

Feedback Form

Long-Term RFP – March 28, 2023

Feedback Provided by:

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Date: April 11, 2023

Following the March 28th public webinar on the Long-Term RFP (LT1 RFP), the Independent Electricity System Operator (IESO) is seeking feedback from participants on design of the LT1 RFP and LT1 Contract.

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

Please provide feedback by April 11, 2023 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.

LT1 RFP Design and Lessons Learned from E-LT1 RFP

Topic	Feedback
<p>E-LT1 RFP: Please provide any general feedback reflecting on your participation in the E-LT1 RFP as it relates to the upcoming LT1 RFP.</p>	<p>Evolution by Brookfield Renewable generally supports maintaining similar or identical terms—both in the contract design and the RFP process—that were established in the E-LT1 RFP for the upcoming LT1 RFP. Maintaining similar or identical terms would save proponents time and resources from revising project characteristics, as well as from re-negotiating supplier, land-use, and municipal agreements. More importantly, proponents would avoid having to re-seek internal approvals that can be lengthy. Such certainty and consistency would encourage proponents to re-offer projects, develop new ones, and would ultimately increase the number of offered projects for the IESO.</p> <p>In the same vein, we agree that the qualified participants' list should not be expanded: the IESO should prioritize shovel-ready projects from experienced proponents that have been engaging the IESO and other regulators early in the process.</p>

Topic	Feedback
<p>LT1 RFP design: Please provide any feedback on the proposed Mandatory Requirement for Municipal Support.</p>	<p>We agree that Municipal Support is a critical part of any successful project, and we support its mandatory requirement. However, Evolgen is concerned with the mandatory requirement to obtain Municipal Support Resolution significantly ahead of bid submission and Deliverability Testing being completed.</p> <p>The outcome of the IESO-managed Deliverability Testing could change a project’s final configuration—including location, size, and mitigation measures such as soundproofing walls—all factors that can retroactively void or affect a Municipal Support Resolution. The proposed requirement to obtain Municipal Support prior to Deliverability Testing, or not being given enough time to revise the Resolution prior to bid submission, could therefore introduce an unnecessary project risk and cause delays or cancellations.</p> <p>What’s more, the requirement to obtain strict Municipal Support too early in the RFP process could result in Municipalities being inundated with requests to evaluate a multitude of tentative and competing projects. In this scenario, Municipalities would be tasked with ranking and analyzing tentative projects—most of which would not be built due to interconnection constraints and/or projects not clearing the RFP.</p> <p>We urge the IESO to work with Municipalities and proponents to create a more effective Municipal Support requirement process.</p>

Topic	Feedback
<p>LT1 RFP design: Please provide any feedback on the Rated Criteria Categories and Point Allocation.</p>	<p>As stated, we prefer similar or identical terms that were established in the E-LT1 RFP for the upcoming LT1 RFP. In the event where changes occur, we ask that the IESO communicate such changes as early as possible so that proponents can prepare and modify their projects accordingly.</p> <p>In particular, we strongly urge the IESO to consult and release information related to transmission interconnection capabilities and guidelines with Hydro One as soon as possible. To ensure that the IESO can successfully procure 1600MW of storage projects—a significant volume—more <u>flexibility</u> and clarity in interconnection options and Deliverability Testing criteria is recommended.</p>

Indigenous Community Participation

Topic	Feedback
<p>Please provide any feedback on the Rated Criteria for Indigenous Community Participation as contemplated in the E-LT1 RFP as it relates to the upcoming LT1 RFP.</p>	<p>We support the IESO’s intention to consult with Indigenous Communities and their participation being included as a Rated Criteria.</p> <p>We note that local communities’ <u>participation</u> in a project, be it with First Nation partners or Municipalities, should be rated with flexibility and not become a strict requirement. For example, projects could be positively rated on local communities’ participation: with a First Nation community, a Municipality, or both; but there should not be a Rated Criteria that establishes a specific kind of participation as more advantageous than the other. Proponents should choose an appropriate local partner(s), if any, and be rated for it, depending on unique project locations and what type of partner is available and open for collaboration.</p> <p>As the LT1 RFP will award 20-year contracts—a significant commitment and responsibility for proponents and their partners both—the IESO should not incentivize rushed decisions to enter into poorly-fitted partnerships simply to maximize Rated Criteria points.</p>

Proposed Contract Design: General Feedback

Topic	Feedback
<p>Please provide feedback on any contract provisions you wish to comment on.</p> <p><i>Note: the commercial structure/ revenue model for the LT1 Contract will not be modified from that which was used under the E-LT1 Contract.</i></p>	<p>As mentioned, Evolugen generally supports maintaining the E-LT1 RFP’s models and contract design. However, we strongly urge the IESO to establish guidelines, hold workshops, and consult on how the recently confirmed Federal Investment Tax Credits and CIB funding would be treated in the LT1 RFP.</p> <p>Finally, providing more flexibility with COD expectations (after May 2027) will allow proponents to mitigate project and supplier risks, and will in turn result in lower costs to rate payers.</p>

General Comments/Feedback