Feedback Form

Long Lead-Time RFP – April 23, 2026

Feedback Provided by:

Name: Linda Heron

Title: Chair

Organization: Ontario Rivers Alliance

Email: [redacted]

Date: 30 April 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
- X YES - Comfortable to publish to the IESO web page

Following the April 23rd 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 April 30, 2026.**

Procurement Milestones

Do you have any feedback on the procurement milestones, specifically the proposed dates for the Proponent's deadline for submitting questions and comments and the Proponent's deadline for registration?

ORA's concern is not limited to the dates themselves. The deeper problem is that the procurement milestones are being advanced after the Minister's Directive has already established the fundamental outcome: a protected LLT energy stream open only to new hydroelectric projects, with an expected commercial operation date as late as May 1, 2035, and a 40-year contract term. The April 23 presentation confirms that the energy stream will target up to 1 TWh of annual imputed production, that only new hydroelectric resources may participate, that successful proponents will receive an Enhanced Power Purchase Agreement-style revenue model, and that the contract term is 40 years.[1],[2]

That structure materially prejudices the public-interest analysis. It moves Ontario directly into procurement design for new hydropower before the IESO has demonstrated that new hydropower is necessary, least-cost, climate-resilient, environmentally acceptable, or superior to faster and lower-risk alternatives. This is especially troubling because the IESO's own August 2025 *Hybrid Resource Portfolio Equivalency Assessment* modelled wind, solar, and battery energy storage portfolios and found that hybrid portfolios could serve 99.5% to 99.98% of the peaky-need scenario and 99.7% to 99.9% of the baseload-need scenario. The same report also explains that battery storage improves the capability and performance of variable generation by shifting low-cost generation to hours of higher system value.[3]

Accordingly, the procurement milestones should be suspended or extended until IESO provides a transparent public reconciliation between its own August 2025 modelling and the Minister's decision to create an exclusive hydro-only LLT energy procurement. The public should not be asked to accept a 40-year ratepayer-backed procurement for a risky water-dependent resource when IESO has already demonstrated that low-risk wind, solar and storage portfolios can meet future needs with high reliability.

The proposed milestone schedule also does not provide sufficient time for municipalities, Indigenous communities, riparian landowners, conservation organizations, and members of the public to understand the true footprint of proposed hydropower projects. For waterpower, the "Project Site" cannot be treated as merely the powerhouse, dam, intake, or Crown land polygon. The real project footprint includes the headpond, inundated lands, altered upstream and downstream reaches, bypassed reaches, flow fluctuation zones, wetlands, tributaries, access roads, transmission connection, temporary works, staging areas, and all lands and waters affected by altered flows and water levels. A proponent should not be able to secure procurement standing without disclosing the full hydraulic footprint at the bid stage.

Will the environmental process be able to effectively address these high-impact projects after a contract is signed? No, these proposed projects will move forward under a proponent-led, self-screening, fast-tracked process that does not ensure public consultation or a fair and effective environmental assessment process.

ORA recommends that IESO not proceed with final registration and proposal milestones for new hydroelectric projects until it has required full hydraulic footprint disclosure, climate-adjusted hydrology

modelling over the full contract term, public release of watershed-scale cumulative effects screening, and a transparent ratepayer impact analysis for the 40-year obligation.

Supply Chain Disclosure Plan

Do you have any feedback on the implementation of the Supply Chain Disclosure Plan policy requirements in the LLT RFPs?
Do you have any feedback on the Supply Chain Disclosure Plan Prescribed Form?
Do you have any feedback on the requirements related to the Committed Canadian Content Percentage incentive?

ORA is not commenting on the buy-Canadian policy objective itself. ORA's concern is that the supply-chain incentive should not be allowed to obscure the fundamental public-interest question: whether new hydropower should be procured at all. Canadian content may be a legitimate procurement consideration, but it does not account for the environmental impacts and ecosystem costs of new dams, the climate vulnerability of hydropower, or the ratepayer risk created by 40-year contracts for water-dependent generation.

