Feedback Form

Long-Term RFP – May 4, 2023

Feedback Provided by:

Name: Matthew Allen Title: Project Developer Organization: BluEarth Renewables

Email:

Date: May 18, 2023

Following the May 4th 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 May 18, 2023 to engagement@ieso.ca.

Please use subject header: *Long-Term RFP*. To promote transparency, this feedback will be posted on the <u>Long-Term RFP webpage</u> 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.



Торіс	Feedback
The revised proposed procurement timeline presented on May 4, with regards to changes to the schedule of the Deliverability Test process.	We are support accelerating the start of the deliverability test submission in June to provide at least 2 months between deliverability test results and LT1 proposal submissions. This would allow three weeks to refine form, if required, and obtain accurate interconnection information to reduce clarifications by the IESO.
	We recommend the connection provider (i.e., Hydro One or the LDCs) provide supplemental guidance on the proposed connection configurations (i.e. specify three-breaker switching station, or T-taps, recommendation location of the switching station, land requirements of the switching station, available tele protection schemes available at the switching station (dark fiber, Bell fiber, LTE/5G, satellite) to facilitate developers estimating efforts for the interconnection costs more appropriately. It would be also prudent to provide pre-consultations availability with the interconnection transmission providers, like Hydro One, to respond to developer questions surrounding interconnection details post deliverability results and pre-November bid submission.
The proposed broadened definition of an Eligible Expansion facility, which gives the optionality of connecting to a separate connection point as long as the new resource remains within the boundaries of the existing site.	
The removal of locational Rated Criteria points due to a provincial wide Capacity need within the timeframe of the LT1 RFP.	We support removing the locational consideration in the rating criteria.

Areas of Feedback:

Other or General Comments/Feedback:

Contract award timing: We recommend a contract award no later than May 1, 2024 to facilitate the start of environmental field studies ahead of the seasonality data collection period. If contract award notification slips into June, 2024 it may take until June 2025 or longer to complete field

studies, thus delaying information for Municipalities requests such as a support resolution, zoning bylaw amendment and/or site plan approval.

COD: The target commercial operation date continues to reflect an expedited process by the IESO, with industry responsible for progressing development prior to project award to meet the RFP requirements and anticipated project timelines. Below are a few considerations from the industry perspective:

<u>Interconnection</u>: An expedited interconnection process is anticipated given the draft timeline from contract award to commercial operation being approximately three years at the latest. The posted online process takes between 36-58 months (3-5 years); therefore, it would be prudent for IESO and HONI to provide adequate assurances that the connection process will be expedited.

<u>Early COD Incentive</u>: We would support an early COD concept multiplier similar to ELT1 for the LT1 procurement.

Community Engagement: We do not recommend requiring Proponents to have received a municipal support resolution in advance of proposal submission due to the burden on the municipalities and stakeholders. We recommend reverting to the E-LT1 RFP structure where Proponents are required to have received a municipal support resolution within 18 months of Contract execution.

MCIA: We believe any revision to the MCIA should include a foreign exchange component at a material allocation percentage (>30%).

Proposal Limits & Group Award Limits: We are supportive of the E-LT1 RFP maximum project submission threshold and maximum proposal capacity threshold. These limitations would limit the burden on the IESO from an evaluation and selection perspective.

CIB & ITC: With both CIB and ITC, we recommend establishing sufficient clarity well in advance of the Proposal submission to limit uncertainties and potential delays in the Proposal Submission date.