

Feedback and IESO Response – V2

October 2024

Transmitter Selection Framework

Following the Transmitter Selection Framework Public and Focused Engagement Session webinars, the IESO invited Indigenous communities, municipalities, and stakeholders to provide comments and feedback on the materials presented at each session.

The IESO received written feedback submissions from:

- Aamjiwnaang First Nation
- Brunswick House First Nation
- Grid United
- Saugeen Ojibway Nation
- Taykwa Tagamou Nation
- Thessalon First Nation
- Evolgen by Brookfield Renewable
- Hydro One
- Invenergy
- NextEra Energy Transmission, LLC.
- Ontario Power Generation
- Transmission Infrastructure Partners
- Lac Seul First Nation
- Michipicoten First Nation
- Missanabie Cree First Nation
- NextEra Energy Transmission, LLC.
- Ontario Native Welfare Administrators Association
- Minogi Corp. (A Mississaugas of Scugog Island First Nation Company)

- Mohawks of the Bay of Quinte
- Northwind Business Development/Caldwell First Nation
- Oneida Nation of the Thames
- Territorial Planning Unit of Grand Council Treaty #3
- Three Fires Group
- Grid Reliability Consulting, LLC
- Canadian Renewable Energy Association

The presentation materials and stakeholder and Indigenous community feedback submissions have been posted on the IESO [engagement webpage](#) for these engagement sessions. Please reference the material for specific feedback as the below information provides excerpts and/or summaries only.

Engagement Launch – November 22, 2023

Summary of Feedback	IESO Responses
<p>Engagement Launch Topics:</p> <p>Engagement Plan Feedback</p> <p>Stakeholders and communities generally support the engagement plan and emphasize the importance of flexibility in the transmission planning process to adapt to changing demand forecasts and reduce timelines for critical infrastructure projects. They recommend early and extensive industry involvement, including observer participation in all sessions, to achieve competitive outcomes. Additionally, stakeholders stress the need for clear communication to avoid confusion with ongoing projects and advocate for thorough Indigenous and community engagement.</p> <p>Interest in Participating in the Focused Working Group</p> <p>Stakeholders and communities expressed interest in participating in the Focused Working Group, with some highlighting their extensive experience in transmission asset development. They request that the terms of reference and findings be shared with all stakeholders to</p>	<p>Engagement Plan Feedback</p> <p>The IESO recognizes the need to continue to engage with communities and stakeholders to build up knowledge of transmission-related considerations and key issues to support the eventual roll out of the TSF. The IESO will continue to engage with communities and stakeholders to address areas of confusion or concern as the work to design and prepare for the launch of the TSF continues.</p> <p>Interest in Participating in the Focused Working Group</p> <p>To support broader engagement throughout the design of the TSF, the IESO proceeded with public Focused Engagement Sessions instead of a working group approach.</p> <p>Initial feedback on TSF development</p> <p>To reduce confusion amongst sector participants, the IESO has continued to reinforce the message that the TSF will not affect projects currently under development. In addition, the IESO has proposed project-eligibility criteria to define which types of</p>

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<p>ensure transparency and informed participation. Specific nominations for senior participants have been made to contribute to the TSF development.</p> <p>Initial feedback on TSF development</p> <p>Stakeholders and developers urge the IESO to clearly define the applicability of the TSF and ensure that current projects are not affected. They caution against applying the TSF to existing infrastructure expansions, to avoid regulatory and legal complications and increased costs. Stakeholders and developers recommend focusing the TSF on new projects to maintain efficiency and investor confidence and stress the importance of clarity to support economic growth, energy security, and the energy transition.</p>	<p>transmission projects would be suitable for a competitive process under the TSF – these criteria include:</p> <ul style="list-style-type: none"> - New facilities - Benefit all electricity ratepayers - Estimated cost of \$100M or greater - Nominal voltage of 200kV or greater - Sufficient lead time
<p>Additional comments</p> <p>Stakeholders and communities support the competitive selection process for better ratepayer outcomes, provided it does not delay critical infrastructure projects. They emphasize the importance of a robust and flexible transmission grid to support decarbonization and increased demand. Timely engagement of qualified transmitters and public communication of project decisions are also highlighted as crucial for success.</p>	<p>The IESO recognizes the need to ensure new transmission infrastructure is developed in a timely manner to support economic growth. The IESO has proposed TSF-project eligibility criteria to enable the sector to better understand the types of projects that would be suitable to participate in a competitive process, recognizing that timing/urgency of need should be a key consideration.</p>

