



July 13, 2023

Dear IESO Engagement Team,

EDP Renewables North America (EDPR) welcomes this opportunity to provide feedback to the IESO regarding the Long Term 1 RFP and appreciates your ongoing willingness to receive input from developers and other stakeholders as this procurement moves forward.

Market Rule Protections

Though the IESO recently indicated the market rule protection is now considered finalized, we would encourage the IESO to reopen those discussions with developers, like EDPR, in addition to other stakeholders. As the entity responsible for implementing the proposed market overhaul, the IESO should do more within its power to ensure that suppliers are adequately protected against unpredictable economic impacts to market rule changes.

Deliverability

As a developer looking to bid into this procurement, we again encourage the IESO to provide further transmission availability information which is crucial when determining the most opportune locations for project development. We understand there are conflicting views as to how useful that information would be to developers and how it would be applied. However, we must stress that more transparency is beneficial, and would enable developers to design projects more effectively which would have a higher likelihood of reaching operation. To reduce confusion among stakeholders, we encourage the IESO to provide as much information and insight it can about system capacity, deliverability, and connection needs as early in the procurement process as possible.

Cost Adjustments

The IESO continues to advise proponents against applying for System Impact Assessments and Cost Impact Assessments prior to bid submissions. Due to limited available information on system requirements, proponents are left to estimate connection costs within their bids, risking project failure or prices that are too high and could have been avoided with more information. The IESO should incorporate a mechanism to adjust contract pricing based on connection costs that exceed commercially reasonable expectations.

Investment Tax Credit

Lastly, we are seeking clarification in the contract language that Additional Sources of Government Support will exclude funding from the ITC, which was made explicitly clear in the E-LT1 contract.

Again, we appreciate the opportunity to provide feedback to the IESO and look forward to discussing these recommendations. We believe IESO can reduce some of the unnecessary risk being carried by developers and ensure that a successful competitive procurement will undoubtedly lead to those winning project being built.

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Sincerely,

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About EDP Renewables North America

EDP Renewables North America LLC (EDPR), its affiliates, and its subsidiaries develop, construct, own, and operate wind farms and solar parks throughout North America. With 58 wind farms, nine solar parks, and eight regional offices across North America, EDPR has developed more than 8,800 megawatts (MW) and operates more than 8,200 MW of onshore utility-scale renewable energy projects. In Ontario, EDPR owns and operates two wind farms: the 100 MW Nation Rise Wind Farm in North Stormont, and the 30 MW South Branch Wind Farm in South Dundas. We are also developing several other projects in the province.

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