The April 23 presentation acknowledges that a Canadian-content evaluation discount is applied only in evaluation and does not reduce the price the successful proponent is paid. IESO also acknowledges that, because projects will be prioritized based on this incentive, "*there is a potential for more expensive projects to be selected compared to less expensive projects that are not seeking this incentive.*"[1] In other words, the evaluation discount can make a proposal appear more competitive without actually lowering the ratepayer-funded contract price.

That admission is important. If more expensive projects can be selected because of evaluation incentives, IESO must provide a transparent ratepayer-impact analysis showing how much additional cost consumers may bear. **This is particularly important in the LLT energy stream because the stream itself is already restricted to new hydroelectric projects. Layering evaluation preferences on top of an exclusive hydro-only stream risks compounding cost rather than controlling it.**

ORA recommends that IESO disclose the expected ratepayer impact of each evaluation incentive, including any scenario where a higher-priced hydropower project is selected over a lower-cost alternative. IESO should also confirm that no supply-chain incentive will be used to justify advancing a project that has unacceptable river, climate, cumulative effects, or ratepayer-risk implications.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

1. **The LLT energy stream is a protected lane for new hydropower, not a technology-neutral procurement or best for ratepayers and taxpayers.**

The April 23 Minister's Directive and IESO presentation confirm that the LLT energy stream is open only to "*new hydroelectric projects, other than pumped hydroelectric storage."* The capacity stream is open only to long-duration storage of eight hours or more, including pumped hydroelectric storage. This means that new hydroelectric generation is not competing against wind, solar, battery storage, hybrid portfolios, or actual non-emitting resources in the energy stream. It is competing only against other methane-emitting, climate-vulnerable, and water-dependent hydropower projects.[1],[2]

That is a major policy choice. It cannot credibly be described as technology-neutral or least-cost procurement. It is a political carve-out for new hydropower. The Minister's Directive itself states that long-lead resources are "*not well-suited*" to competing against resources with shorter development timelines and lifespans, such as wind, solar and inverter-based battery systems, but can offer *"unique benefits"* through resource diversification.[2] In plain language, the Minister has removed the very resources that IESO's own analysis shows can meet future system needs with high reliability, and has created a protected procurement lane for new cost and time-intensive, methane-emitting and climate-vulnerable hydropower instead.

If new hydropower cannot compete against wind, solar and storage on cost, timeline, risk, and environmental performance, that is not a reason to shelter it from competition. It is a reason to question whether it should be procured at all. The public interest is at risk.

2. IESO's own 2025 modelling undermines the rationale for a hydro-only LLT energy stream.

ORA applauds the IESO for its August 2025 *Hybrid Resource Portfolio Equivalency Assessment*, which is highly relevant to the LLT RFP. The report studied *"the reliability and economics of variable generation and BESS resource portfolios to meet system needs traditionally supplied by dispatchable resources."* It found that for the peaky-need scenario, a wind/solar/BESS hybrid portfolio could achieve 99.5% to 99.98% load served, while a gas + wind/solar/BESS portfolio achieved 100% load served at a lower net present value than the gas-only option in seven of ten weather years. For the baseload need scenario, wind/solar/BESS portfolios achieved 99.7% to 99.9% load served.[3]

It is also essential to consider that you can turn a gas-fired facility off when a cleaner, more effective electricity source becomes available, but you can't turn off the methane coming from a hydropower facility until the dam is removed—likely not for 100 years.

The report is careful to state that it is not a final resource plan. However, it remains IESO's own modelling, using IESO's own planning assumptions, and it was expressly intended to inform future planning practices, modelling capabilities, and resource procurement initiatives. **It cannot, therefore, be ignored when the Minister directs the IESO to create an exclusive 40-year procurement stream for new hydropower, only months later.**[3]

The key question for the IESO is simple: Why is the province advancing a hydro-only 40-year energy procurement when IESO's own modelling shows that wind, solar and storage portfolios can meet future needs with very high reliability, faster deployment, little to no river impacts or dependence on future water availability? Is that in the public interest or is it a political decision?

