

# Feedback Form

## Long-Lead Time RFP – September 16, 2025

### Feedback Provided by:

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Date: September 30, 2025

To promote transparency, feedback submitted will be posted on the Long-Lead Time RFP engagement page unless otherwise requested by the sender.

- ☐ **There is confidential information, do not post**  
☒ **Comfortable to publish to the IESO web page**

Following the September 16<sup>th</sup> Long-Lead Time RFP 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 [LLT engagement webpage](#).

**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](mailto:engagement@ieso.ca) by September 30th.**

## Foundational Design Elements

Do you have any feedback on the foundational design elements presented during the webinar?

OPG supports a minimum forty (40) year contract term for hydroelectric projects, and agree that the procurement should be designed for projects which require a lead time of five or more years.

## Resource Eligibility – Energy and Capacity Streams

Do you have any feedback or general comments to share with the IESO regarding defined eligibility for each stream of the LLT RFP?

OPG supports the bifurcation of energy and capacity streams, with a distinct procurement for hydroelectric resources through the energy stream, and compressed air energy storage and pumped hydro storage in the capacity stream. OPG encourages the IESO to continue to explore participation of emerging technologies that demonstrate a sufficient level of technology readiness such as compressed gas, liquid air energy storage, thermal storage and others.

## Resource Eligibility – Hydro Redevelopments

Do you have any feedback or general comments to share with the IESO ahead of the upcoming repowering webinar regarding the participation of hydro redevelopments?

To help inform eligibility under the LLT RFP, the IESO is looking for project specific details from hydro resources that are looking to redevelop, including:

- existing nameplate and/or contract capacity, location, market participant status, original in-service date, remaining useful life and projected end of life;
- expected time required to redevelop the resource, a list of key milestones/activities, and projected operational lifetime post redevelopment; and
- information regarding whether the redevelopment will result in an increased capacity at the facility beyond what is currently registered with the IESO.

If required, please provide project specific information via a separate document.

## Policy Based Rated Criteria: Prime Agricultural Areas (PAAs)

Do you have any information to share with the IESO to inform decisions related to rated criteria for projects locating in PAAs?

Specifically, the IESO is seeking further information, including but not limited to:

- whether proponents are intending to locate their project in a PAA;
- approximate project footprint (in acres), including distinction of surface level and subsurface components;

- land/soil impacts during construction and operation; and
- portion of the land that will remain available for agricultural use post COD.

## Team Member Experience Requirements - Capacity

Do you have any feedback regarding the information presented during the webinar?

## Round Trip Efficiency (RTE) – Capacity

Do you have feedback to help inform the minimum RTE requirement and development of the associated rated criteria.

OPG is supportive of a minimum round-trip efficiency (RTE) and rated criteria. Higher RTE requires less energy input energy to deliver the same output. OPG does not have a view on the minimum RTE, but a lower RTE may affect whether a facility can fully charge and offer their full contract capacity the next day. A rated criteria for RTE would help select technologies with higher RTE which would benefit the overall system efficiency, and the amount of renewable energy needed in the system to offset losses.

## Contract Provisions: Long Term Outages

Do you have any feedback regarding the IESO's proposal related to long-term outages?

The IESO is considering offering successful LLT projects the opportunity to take one long-term outage during the 40-year contract term, permitted only during the second half of the term. This proposal may be restrictive in that resources are operated following best generator practices, and equipment warranties may require specific manufacturer operation/maintenance/outage requirements.

The IESO is also proposing a maximum long-term outage duration of six months. With respect to the allowable outage duration, there is not a "one size fits all" solution. OPG recommends that the IESO look to industry standards for outage durations for different technology types. For example, from OPG's experience, hydro outages typically may last up to 24 months, but could potentially last as long as 36 months, depending on the scope and complexity of the work.

Thus, OPG recommends that the requirements above (i.e. the timing of the long-term outage and the duration of the outage period) be technology-specific in accordance with manufacturers' requirements / industry best practices.

Additionally, during the long-term outage period, time contract payments will not be paid to the Supplier and nonperformance charges would not apply. Non-payment during the long-term outage period (i.e. no revenue for 6 months) may result in financial/economic hardship for the Market Participant (MP). OPG recommends that the IESO consider a levelized payment structure, e.g. pro-rating the payments over the 40-year contract term, and providing continued payment over the long-term outage period to ensure steady revenue stream to the MP in support of the MP's financial viability.

## Contract Provisions: Environmental Attributes

Do you have any feedback regarding the information shared during the webinar?

OPG believes that ownership of the Environmental Attribute should remain with the Supplier. In our view, the proposed contract structure, where the Supplier retains exclusive rights to the EAs for the first 20 years of the 40-year LLT contract, followed by a sharing mechanism for the remaining 20 years, introduces unnecessary complexity and does not align with LT2, which LLT generally emulates. OPG looks forward to reviewing further details in IESO's future engagement and providing additional feedback.

## General Comments/Feedback

The IESO's current deliverability test methodology uses 50% of the rated capacity of the additional storage to assess whether it is deliverable. The LLT RFP has Must Offer Obligations, whereby resources must offer their full contract capacity into Day Ahead Market (DAM) between 7am-11pm on Business Days. The IESO should consider in the deliverability test whether the storage charging rate at 50% of the rated capacity is appropriate. With >8-hour charging systems, operators may need to charge at 100% full charging rate to be ready to offer full contract capacity in the DAM.