Feedback Form

LT2 RFP: Joint Session IESO, MECP and MNRF

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the LT RFP engagement webpage unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "Confidential".

Following the February 9, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The webinar presentation and recording can be accessed from the LT RFP engagement web page.

Please submit feedback to engagement@ieso.ca by February 23, 2024.

Item	Feedback

Please provide any general feedback to the IESO on what considerations need to be reflected in the LT2 Report Back on the procurement timelines and design to ensure efficient alignment with the proposed MNRF and MECP processes.	Energy Storage Canada (ESC) strongly encourages reconsideration of the stringency of conditions under which a Noise Assessment or Environmental Assessment is triggered when existing wind or solar facilities are seeking to add a storage asset, *i.e.* to become a **hybrid resource**, and thereby provide an additional capacity resource. If a storage resource is being added to an existing wind or solar facility, it should be assessed independently from the existing generation facility. The electrical layout of the additional storage resource should not be a determining factor as to whether an existing facility must amend its existing environmental permit (ECA or REA). Whether the storage asset is connected independently to the electrical grid but near an existing wind or solar asset in a co-located configuration, or behind the meter of the existing wind or solar facility in a hybrid configuration, should not materially matter. The additional storage facility should be evaluated through its own respective approvals processes, which already includes noise acoustics standards and testing requirements. The requirement for existing facilities to meet updated acoustics standards when adding storage will be a significant barrier. If a path for resolution is not found, IESO may not be able to rely on hybridization of existing assets in the medium to long term, which could in turn lead to the need for new assets to be built to replace them. The addition of a storage asset, typically a battery energy storage system (BESS), will have a relatively minor impact on the noise emissions of a wind asset. However, triggering a new amendment under the REA or ECA will impose significant costs, timeline uncertainty, and legal risks that would prove a major impediment to generation owners/operators contemplating upgrades or repowering of their assets. Under these conditions, many otherwise economically viable investments into existing assets will be forgone, and the IESO will be forced to procure additional new assets, ultimately at a higher cost to rate payer and a higher overall environmental impact. ESC endorses the straightforward and prudent approach proposed for the treatment **co-located resources**,

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	whereby a storage asset is connected front-of-the-meter, and thereby not triggering new assessment of any existing wind or solar assets. ESC strongly encourages MECP to treat the environmental assessment of hybrid storage facilities, independent of the existing wind or solar facility, which would result in more upgrades/repowering of existing assets and reduce the need for procurement of new resources.
Please provide what additional details are needed to inform project siting, development, and timelines to ensure projects are in-service by 2030.	ESC would like to request more clarity and details, including proposed timelines, for developers gaining access to Crown Land for pre-development and resource assessment purposes.