3. The "Energy Superpower" objective and Ontario Water Association lobbying are materially influencing procurement beyond demonstrated Ontario need.

ORA is concerned that the LLT RFP is not being driven solely by Ontario's domestic electricity reliability needs. It appears to be driven by the broader "Energy Superpower" objective set out in *Energy for Generations*.[5] That objective materially changes the scale and purpose of procurement. It moves Ontario beyond prudent least-cost planning into a system-expansion agenda that risks building generation and transmission capacity for broader industrial, export, and political objectives, leaving ratepayers, taxpayers, and our grandchildren to bear the long-term financial consequences.

The IESO's 2025 Annual Planning Outlook and related planning materials already reflect a substantial upward revision in expected demand, from approximately 60% growth in the 2024 APO to 75% growth by 2050 in the 2025 APO. That 15 percentage-point increase significantly expanded the scale of projected need, yet there has been no consolidated public financial accounting of what the combined transmission, hydropower, nuclear, storage, and procurement build-out will cost ratepayers and taxpayers over the next 20 to 40 years. It is also worthy to note that the IESO's 2026 APO has brought the expected growth factor back down to 60% by 2050. So, again, why are we moving ahead with this high-risk and high-cost LLT RFP for hydropower?

Notably, the government did not campaign on becoming an "Energy Superpower," nor did it seek a public mandate for the resulting scale of generation, transmission, and long-term financial commitments now being advanced.

Recent governance developments also raise legitimate public-interest questions about institutional independence in electricity planning. In November 2025, the Province appointed former Ontario Power Generation President and CEO Ken Hartwick as Chair of the Independent Electricity System Operator Board. At a time when Ontario is advancing major nuclear, hydropower, storage, and transmission expansion, public confidence depends on clear evidence that independent system planning, including IESO's own August 2025 modelling and Ontario's climate science, is being weighed objectively and not subordinated to broader institutional momentum toward large-scale generation build-out. When policy direction, procurement design, and governance leadership all begin pointing in the same direction, independent scrutiny becomes more important—not less.

The LLT RFP must not be used as an implementation tool for an Energy Superpower agenda unless the IESO or the Minister first provide a transparent public accounting of actual Ontario system needs, export-oriented assumptions, total capital exposure, contract cost exposure, transmission-enabling costs, and the cumulative ratepayer and taxpayer impacts.

4. The 2023 Ontario Provincial Climate Change Impact Assessment has not been integrated into hydropower procurement.

One of the most serious technical failures in the LLT hydropower framework is the total lack of integration of Ontario's own 2023 Provincial Climate Change Impact Assessment (OPCCIA). Hydropower is not fuel-free. Its fuel is freshwater.

Ontario's climate projections do not point to stable hydrology. They point to greater variability: reduced snowpack in some regions, earlier spring runoff, longer and hotter summer low-flow periods, increased evaporation losses, more frequent and intense drought and flood events. For hydropower, that means less predictable seasonal generation, reduced dependable summer output when electricity demand is often highest, greater operational volatility, and increased pressure to spill or bypass water during

extreme events. A 40-year hydro contract that ignores these foreseeable conditions is not prudent planning; it is deliberate risk loading onto future ratepayers.

A credible long-term hydropower procurement must therefore treat climate-driven water availability, seasonal flow shifts, drought risk, evaporation, flood extremes, and hydrologic variability as central design constraints.

The OPCCIA documents climate risks to Ontario infrastructure, natural systems, water resources, and communities, including increasing temperatures, changing precipitation patterns, more extreme weather, and **growing risks to water-dependent infrastructure.** Canada's *Changing Climate Report* similarly documents changes in snowpack, runoff timing, freshwater availability, streamflow, drought and flood extremes across Canada. These are not speculative risks. They are foreseeable conditions that must be incorporated into any 40-year hydropower contract.[4],[10]

Yet *Energy for Generations* does not even mention climate change, let alone integrate the OPCCIA into electricity planning, and the LLT RFP materials do not show climate-adjusted hydrology as a mandatory bid requirement for new hydropower. ORA has seen no requirement for proponents to model output under climate-adjusted seasonal flows across the full 40-year contract term, no requirement to disclose late-summer drought performance, no requirement to distinguish spring freshet installed capacity from dependable summer generation, and **no explicit exclusion preventing foreseeable drought and low-flow conditions from being treated as force majeure.** In fact, the **IESO reported that it relies on historical data rather than future climate projections**.

