

Feedback Form

Long-Term RFP – May 4, 2023

Feedback Provided by:

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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 [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.

Areas of Feedback:

Topic	Feedback
<p>The revised proposed procurement timeline presented on May 4, with regards to changes to the schedule of the Deliverability Test process.</p>	<p>Capstone believes the revised procurement timelines may present challenges for some proponents in securing and submitting sites for the Deliverability Test.</p>
<p>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.</p>	<p>Capstone is supportive of changes to the LT1 RFP that enable hybrid expansions to existing renewable generators that enable the buildout of energy storage. We ask the IESO to please consider the following:</p> <ol style="list-style-type: none"> 1. Clarify the definitions of Co-located, Integrated or other hybrids under the Eligible Expansions definition in the RFP and Deliverability Test. 2. Confirm which RFP category Eligible Expansion facilities that include energy storage will be classified under (Storage or Non-Storage?) 3. With respect to LT1 eligibility and the Deliverability Test, can the IESO please confirm how the following scenarios would be assessed in relation to adding a 100MW BESS to a 100MW existing renewable generator? <ul style="list-style-type: none"> <i>A) Co-Located 100MW BESS Expansion to an existing 100MW renewable generator, maintaining 100MW Connection Point. Our belief is this will NOT PASS the Deliverability Test.</i> <i>B) Co-Located 100MW BESS Expansion to an existing 100MW renewable generator, expanding Connection point to 200MW. Our belief is this MAY PASS the Deliverability Test.</i> <i>C) Integrated 100MW BESS Expansion to an existing 100MW renewable generator, maintaining 100MW Connection Point. Our belief is this will NOT PASS the Deliverability Test.</i>

Topic	Feedback
The removal of locational Rated Criteria points due to a provincial wide Capacity need within the timeframe of the LT1 RFP.	Capstone believes the removal of locational Rated Criteria points is acceptable.

Other or General Comments/Feedback:

Overall, it is advisable to release the full LT1 RFP and contract as soon as possible.

Capstone has previously provided comments on various challenges facing hybrid expansions at existing facilities through the E-LT1 process (i.e., questions related to RFP eligibility and deliverability, hybrid-specific contract requirements, market participation uncertainty, licensing/permitting uncertainty, etc.) as well as through the Annual Acquisition Report (AAR) and Hybrid Integration Project (HIP).

- Annual Acquisition Report Submission reference: <https://ieso.ca/-/media/Files/IESO/Document-Library/engage/aar/2023-aar-20230309-capstone-infrastructure.ashx>
- Hybrid Integration Project Submission reference: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/hip/hip-20230216-capstone-infrastructure.ashx>