

# Feedback Form

## Long-Lead Time RFP – January 28, 2026

### Feedback Provided by:

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Date: February 11, 2026

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

☐ **NO - There is confidential information, do not post**

☒ **YES - Comfortable to publish to the IESO web page**

Following the January 28<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 RFP 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 February 11, 2026.**

## Policy Considerations

### Buy Local Policy Provisions

The IESO is seeking stakeholder feedback to understand:

1. Whether proponents were already planning to source at least 50% of goods, services and workforce related to the project locally (i.e., from Ontario/Canada)
  - a. For those Proponents that were not planning this, is it possible and what would the cost implications be?
2. An indication of Projects that would be unable to source at least 50% of goods, services and workforce locally regardless of cost implications

Are there any other considerations the IESO should be aware of?

Is there any additional feedback you would like to provide in response to the proposed local supply plan requirement currently under consideration?

Hydrostor supports in principle the Buy Local provision that is being considered as part of the LLT RFP. We expect that at least 50% of combined capital costs on goods, services, and workforce for our project will be procured locally (Ontario/Canada), but the ultimate language of the Buy Local provisions will determine whether there are additional cost implications (if any).

Regarding the information the IESO presented at this webinar around potential Proposal Submission requirements: it will be important for the IESO to consider that proponents are unlikely to have selected/shortlisted their contractors and materials at the Proposal Submission stage. It is easier to commit to a plan to source at least 50% of **combined** capital costs for goods, services, and labour from Ontario/Canada, and Hydrostor recommends the IESO leans into this approach as it achieves the intended outcome of the Buy Local provisions. It will be much more difficult to identify with a reasonable degree of accuracy the component suppliers/contractors for specific goods, services, and labour at the more granular level by the time of Bid Submission, in order to identify specific sub-categories of spending that will be sourced from Ontario, from Canada, and from other countries.

Should Suppliers be required to report on their progress post-contract award, the IESO needs to ensure that so long as the Supplier is meeting the combined 50% threshold, they have the ultimate flexibility on the procurement plan itself – since procurement plans may need to change constantly in order to manage supply chain timing and costs.

## LLT Design Considerations

### Resource Eligibility – Capacity

Do you have any feedback on the proposed updates to resource eligibility requirements for LLT Capacity Projects?

### Access Rights for LLT Energy Projects

The IESO is seeking feedback on the following:

#### Requirements for Projects Locating on Federal Crown Lands

- Process for obtaining access rights to federal Crown lands.
- Timelines related to obtaining a federal priority permit and what stage Proponents would expect to have reached by the Proposal Submission Deadline (e.g., priority permit granted)

#### Modifications Required to the Project Site Definition

The LLT(e) RFP currently defines Project Site as all Properties on which the proposed LLT Energy Project is to be located, excluding any Connection Line.

- The IESO would like to understand whether this should be updated to consider other impacts of hydro projects (e.g., flood zones) that will be known at the time of Proposal Submission Deadline

Is there any other feedback regarding access rights that the IESO should be aware of?

### Periods of Reduced Water Availability (Energy)

Do you have any feedback on the proposed approach for mitigating financial impacts in instances of high-market pricing where Facility production is impacted by conditions outside of the Suppliers' control?

### Regulation Service Readiness Requirements

Do you have any feedback on the proposed regulation service readiness requirements?

Hydrostor anticipates being able to meet the Regulation Service Readiness Requirements being proposed by the IESO as part of the LLT(c) procurement, and will review the details included in the next draft of the LLT(c) contract when that is published for feedback.

### Prescribed Forms

Do you have additional feedback to share on the draft Prescribed Forms?

*Note: Stakeholders are welcome to attach a separate document that contains comments on the draft documents. Please indicate if separate documents are confidential.*

Hydrostor appreciates the IESO providing the prescribed forms in advance of the procurement launch. We are currently reviewing and will provide feedback on specific items if identified.

## General Comments/Feedback

Hydrostor welcomes the opportunity to comment on the IESO's considerations around the LLT RFP. Hydrostor is a global leader in the development of utility-scale LDES solutions, using its proprietary Advanced Compressed Air Energy Storage technology (A-CAES). A-CAES is an emission free, cost-effective, reliable and commercially ready technology that is currently deployed in Canada with advanced development projects in Australia and in the United States.

Do you have additional feedback to share with the IESO?

**Reserve Price:** Hydrostor continues to have reservations about the Reserve Price process outlined by the IESO previously. We recommend a process to set the Reserve Price which is transparent and one that captures the unique attributes of Long-Lead Time Projects and technologies.

**Deliverability:** Hydrostor appreciates the IESO taking a more flexible approach when assessing deliverability for LLT projects. We support the IESO taking the longer-term view that includes all future transmission upgrades being planned for or being considered as part of any deliverability assessment. As the development process progresses post-contract, if Suppliers are able to achieve a COD that is earlier than the Milestone COD of 2035, and if grid conditions can support this earlier COD, then an earlier COD should be allowed following the process outlined by the IESO.