That reliance on backward-looking hydrology is fundamentally inconsistent with Ontario's own climate science, which projects increasingly non-stationary water conditions over the coming decades. Planning a 40-year water-dependent energy contract using historical hydrology as the primary reference point materially understates foreseeable operational risk.

This is a fundamental planning failure. If Ontario is going to lock ratepayers into 40-year contracts for water-dependent generation through approximately 2075, then IESO must require climate-adjusted hydrological modelling, drought-year output profiles, seasonal generation profiles, and public disclosure of performance under OPCCIA-consistent scenarios. Without this, ratepayers are being asked to underwrite a resource whose fuel supply is becoming less reliable over time.

In fact, the LLT framework appears to preserve contractual relief mechanisms that could shift certain performance risks from proponents to ratepayers if climate-consistent hydrologic conditions are not clearly excluded from force majeure or comparable relief provisions.

At minimum, the contract should expressly clarify that foreseeable climate-consistent hydrologic conditions, including prolonged drought, reduced snowpack, earlier runoff, chronic late-summer low flows, and elevated evaporation losses, do not qualify for contractual relief and remain fully within the proponent's commercial risk.

5. New hydropower carries significant river, ecosystem and climate impacts.

New hydropower is not environmentally benign. Dams and waterpower facilities alter flow regimes, block or delay fish movement, fragment riverine habitat, trap sediment, alter water temperature, impair water quality, affect wetlands and riparian areas, increase mercury methylation risk in reservoirs and headponds, and can fundamentally change the ecological character of a river. On smaller rivers and

more environmentally sensitive systems, the problem is often worse because projects rely on pondage and daily peaking to create saleable output from limited flow. The result is frequently a cascade of small facilities affecting many kilometres of river for modest energy output.

Hydropower reservoirs and impoundments also emit greenhouse gases, including methane, through well-documented biogeochemical processes involving flooded organic matter, sediment methane production, and ongoing organic inputs. Deemer et al. provide a global synthesis of greenhouse gas emissions from reservoir water surfaces, while Lessmann et al. identify reservoir peaking as a significant methane emission pathway.[8],[9]

In fact, independent peer-reviewed studies report that hydropower's reservoirs in boreal and temperate regions can reach the level of a gas-fired facility and can persist throughout the dam's full lifecycle, approximately 100 years or more. [12],[13],[14],[15],[16]

These studies reinforce ORA's concern that treating hydropower as categorically "non-emitting" is scientifically false and would assign environmental benefits to projects whose lifecycle emissions are not being acknowledged, measured or accounted for.[8],[9]

It's also crucial to note that there are 224 hydroelectric facilities in Ontario, and only 2 that have any kind of fish passage (only eel passage), and there is no requirement for up-front decommissioning financial provisions when these dams no longer serve a useful purpose.

The LLT RFP does not address these impacts in any way commensurate with the 40-year contract term or the permanent or long-term alteration of rivers. The procurement framework appears to focus on whether an applicant can assemble access rights, provide deliverability, support confirmations, meet Crown land reporting requirements, and provide deliverability information. Those are not substitutes for a watershed-scale cumulative effects analysis, a full hydraulic footprint assessment, public and Indigenous consultation, effective fish passage, and enforceable decommissioning obligations.

