

Feedback Form

Repowering Existing Facilities – October 20, 2025

Feedback Provided by:

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Date: Nov 21, 2025

To promote transparency, feedback submitted will be posted on the Long Lead-Time 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 Repowering Existing Facilities 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 Stakeholder 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 November 21, 2025 .

Repowering Existing Facilities

Currently in Ontario, grid-connected wind and solar facilities have four general options when they approach the end of their contract term:

1. Enter into a new 5-year contract with the IESO via the Medium-Term RFPs and continue operations, with the option to end the contract early if the facility wins a Long-Term RFP repowering contract;
2. Enter into a corporate PPA arrangement with a private buyer and continue operations;
3. Operate as a merchant facility; or
4. Decommission the facility.

Two additional pathways have emerged via recent engagements between the sector, the IESO and the government – to extract further value from existing facilities that ratepayers have already invested in:

1. Proponent enters into a new 20-year contract with the IESO via the Long-Term RFPs (potentially competing with new-builds OR via a separate repowering stream or program), fully redevelops / rebuilds the facility ('like new'), and continues providing value to ratepayers for another 20+ years.
2. Proponent enters into a new [5-12] year contract with the IESO via the Medium-Term RFPs, performs work on the facility to extend its operating life and potentially its output, and continues operations for [5-12] years, with the option to end the contract early if the facility wins a LT RFP repowering contract. (See recommendations below for more details)

CanREA recommendations

- Repowering under LT RFPs: CanREA supports IESO procurements and policies that preserve the value of existing renewable facilities that ratepayers have already invested in, while also investing in critical net-new assets – the Ontario electricity system **needs both** to support near-term reliability. Regarding the potential for competition between repowered facilities and new-build facilities, CanREA has members who are prioritizing repowering existing facilities and members who are prioritizing new-build facilities (and some both). Given this, CanREA is taking a neutral position regarding whether (1) proposed repowered facilities should compete with new-builds via the LT RFPs or (2) proposed repowered facilities should participate via a separate repowering stream of the LT RFPs or another IESO procurement or program.
- Under the MT RFPs, the IESO should enable proponents to bid various contract lengths (e.g. 5-12 years) paired with various prices. The IESO should not limit the number of pairings proponents may propose, to ensure that proponents will have maximum flexibility to determine the optimal investment pathway for life extension of their facility. Proponents should not be required to submit detailed facility life extension workplans and costs – CanREA

submits that this would not be in the interest of proponents nor the IESO to get into this level of detail with respect to individual facilities. In the spirit of outcomes-based procurement, the IESO can and should rely on the performance obligations and mechanisms in its contracts to ensure that facilities meet their obligations over the contract term.

- **Local Generation Program:** Many CanREA members also have a strong interest in the IESO's Local Generation Program (LGP) currently under development. The LGP serves a critical gap for recontracting – and potentially repowering – thousands of existing smaller facilities and building net-new clean electricity resources in the 'missing middle' distribution-connected size bracket, between ~100kW and ~10MW. CanREA recommends that the IESO consider the above concepts, pathways and recommendations in its design and development of the LGP.

LT2 Window 2 Timing Considerations

We understand that the IESO has communicated that it will not be able to provide updated LT2 window 2 general connection guidance until late Q3 2026, following the results of the LT2 e-1 and c-1 RFPs.

We also acknowledge that municipal elections will be held across Ontario in October 2026, and that municipal councils have various lengths of 'black out' periods before and after municipal elections take place, with respect to council decision-making.

CanREA recommendations

- Given the above circumstances and timing challenges, CanREA recommends that the proposal submission deadline for the LT2 Window 2 Energy RFP should occur later in Q1 2027.
- CanREA submits that the IESO should issue the LT2 e-2 RFP as far in advance of the proposal submission deadline as possible. This will help to provide a clear signal – including associated guidance, documentation, forms, etc. – to proponents, municipalities, Indigenous communities and other stakeholders well before bids are due.

General Comments/Feedback