for RFP Proposal Submission should also be postponed. Developers will need time to adapt their projects should they receive a “Deliverable but Competing” result from the Test. However, Potential delays to the submission date are harder to adapt to later on in the development and preparation process. This is why accurate Deliverability Test timelines are so vital.</p>

Deliverability Test Guidance Document

Topic	Feedback
<p>Please provide any feedback on the Deliverability Test Guidance Document and associated form.</p>	<p>SWEB requests that the IESO provide more clarity on the potential cap on the number of projects that each applicant can submit for the Deliverability Test.</p> <p>SWEB would also like to confirm if it is the IESO’s intent that only projects which go through the Deliverability Test analysis are eligible to submit a proposal into the LT1 RFQ. SWEB urges the IESO to make this potential project eligibility criteria well known if that is the case.</p>

General Comments/Feedback