Focused Public Engagement Session 1 – February 29, 2024

Summary of Feedback	IESO Responses
<p><u>Focused Engagement Session # 1 Topics:</u></p> <p>Procurement Process Feedback</p> <p>Stakeholders and communities support a fair and transparent procurement process for selecting transmitters, advocating for the inclusion of incumbent transmitters. They favor an RFP approach with clearly defined parameters that allow equal opportunity and encourage innovative solutions. The qualification process should be clear and efficient. A hybrid solicitation process is also supported, drawing on successful examples from other jurisdictions. The RFP process should be prescriptive and well understood.</p> <p>Transmitter Qualification Feedback</p> <p>Stakeholders and developers generally support a pre-qualified transmitter registry. The registry should reduce procurement timelines and increase transparency, requiring periodic updates. Key criteria for qualifying transmitters include experience with project delivery, financial capacity, safety record, and experience with Indigenous partnerships. The process should allow flexibility for transmitters to form new partnerships and SPVs, enhancing competitive value and mitigating risks. Additionally, qualified transmitters should demonstrate experience with Ontario’s regulatory environment and coordination with incumbent transmitters.</p> <p>Bid-Based Approach Feedback</p> <p>Stakeholders and developers support a bid-based approach for initial transmission procurements, emphasizing the need for consistency, simplicity, and clear bid expectations to ensure efficient execution. They suggest assessing bids based on similar maturity and value, while allowing for innovation. Drawing on the UK’s Competitively Appointed Transmission Owner (CATO) model, early-stage bid streams could bring forward</p>	<p>Procurement Process and Transmitter Qualification Feedback</p> <p>Given the support amongst stakeholders and communities regarding use of a qualified transmitter registry and an RFP, the IESO will include these elements in the proposed TSF design. The IESO has noted the need to ensure qualified transmitters are permitted to enter into special purpose vehicles when submitting proposals under the TSF.</p> <p>Bid-Based Approach and Risk Allocation Feedback</p> <p>The IESO expects that the TSF may evolve in the future to enable innovative solutions to be submitted by developers (e.g., moving from a bid-based approach to a more solicitation-based approach).</p> <p>The IESO recognizes that in order for the TSF to be perceived as effective and credible among stakeholders and communities, the criteria used to select proponents must be clear and well understood; as such, the IESO expects to undergo a public engagement and design process prior to finalizing and launching any RFPs under the TSF.</p>

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<p>innovative ideas and expedite project timelines. Additionally, a clear evaluation framework, such as a scorecard, should be provided to prospective transmitters. Stakeholders and communities, particularly Indigenous communities, should be involved in the development of RFPs under the TSF to ensure that their interests and feedback are considered.</p> <p>Risk Allocation Feedback</p> <p>Stakeholders and developers emphasize the importance of balancing cost containment and risk allocation to promote competition while protecting ratepayers. They support a bid-based approach for comparability and suggest that risk allocation should include long-term maintenance responsibilities and clear definitions of shared risks. Transmitters should not bear the cost of unforeseeable risks such as in cases of force majeure. The focus should be on developers with proven experience and the ability to manage risks within reasonable bounds. A transparent evaluation process that considers stakeholder and community input, particularly from Indigenous communities, and incentivizes partnerships is essential for creating value and mitigating risks.</p>	
<p>General Feedback</p> <p>Stakeholders and Indigenous communities recommend that the Transmitter Selection Framework (TSF) should not apply to the expansion of existing transmission facilities, as this could create legal and regulatory challenges and disrupt established Indigenous partnerships. Indigenous communities and developers emphasize the importance of incorporating local content requirements in large-scale investments to support local communities and the economy. Additionally, developers highlight the need for</p>	<p>The IESO will focus initial project eligibility under the TSF to include only new facilities.</p> <p>The IESO will undertake a public process to design the form of the RFP and associated requirements for each eligible procurement under the TSF, where local content requirements can be explored further.</p> <p>The IESO will also continue to explore opportunities to encourage broader participation within the transmission solution development process once the TSF launches and as the framework matures.</p>