The draft Access Rights framework reinforces ORA's concern that project disclosure remains site-based rather than impact-based. For hydropower, the mapped "Project Site" may describe only the legal parcel, Crown polygon, or facility footprint. It does not necessarily disclose the full hydraulic footprint, including inundation extent, altered reaches, drawdown zones, wetland hydrologic effects, tributary backwatering, shoreline fluctuation zones, and associated infrastructure corridors. For river systems, that distinction is critical because the ecological footprint is watershed-scale, not parcel-scale.[18]

6. Crown land access and MNR streamlining increase environmental and public-interest risk.

The April 23 presentation explains that the Public Land Site Report (PLSR) is a proponent-led due diligence screening tool that uses an attestation-based approach. It also states that the PLSR does not provide or guarantee rights, title, tenure, or future project approvals. At the same time, once a bid is submitted, MNR recognizes the PLSR as a pending application under the Public Lands Act with priority to surface rights over subsequent mining claim registrations and Public Lands Act applications while bids are evaluated by IESO. This gives proponents an important procedural foothold before full environmental, public, municipal, and Indigenous review has occurred.[1],[11]

The presentation also identifies new acknowledgements for waterpower applicants regarding their need for authority to access or impact lands that may extend beyond the Project Site. This confirms ORA's

concern that the full hydropower footprint may extend beyond the mapped project lands. **That is precisely why the IESO must require applicants to disclose all lands and waters that may be affected by inundation, water-level manipulation, drawdown, tailwater changes, access roads, and construction activities before municipal or Crown support confirmations are treated as meaningful.**[1]

MNR's stated interest in expediting approval timelines for waterpower development activities under the Lakes and Rivers Improvement Act and streamlining Public Lands Act approvals, including pre-development activities, is highly concerning. Ontario has already **weakened public participation and environmental scrutiny under the Class EA for Waterpower**. Further streamlining risks turning procurement into the de facto approval decision, with environmental review reduced to a later-stage implementation exercise after commercial expectations have already been embedded.[1]

ORA recommends that IESO require full hydraulic footprint mapping, including the headpond and all affected upstream and downstream reaches, as a mandatory provision before municipal and Indigenous support confirmations and procurement applications. A powerhouse polygon is not a hydropower footprint. A Crown land shapefile that omits inundation, altered flow reaches, or affected wetlands is not sufficient for public-interest screening.

7. OWA and Xeneca feedback confirms that proponents are seeking risk protection and cost transfer.

The Ontario Waterpower Association's (OWA) feedback confirms that they know the immediate risks and drawbacks. The industry's primary concern is not environmental protection or climate resilience, because they know they are protected under force majeure, it is investor confidence, reserve price risk, indexation, and ensuring that the first LLT-e procurement does not "*fail by design."*

OWA states that the reserve price has "*the very real potential to compromise this procurement"* and recommends broader inflationary index protection tied not only to CPI but to factors such as Government of Canada long-term bond rates, steel products manufacturing, copper and foreign exchange rates. These requests would increase proponent protection and transfer more economic risk to ratepayers.[6] Put simply, hydropower is struggling to compete on cost, deployment timeline, environmental footprint, and climate-adjusted reliability against wind, solar, and battery storage portfolios. They can't compete without special carve-outs for hydropower.

Xeneca's feedback is also revealing. Xeneca objects to a single LLT round, warns of bottlenecks, questions MNR capacity, and argues against a reserve price, stating that competent preparation of greenfield sites can range from $250,000 to considerably more for preliminary engineering, design, surveying, First Nations and municipal engagement, hydraulic modelling, and capital cost work. That is a candid admission that greenfield hydropower is capital-intensive, speculative, and financially risky before a project even reaches formal approval.[7] Yet, the Minister of Energy wants to go that route.

Neither OWA nor Xeneca provides a credible answer to the central public-interest questions: Why should ratepayers fund 40-year contracts for new water-dependent generation when IESO's own modelling shows that wind, solar and storage portfolios can meet needs with high reliability? **Why should Ontarians accept additional river fragmentation, inundation, altered flows, algae and greenhouse gas emissions from reservoirs when lower-impact alternatives exist? Why should foreseeable climate-driven hydrologic risk be shifted to electricity consumers?**

8. Ratepayers and taxpayers are being positioned as the financial backstop.

The LLT energy stream offers hydropower proponents a highly favourable package: an exclusive procurement lane, a 40-year contract, an Enhanced PPA-style revenue model, potential evaluation advantages, Crown land process alignment, and regulatory streamlining. At the same time, industry submissions seek greater indexation, weaker reserve-price constraints, greater investor certainty, and additional procurement opportunities if the first round does not deliver the desired hydro volume.

