

Feedback Form

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

Feedback Provided by:

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Date: **November 25, 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

Impact to Other Electricity Consumers & Generation Eligibility

OPG supports using corporate PPAs (C-PPAs) to help drive clean electricity growth in Ontario, however, it is important to carefully design the program to minimize risks for electricity consumers. Under the current proposal, allowing Eligible Purchase Customers to contract with existing Eligible Generation Facilities could lead to higher costs for other consumers if these lower-cost resources are moved into PPAs.

The current proposal appears to provide flexibility and optionality, which is important for meeting Ontario's growing supply needs. We want to emphasize the value of a "hybrid" C-PPA structure that allows new generation to be compensated both through C-PPAs and through other mechanisms, such as an IESO contract. This approach would enable eligible generation to participate in both a C-PPA and a separate revenue mechanism for any remaining capacity, supporting a more robust and diverse supply build-out.

Allowable Exceptions Should Be More General for Fuel Insufficiency

The language in the C-PPA framework specifically allows exceptions for insufficient wind and solar. OPG recommends that the IESO include more general language of "insufficient fuel" to take into consideration other energy sources that may experience fuel limitations beyond their control, e.g. water for hydro, wood pellets for biomass.

In addition, the IESO should specifically identify "**insufficient water**", alongside "insufficient wind or sunlight", in consideration of climate change and increased frequency of extreme weather events, i.e. droughts, that can have impact on water availability.