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<p>transparency and meaningful incentives in the solution development process, pointing out issues with incentive points in other regions, such as disputes and over-proliferation of proposals. Ensuring fairness and clarity in the evaluation process is very important.</p>	
<p>Future Session Topics</p> <p>For future Focused Engagement Sessions, Stakeholders and communities suggested to include topics on Indigenous community engagement in the transmitter selection framework, detailed information on project eligibility for the competitive transmission process, and any potential changes to transmitter licensing approvals. Additionally, a thorough discussion on the proposal evaluation process, including categories, scoring, weights, and design criteria, would be beneficial.</p>	<p>The IESO continues to engage with Indigenous communities to inform the design of the TSF. Further, the IESO recognizes that Indigenous-community engagement will need to be a key feature of the TSF, ensuring engagement early within the IESO’s transmission planning phase and continuing through to the design of each eligible procurement.</p> <p>The IESO also provided further details on TSF project eligibility and technical and transmission-planning considerations in Focused Engagement Session #4 (June 19, 2024).</p>

Focused Public Engagement Session 2 – March 27, 2024

Summary of Feedback	IESO Responses
<p>Focused Engagement Session # 2 Topics:</p> <p>Bulk Transmission Planning Feedback</p> <p>Indigenous communities and Stakeholders emphasize the need for early and direct Indigenous engagement within transmission planning, highlighting the importance of clear communication about system needs and their criteria. Engaging affected communities in-person to discuss environmental impacts and mitigation is important.</p>	<p>Bulk Transmission Planning Feedback</p> <p>The IESO will continue to engage with Indigenous communities on transmission planning activities which could impact their traditional territories and/or treaty lands, and in preparation for any procurements planned under the TSF, to ensure that Indigenous community perspectives and potential barriers to participation are understood and reflected in the eventual RFP design.</p> <p>TSF Eligibility Considerations</p>

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<p>Including non-incumbent developers in transmission planning can bring innovative solutions, requiring detailed planning knowledge and system information sharing. Recommendations should be detailed and made available early to facilitate competitive procurement processes.</p> <p>TSF Eligibility Considerations</p> <p>Indigenous Communities and Stakeholders generally support the proposed eligibility attributes for the Transmitter Selection Framework (TSF), emphasizing the need for higher cost thresholds to justify administrative expenses. Some highlight the importance of generating electricity locally to reduce transmission losses. There are calls for discussions on facility eligibility timelines and the inclusion of lower voltage developments in the TSF.</p> <p>Additional Eligibility Considerations</p> <p>Indigenous Communities and Stakeholders recommend distinguishing between transmission lines and station work, maintaining existing right-of-ways, and ensuring construction, operation, and maintenance standards are met. Upgrading specific distribution sites for renewable energy projects and transparent carbon pricing policies are also suggested. Ensuring Indigenous participation and avoiding division among First Nations communities are highlighted as critical.</p> <p>Indigenous Participation</p> <p>To enhance Indigenous participation, stakeholders and communities propose increased funding for research and development, direct community engagement, and significant focus on cultural competency training for all involved in energy projects. They emphasize understanding treaties and the</p>	<p>The IESO will continue to review technical criteria for determining which projects are suited for competitive procurement within the TSF (including whether projects recommended for existing ROWs should be included); During Focused Engagement Session #4, the IESO provided clarity around how transmission-needs are identified, and the technical criteria the IESO would likely assess as part of proposal review under the TSF.</p> <p>The >\$100M project-eligibility threshold and voltage minimums are expected to remain as guidelines to strike the right balance, recognizing the costs to run a competitive procurement and the need to ensure projects are sufficiently sized so th developers can secure capital.</p> <p>Additional Eligibility and Indigenous Participation Considerations</p> <p>Within the design of the TSF, consideration for timely development of transmission facilities and back-stops for key risks will be assessed and incorporated.</p> <p>The IESO expects that under the TSF procurements, proponents will need to demonstrate capacity and experience with engaging Indigenous communities and partnering on projects. The IESO will continue to engage with communities to understand how proponents can demonstrate/evidence experience working with Indigenous communities, and how the IESO can continue to support communities through capacity building.</p>