The financial risk is not theoretical. The draft LLT(e) contract establishes a formal monthly payment regime over a 40-year term, provides secured lender protections, and expressly contemplates future government support programs, including subsidies, grants, and performance-based support. If climate-driven drought, altered runoff timing, reduced summer flows, or chronic low-water conditions reduce hydroelectric output, Ontario consumers may still remain exposed to fixed contractual costs while also paying for replacement electricity, balancing services, transmission support, and any related public subsidy commitments. In practical terms, less water can mean less electricity, but not necessarily less public cost, and potentially much higher cost.[17]

Climate change is already altering these hydrological patterns, with increasing frequency and severity of drought events across Ontario and the broader Great Lakes basin.

> *"The $63 million net loss for the year ended March 31, 2025 was an improvement from the net loss of $157 million in the previous fiscal year. While low water conditions continued to have a material impact on financial results in fiscal 2025, the improvement over the prior year was largely driven by lower fuel and power purchases and increased domestic electric and natural gas revenues, partially offset by higher operating and administrative and finance expenses."*[19]

Manitoba Hydro's recent drought-related losses provide a real-world example of how hydrologic underperformance can materially affect utility finances, even in a large hydro-dependent jurisdiction. Ontario should not ignore that warning.

That means the very periods when electricity demand is often highest, hot, dry summer conditions, may increasingly coincide with reduced hydroelectric generation, increasing Ontario's reliance on replacement power precisely when electricity is most expensive.

Ontario ratepayers committed to 40-year E-PPAs will bear equivalent risks if the hydrological assumptions underlying proposed projects fail to materialize.

The public is being asked to carry the downside risk while proponents retain the upside. Ratepayers would ultimately pay for long-term contract obligations, transmission enabling costs, replacement power if hydrology underperforms, environmental attributes if not retained for public benefit, and potential stranded or decommissioning liabilities. Taxpayers may also be implicated through public funding, federal credits, infrastructure support, and broader energy policy subsidies. This is not prudent affordability planning. It is risk transfer. And the IESO will consider hydro projects as small as 1 MW, which creates even more risk because these hydroelectric projects will be the first to fail on smaller, more flow-challenged, and more sensitive systems.

This exposure is magnified because Ontario's desire to be an Energy Superpower is simultaneously advancing more than 30 major transmission projects, nuclear refurbishment and expansion, long-duration storage procurement, and additional generation contracts, yet no consolidated public

accounting has been provided showing the combined long-term cost burden that will ultimately fall on ratepayers and taxpayers.

The draft contract defines environmental attributes broadly to include clean energy credits, offsets, certificates, and all related revenues, entitlements, benefits, and proceeds. If ratepayers are funding long-term revenue certainty through 40-year contracts, those environmental benefits should accrue fully to the public, not become an additional private upside stream layered on top of publicly supported project economics.

Before IESO proceeds, the Province must provide a consolidated public accounting of the full cost of the LLT RFP, including expected contract payments, transmission-related costs, Crown land and regulatory process costs, public funding exposure, environmental attribute treatment, and replacement-power risk under climate-stressed hydrology scenarios.

