

Feedback Form

Long Lead-Time RFP – February 26, 2026

Supply Chain Disclosure - Feedback

Feedback Provided by:

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Date: March 5, 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 February 26th 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 Long Lead-Time 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 by March 5, 2026.

Supply Chain Disclosure

Do you have any feedback on the proposed requirements and incentives that are under consideration related to supply chain disclosure?

I support the province's efforts to encourage investment in Canada, where possible, through this procurement and through subsequent procurements of all technologies. This is becoming increasingly important in the current political environment.

Please indicate how the proposed requirements and incentives under consideration would impact project decisions regarding the sourcing of goods and services.

Is a 75% threshold (for civil works or total spend) for Canadian goods and services is achievable for your project?

- Based on my experience the 75% threshold for civil works goods is reasonable.
- Based on my experience the 75% threshold for services is reasonable, provided that the definition of Canadian Services includes any company that has a physical location, employees and pays taxes in Canada, regardless of where the company has its head office.
- Based on my experience the threshold for total project spend should be adjusted to 50%, as was initially proposed by the IESO in the January engagement session.

Do you have any feedback that should be considered when establishing definitions of terms such as: "Canadian Materials", "Canadian Services", "Canadian Supplier", "Civil Works"?

- Civil Works for hydroelectricity should include dams, dykes, overflow spillways, penstocks, canals, fishways, the powerhouse, storage and maintenance facilities, access roads, substation foundations and yards, spill containment works, telecommunication structures, and powerline corridors. While typically considered mechanical works, I would recommend including gates, stop logs, and trash racks in the definition of Civil Works as these can be readily sourced from within Canada.
- Canadian Materials should include equipment and materials associated with Civil Works.
- Canadian Services should include all labour and services associated with Civil Works as well as engineering, environmental, local and Indigenous engagement, legal, and financial services.
- Canadian Supplier, as noted above, should be any company that has a physical location in Canada, has Canadian employees, and pays taxes in Canada.

Do you have any additional feedback that should be considered in relation to this policy?

Development of waterpower projects is significantly more complex and takes significantly longer than other forms of renewable energy thereby increasing the risk associated with these projects. However, waterpower projects provided additional value as they are predictable, reliable, help stabilize the grid, and support significant local and Canadian economic investment. This policy and this procurement should be structured to recognize both the higher project risks and higher potential economic benefits related to local and Canadian investment to optimize the success of this procurement.

To do so, as a minimum, this policy should award Rated Criteria Points for meeting specific thresholds for Canadian content as has been proposed by the OWA.

To address risk, I would strongly recommend that the IESO establish and inform proponents of both the Reserve Price and liquidated damages associated with failure to achieve the Canadian content thresholds established in this policy. WRT the Reserve Price, I understand the IESO is concerned that the release of this price may erode the competitiveness of the procurement process. To address this concern, the IESO could establish and publish a range for the Reserve Price that would give developers some idea of the price threshold they will need to meet to prepare a successful bid. To add further "teeth" to this policy, the IESO could also include a multiplier to the Contract Price for projects that are able to demonstrate that they have met the Canadian content thresholds upon achieving COD (i.e., up to 5% increase in the Contract Price above the Bid Price). This approach is reasonable, recognizing that developers will incur additional administrative expenses and possibly some additional supply chain costs in adhering to this policy.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

To optimize the success of this procurement, I believe it is imperative for the IESO to establish and publish the Reserve Price or a range for the Reserve Price, and that the IESO extend the timeline for submission of proposals as the currently proposed submission date of October 1, 2026 does not provide adequate time to secure access rights, local and Indigenous support, finalize Indigenous partnerships, or prepare a price proposal that adequately addresses the complexity and risks of waterpower projects including adhering to this new Canadian content policy.