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<p>history of Indigenous relationships with Canadian governments to support self-reliance and sustainable development.</p>	
<p>Future Engagement Topics</p> <p>Suggestions for future engagement topics include non-transmission related topics including upgrades for First Nations and small distribution sites, new business lines like storage and geothermal innovation, and personalized community discussions. Emphasizing the need for cultural competency training and understanding Indigenous history is crucial for moving towards equality and self-determination for First Nations.</p>	<p>The IESO recognizes the interest in non-TSF related topics, however the focus of TSF engagements will continue to be on aspects relevant to transmission planning and transmission project development.</p> <p>The IESO recognizes the importance of proponents/developers understanding Indigenous history and demonstrating experience in engaging with Indigenous communities and enabling Indigenous participation in past projects. The IESO expects that Indigenous experience will be a requirement of participation within future RFPs under the TSF.</p>
<p>General Comments</p> <p>Indigenous Communities and Stakeholders advocate for a defined and integrated process, ensuring clear scope and trigger points. Transparency about water use, support for solar power in Indigenous communities, and encouraging greenfield transmission infrastructure for competitive selection are also emphasized. A flexible transmission planning structure and clear communication about urgent reliability- driven projects are essential to avoid delays and ensure robust grid development.</p>	<p>The IESO understands that a transparent and adaptive transmission planning process will be required to support participation amongst communities within the TSF. The IESO expects that significant new transmission infrastructure will need to be developed in a timely manner to support pace with economic growth and ongoing resource development.</p>

Focused Public Engagement Session 3 – April 24, 2024

Summary of Feedback	IESO Responses
<p>Focused Engagement Session # 3 Topics:</p>	<p>Feedback on Guiding Principles and Indigenous Participation Design Features</p>

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<p>Feedback on Guiding Principles and Indigenous Participation Design Features</p> <p>Indigenous Communities and Stakeholders emphasize the need for clear principles in guiding development of Indigenous participation design features within an RFP, and the importance of well understood criteria for evaluating and awarding bids. They suggest reviewing and assessing the advantages and disadvantages of different approaches to Indigenous participation design features before deciding on the preferred level of prescriptiveness. Establishing specific committees for different First Nation treaty rights holders is recommended.</p> <p>Indigenous Communities and Stakeholders support early Indigenous community involvement in the energy planning process, emphasizing the importance of understanding local treaty rights and interests. They recommend prioritizing participation by local Indigenous communities and establishing clear principles for bid evaluation. Proponents should demonstrate meaningful support from Indigenous communities and their ability to deliver on commitments, including equity ownership and partnership models.</p> <p>Relationship Building</p> <p>Indigenous Communities and Stakeholders highlight the importance of building relationships without adversarial dynamics. Voicing concerns and proposing solutions is crucial for genuine participation, and there is a need for Indigenous communities to be central to key discussions rather than being on the periphery.</p> <p>Continued Engagement and Capacity Building</p>	<p>Given the general support for the use of guiding principles to steer the design of project/procurement-specific Indigenous participation design features, the IESO will include recommended principles within the TSF report-back; the principles will be modified in response to community feedback and shared during Focused Engagement Session #5.</p> <p>The IESO recognizes that Indigenous communities cannot firmly endorse a specific participation approach in the absence of project-specific information, and that a multi-pronged approach to participation should be considered; as such, the IESO will recommend that project-specific Indigenous participation design features be developed for each procurement. However, the IESO will recommend that Indigenous participation remains paramount for every eligible procurement and criteria will be developed for all projects under the TSF.</p> <p>Early and meaningful Indigenous engagement within the transmission planning process will be a key feature under the TSF.</p> <p>Relationship Building</p> <p>The IESO also recognizes the need to support and encourage early relationships between Indigenous communities and developers under the TSF, while being mindful of capacity barriers and potential challenges with exclusivity arrangements which may interfere with communities’ ability to engage with different developers before an RFP bid is submitted to advocate for their desired participation approach.</p> <p>Continued Engagement and Capacity Building</p> <p>The IESO is also exploring mechanisms to ensure all potentially impacted Indigenous communities have an avenue to participate in the project (if they so</p>