9. ORA Recommendations:

1. IESO must not proceed with a protected LLT energy stream for new hydropower unless and until it publicly reconciles the Minister's Directive with IESO's August 2025 *Hybrid Resource Portfolio Equivalency Assessment* and demonstrates that new hydropower is necessary, least-cost, climate-resilient, and in the long-term public interest.
2. IESO should require climate-adjusted hydrology modelling for every proposed hydropower project, including seasonal output, drought-year performance, late-summer low-flow performance, and projections across the full 40-year contract term using OPCCIA-consistent scenarios.
3. Foreseeable drought, low-flow conditions, reduced snowpack, altered runoff timing, and other climate-consistent hydrologic conditions must be expressly excluded from force majeure and must remain the proponent's risk.
4. IESO should require full hydraulic footprint disclosure before municipal and Indigenous support confirmations, including the headpond, inundation area, drawdown zone, altered upstream and downstream reaches, bypassed reaches, wetlands, tributaries, access roads, transmission connections, staging areas, and all lands and waters affected by altered flows or water levels.
5. IESO should prohibit new small hydropower projects that provide negligible system value relative to watershed fragmentation, particularly projects under 10 MW.
6. All environmental attributes, clean energy credits, and related proceeds associated with ratepayer-funded LLT contracts should accrue to ratepayers for the full contract term or, at minimum, for the full cost-recovery period.
7. All LLT hydropower contracts should include enforceable decommissioning and financial assurance requirements sufficient to remove facilities when they are no longer viable, no longer in the public interest, or causing unacceptable environmental harm.
8. The IESO must publish a full ratepayer and taxpayer exposure analysis before finalizing the LLT RFP, including contract payments, transmission costs, escalation and indexation exposure, reserve price assumptions, environmental attribute treatment, climate assessment for replacement power risk, and public funding exposure.

9. IESO must confirm that no Crown land, Public Lands Act, Lakes and Rivers Improvement Act, or Class EA process will be streamlined in a manner that weakens public, municipal, Indigenous, or environmental scrutiny of proposed waterpower projects.

In Closing:

The LLT RFP, as currently structured, does not protect Ontario rivers, ratepayers or taxpayers, and is not in the public interest. It creates a hydro-only energy stream, offers 40-year revenue certainty to proponents, advances long-lead water-dependent infrastructure with a 100-year lifespan, without visible integration of Ontario's own climate science, and responds to industry pressure for greater investor protection while leaving the public to bear long-term environmental and financial risk.

Ontario does not need to sacrifice rivers to meet electricity needs. IESO's own modelling shows that wind, solar and battery storage portfolios can meet future needs with very high reliability. The responsible course is to prioritize lower-impact, faster-deploying, scalable resources, protect existing rivers, and ensure that any long-term procurement is grounded in climate science, cumulative effects assessment, and transparent ratepayer accountability.

Ontario should not lock households, businesses, and future generations into decades of avoidable financial and environmental liability for a climate-vulnerable energy source when lower-impact, scalable, increasingly cost-effective, and climate-resilient alternatives already exist.

Linda Heron
Chair, Ontario Rivers Alliance
info@ontarioriversalliance.ca

Cc: Stephen Lecce, Minister of Energy – MinisterEnergy@Ontario.ca
Marit Stiles, NDP Leader – Mstiles-QP@NDP.on.ca
Jamie West, NDP Energy Critic - JWest-QP@NDP.on.ca
Peter Tabuns, NDP - TabunsP-co@NDP.on.ca
Stephen Blais, Liberal Caucus – SBlais.mpp.co@Liberal.ola.org
Jonathan Pinto, CBC Up North - Jonathan.Pinto@cbc.ca

Endnotes:

1. *Independent Electricity System Operator (IESO), Long Lead-Time Request for Proposals, April 23, 2026, presentation. https://www.ieso.ca/-/media/Files/IESO/Document-Library/long-lead-time/LLT-2026/llt-rfp-20260423-presentation.pdf*
2. *Minister of Energy and Mines, Directive to the Independent Electricity System Operator respecting the Long Lead-Time Request for Proposals, April 23, 2026.*
3. *Independent Electricity System Operator (IESO), Hybrid Resource Portfolio Equivalency Assessment, August 2025.*
4. *Climate Risk Institute, Dillon Consulting, ESSA Technologies Ltd., Kennedy Consulting and Seton Stiebert, Ontario Provincial Climate Change Impact Assessment Technical Report, prepared for the Ontario Ministry of the Environment, Conservation and Parks, 2023. https://www.ontario.ca/files/2023-08/mecp-ontario-provincial-climate-change-impact-assessment-en-2023-08-17.pdf*
5. *Government of Ontario, Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7, June 2025. https://www.ontario.ca/files/2025-07/mem-energy-for-generations-en-2025-07-18.pdf*

