

Feedback Form

Corporate Power Purchase Agreements (C-PPAs) Engagement – November 4, 2025

Feedback Provided by:

Name: Gordon Verok

Title: Director of Development

Organization: Horizon New Energy

Email: [REDACTED]

Date: November 17, 2025

To promote transparency, feedback submitted will be posted on the [Corporate Power Purchase Agreements \(C-PPAs\) for ICI participants](#) engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
- ☒ **No – comfortable to publish to the IESO web page**

Following the Corporate Power Purchase Agreement November 4, 2025, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the [Corporate Power Purchase Agreements \(C-PPAs\) for ICI participants](#).

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca by **November 18, 2025.**

General Comments/Feedback

- The requirement for new generation projects to achieve commercial operations prior to being eligible for the C-PPA framework doesn't align with how projects progress through development milestones. Developers are not willing to bear the economic and permitting risk of advancing through development, financing, and construction without offtake certainty. This requirement favours existing generation rather than spurring on renewable development within the province which will result in less competitiveness in the C-PPA framework. The risk and uncertainty related to this requirement limits the ability of the C-PPA framework to effectively accomplish its stated goals of supporting new clean energy investment and cost-saving for Class A customers. It would be helpful if the IESO is able to provide some form of written guarantee that if a project applies under the C-PPA framework and meets all criteria (except for the COD requirement) that the C-PPA would be honoured under the framework.
- Prime Agricultural Land requirements/exemptions should match those within the current/ongoing procurements (LT2e and LT2c). Differing requirements between these two processes will lead to confusion/frustration amongst project stakeholders and limit C-PPA opportunities for Eligible Customers.
- Municipal Resolution requirements should match those within the current/ongoing procurements (LT2e and LT2c). Differing requirements between these two processes will lead to confusion/frustration amongst project stakeholders and limit C-PPA opportunities for Eligible Customers.
- Hybrid facilities should be encouraged under the C-PPA framework to provide Class A customers with more certainty in their ability to avoid GA charges. This is a stated goal of the C-PPA framework. Additionally, hybrid facilities are a benefit to the Ontario grid as they help manage the intermittency of renewable energy generation. Encouraging hybrid facilities to participate in the C-PPA framework will help reduce demand during peak periods and defer investment in new infrastructure (another stated goal of the C-PPA framework). The IESO could limit the total MW of energy storage allowed for a given facility to ensure the Class A customer base responsible for a portion of the GA charges doesn't disproportionately impact other customers responsible for GA charges.
- Projects located on Crown land should be eligible under the C-PPA framework. This would ensure that the most competitive projects across Ontario are selected for C-PPAs, resulting in the greatest benefit for Class A customers.