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<p>Indigenous Communities and Stakeholders suggest ongoing engagement with First Nation treaty rights holders after project selection and emphasize ownership opportunities. They recommend including capacity funding and building as part of the guiding principles. Addressing conflicts between First Nation treaty rights holders should be encouraged, with the Indigenous Advisory Committee playing a role in conflict resolution. They propose a working group to discuss funding programs for Indigenous equity participation.</p> <p>Timing of Partnerships</p> <p>Indigenous Communities and Stakeholders recommend that proponents should demonstrate support from local Indigenous communities at the bid submission stage. They emphasize the importance of recognizing the active role of First Nations and the need for high-level participation in alignment with UNDRIP principles.</p> <p>Barriers to Participation</p> <p>Indigenous Communities and Stakeholders highlight the need for partnership and participation in decision-making processes, identifying the status quo as a significant barrier. They stress the importance of Indigenous leadership in guiding Canada and creating spaces for themselves, suggesting steps like the FNMPC as positive examples.</p> <p>Indigenous Advisory Committee</p> <p>Indigenous Communities and Stakeholders express strong support for an Indigenous Advisory Committee, seeing it as essential for ensuring a fair voice at the table and benefiting Canada by incorporating Indigenous perspectives.</p>	<p>choose) once a selection under the TSF has been made Transmitter has been selected under the TSF.</p> <p>In preparing for the implementation of the TSF, the IESO will continue to assess and engage on opportunities for Indigenous community involvement in TSF roll-out and/or governance.</p> <p>Timing of Partnerships and Barriers to Participation</p> <p>The IESO is supportive of encouraging early local Indigenous community engagement by proponents and will consider TSF design features that encourage this.</p> <p>The IESO continues to seek feedback regarding barriers for Indigenous communities as they relate to their participation in transmission planning and eventual procurement, including how barriers may be able to be addressed through the Indigenous Energy Support Programs.</p> <p>Indigenous Advisory Committee</p> <p>The IESO notes the support for establishment of an Indigenous Advisory Committee to guide the TSF implementation. As the IESO works through the finalization of the TSF design, it will consider how best to engage with Indigenous community leaders to inform that finalization.</p>

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<p>General Comments</p> <p>Indigenous Communities and Stakeholders appreciate the engagement process and look forward to further discussions. They emphasize the need for sincere invitations and clear communication regarding the repercussions of community engagement. Acknowledging historical divide and conquer tactics, they stress the importance of genuine and respectful engagement with Indigenous communities.</p>	<p>The IESO appreciates the opportunity to engage and dialogue with Indigenous communities and will continue to do so following the TSF report-back. Indigenous community engagement will be a critical component of the transmission planning and procurement-design activities under the TSF.</p>

Focused Public Engagement Session 4 – June 19, 2024

Summary of Feedback	IESO Responses
<p>Feedback on Transmission Planning Engagement Roadmap</p> <p>There is support for the IESO’s approach to engagements regarding the Bulk System Planning Process, and there is recognition that early Indigenous community involvement in the process is of critical importance. There is also an acknowledgement that efforts will continue to be needed to promote Indigenous community engagement in the process and to build capacity to sustain Indigenous participation in transmission planning and procurements under the TSF.</p> <p>Evaluating Technical Considerations within Transmission Proposals</p> <p>The IESO is requested to provide clarity regarding technical aspects of project proposal (and what will be required for developers to provide), and greater details regarding how prospective transmitters will be qualified (e.g. financial capabilities. There is also a desire for a better understanding of TSF timelines,</p>	<p>Feedback on Transmission Planning Engagement Roadmap</p> <p>Early and meaningful Indigenous engagement within the transmission planning process will be a key feature under the TSF; The IESO continues to seek feedback on barriers for Indigenous communities as it relates to participating in both transmission planning and the eventual procurement process under the TSF.</p> <p>Evaluating Technical Considerations within Transmission Proposals</p> <p>The IESO expects to continue to refine and engage on technical requirements associated with proposals under the TSF. The IESO expects to further refine those requirements during the RFP design and engagement process.</p> <p>Enhancing Developer Participation</p> <p>The IESO recognizes that enabling greater layers of participation in transmission planning activities and solutions-development could lead to additional</p>