6. *Ontario Waterpower Association, Long Lead-Time RFP March 26, 2026 Feedback Form, submitted April 14, 2026. Available through the IESO https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/llt/llt-rfp-20260415-feedback-form-OWA.pdf*
7. *Xeneca Power Development, Long Lead-Time RFP March 26, 2026 Feedback Form, submitted March 27, 2026. Available through the IESO. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/llt/llt-rfp-20260415-feedback-form-Xeneca.pdf*
8. *Bridget R. Deemer, John A. Harrison, Siyue Li, Jake J. Beaulieu, Tonya DelSontro, Nathan Barros, José F. Bezerra-Neto, Stephen M. Powers, Marco A. dos Santos, and J. Arie Vonk, "Greenhouse Gas Emissions from Reservoir Water Surfaces: A New Global Synthesis," BioScience 66, no. 11 (2016): 949–964. https://academic.oup.com/bioscience/article-abstract/66/11/949/2754271?redirectedFrom=fulltext*
9. *Benjamin Lessmann, Tonya DelSontro, Martin Schmid, Carsten Schubert, Andreas Lorke, and Bernhard Wehrli, "Methane Emissions Due to Reservoir Flushing: A Significant Emission Pathway?" Biogeosciences 20 (2023): 4057–4075 https://bg.copernicus.org/articles/20/4057/2023/*
10. *Elizabeth Bush and Donald S. Lemmen, eds., Canada's Changing Climate Report, Government of Canada, Ottawa, 2019. https://changingclimate.ca/CCCR2019/*
11. *Ontario Ministry of Natural Resources, Renewable Energy on Crown Land, including Public Land Site Report materials referenced in the IESO LLT April 23, 2026, presentation. https://www.ontario.ca/page/renewable-energy-crown-land*
12. *Calvo Buendia, E., et al., editors. 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. IPCC, Switzerland. 2019. https://www.ipcc.ch/report/2019-refinement-to-the-2006-ipcc-guidelines-for-national-greenhouse-gas-inventories/*
13. *IPCC. 2022. Climate Change 2022: Impacts, Adaptation and Vulnerability (Working Group II, AR6). https://www.ipcc.ch/report/ar6/wg2/*
14. *DelSontro, Tonya, McGinnis, Daniel F., Sobek, Sebastian, Ostrovsky, Ilia, Wehrli, Bernhard, 2010, Extreme Methane Emissions from a Swiss Hydropower Reservoir: Contribution from Bubbling Sediments. Online: https://pubs.acs.org/doi/full/10.1021/es9031369*
15. *Maeck, A., DelSontro, T., McGinnis, D.F, Fischer, H., Flury, S., Schmidt, M., Fietzek, P., and Lorke, A., 2013. Sediment Trapping by Dams Creates Methane Emission Hot Spots, Environmental Science and Technology, 8130-8137, Online: http://www.dx.doi.org/10.1021/es4003907*
16. *Soued, C., Harrison, J.A., Mercier-Blais, S. et al. Reservoir CO_2 and CH_4 emissions and their climate impact over the period 1900–2060. Nat. Geosci. **15**, 700–705 (2022). https://doi.org/10.1038/s41561-022-01004-2*
17. *IESO: Draft LLT(e) Contract, April 1, 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/long-lead-time/LLTe-Contract-Draft-20260401.pdf*
18. *IESO: Draft LLT(e) Draft: Prescribed Form: Access Rights, April 14, 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/long-lead-time/LLTePF-Draft-AR100-Access-Rights-Declaration-20260414.pdf*
19. *Manitoba Hydroelectric Board – 74th Annual Reports, FY2023–24 and FY2024–25. Drought-related operational losses were publicly reported. https://www.hydro.mb.ca/docs/corporate/annual_report_2024_25.pdf*