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<p>including when the first TSF-eligible project(s) will be known.</p> <p>Enhancing Developer Participation:</p> <p>Concerns we raised with respect to whether enabling greater layers of participation in transmission planning activities and solutions-development would truly lead to better outcomes, as it could introduce additional layers of complexity and uncertainty. Additional details are sought from the IESO regarding how increasing additional inputs into the planning process can be managed without threatening an efficient process with refined and timely outcomes.</p>	<p>complexity and uncertainty. In considering how the TSF may evolve in the future to enable innovative solutions t, the IESO will work to enable inputs into the planning process in an efficient and timely manner</p>
<p>General Comments</p> <p>A stakeholder suggested that the minimum 6-year lead-time may be longer than necessary, based on observations from other ISOs/RTOs. Stakeholders generally agree that the TSF project-eligibility should not include customer connections. There remains support for the use of a qualified transmitter registry, and there is a desire for a focused discussion with the IESO on regulatory accounting considerations for new prospective developers.</p> <p>Concerns continue to be expressed regarding potential increased timelines associated with transmission project development under the TSF, and the risks that additional participants in the process may lead to adverse outcomes. There was also concern expressed with the potential expansion of TSF project-eligibility in the future (e.g. to include customer connections), and a request for the IESO to issue a glossary of terms used in the context of TSF project-eligibility.</p>	<p>The IESO recognizes the need to ensure new transmission infrastructure is developed in a timely manner to Ontario’s economic growth. The IESO will focus project-eligibility for the TSF based on the criteria shared during Focused Engagement Session #4 – there are currently no plans for the project eligibility to expand and the IESO notes stakeholders’ concerns with making customer-connections eligible under the TSF.</p> <p>The IESO will continue to engage on regulatory and commercial matters, in preparation for the first RFP(s) under the TSF.</p>

Summary of Feedback	IESO Responses

Focused Public Engagement Session 5 – July 25, 2024

Summary of Feedback	IESO Responses
<p>Feedback on Commercial Approach</p> <p>Indigenous communities and transmitters are generally supportive of the proposed commercial framework (i.e. COD+ contract approach) and Indigenous participation recommendations, including the IEPP and non-exclusivity covenant concepts.</p> <p>Indigenous communities and transmitters note that more work is needed to fully develop the COD+ contract approach and Indigenous participation features, and engagements and dialogue with stakeholders and communities should continue.</p> <p>Feedback on Indigenous Design Features</p> <p>Indigenous communities continue to emphasize the need to ensure long-term participation opportunities are made available to rights holding Indigenous communities within TSF projects. Communities will require time and capacity funding support to participate in discussions with transmitters.</p> <p>Indigenous communities, and one transmitter strongly emphasized the importance of Indigenous experience in qualifying transmitters.</p> <p>Feedback on Evaluation Principles</p> <p>Stakeholders and communities appear generally aligned with the IESO’s proposed proposal-evaluation principles. Specific evaluation and transmitter-qualification criteria were provided for the IESO’s consideration.</p>	<p>Feedback on Commercial Approach</p> <p>The IESO will continue to work to refine the COD+ contract approach and will provide updates and seek input from stakeholders and Indigenous communities ahead of the launch of the initial RFP(s) under the TSF.</p> <p>Feedback on Indigenous Design Features</p> <p>The IESO has recommended that Indigenous participation be a required feature of projects under the TSF, and the IESO will continue to engage to understand how meaningful Indigenous participation (including long-term economic participation) can be supported within projects procured through the TSF.</p> <p>Capacity funding will remain available through the IESO’s Indigenous Energy Support Program to support community capacity building and engagement.</p> <p>The IESO recognizes the importance of ensuring proponents have sufficient Indigenous engagement and partnership experience. To enable time for new-to-Ontario proponents to establish relationships with Indigenous organizations and form partnerships, the IESO expects to assess proponents’ experience with Indigenous engagement and partnerships during the RFP evaluation stage (and not during the Qualified Transmitter Registry stage)</p> <p>Feedback on Evaluation Principles</p> <p>Specific evaluation criteria will be considered and engaged on prior to the launch of the first RFP(s) under the TSF, and the IESO continues to welcome feedback on the proposed evaluation principles discussed during Focused Engagement Session #5.</p>

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<p>Other Feedback</p> <p>One transmitter expressed a desire for cost-recovery provisions for proponents of unsuccessful proposals to be included within the TSF design. One transmitter provided a recommendation that interties not be included as eligible TSF projects, as they believe bi-lateral negotiations are best suited to those types of projects.</p>	<p>Further, it is recognized that some projects may not be suited for competitive acquisition under the TSF, which could include interties.</p> <p>Other Feedback</p> <p>The IESO has not yet determined whether cost-recovery for unsuccessful proposals should be recommended as part of the TSF design. The IESO continues to welcome feedback in considering whether such a measure is needed to promote competition and support fairness while ensuring ratepayer value.</p>