

# Feedback Form

## Long-Term 2 RFP – April 21, 2026

### Feedback Provided by:

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Date: May 8, 2026

To promote transparency, feedback submitted will be posted on the Long-Term 2 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 April 21<sup>st</sup> Long-Term 2 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-Term Procurement 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 May 8, 2026.**

Brookfield Renewable appreciates the opportunity to provide feedback.

## **Transparency and Information Disclosure**

Do you have feedback on whether the IESO should publish additional non-price information about proposals that were not selected in LT2 Window 1?

Do you have feedback on the potential benefits and risks of increased transparency for unsuccessful proponents in future procurement windows?

- We welcome additional non-price information about proposals that were not selected, as long as the information is published in an aggregated fashion. For example, the total MW of offers categorized by technology type, % of First Nation equity partnership, number of offers from existing vs new projects... We generally welcome transparency and information access, as information helps proponents prepare their participation in future RFPs.

## **Repowering Eligibility Framework**

Do you have feedback on the proposed requirement that facilities complete a minimum of three years of a medium-term contract before becoming eligible for repowering?

Do you have feedback related to scenarios where repowering work may overlap with existing contract obligations?

- We welcome the proposal that allows MT contracts to be terminated after three years, to immediately bridge into a LT2-W2 RFP contract.
- Under the current proposal, all repowering work and new projects must be completed by the same fixed MCOB (i.e., May 1, 2032). And on slide 15, the IESO indicates that "Proponents must specify whether they intend to complete all repowering work after terminating their MT contract or complete some portion of it while still operating under their MT contract." For projects completing some portion under their MT contract, the IESO indicates:

- “Any modification to equipment used to generate under their MT contract would require approval for a Facility Amendment under their MT contract
- If completing repowering work during the MT Contract term, the Supplier would need to continue to fulfill all obligations of their existing MT Contract”

We would welcome further detail and clarification on (a) the conditions of such approval for a Facility Amendment, and (b) confirmation that projects will be allowed to partially reduce their operational MW capacity and expected annual production without causing a breach of their obligations of their MT contract during such overlap.

## **Alternate Eligibility Pathways for Repowering**

Do you have feedback related to specific existing facilities that do not fit into the proposed repowering framework and may justify an alternate pathway? Please include as much detail as possible (technology type, facility age, contract history etc.).

Recognizing that such details are important to the IESO’s decision making in this matter but potentially also commercially sensitive to asset owners, please feel free to mark such details as confidential on this form or, alternatively, reach out to the IESO by email to schedule a meeting to discuss your situation.

## **Definition of Repowering**

Do you have feedback on the definition of repowering? i.e., on the potential use of technology specific equipment replacement thresholds to define repowering?

- We generally welcome the IESO’s proposals that are flexible and outcome focused. Importantly, we support obtaining an Independent Engineer’s Attestation as a requirement, and not distinguishing between “partial” or “full” repowering.
- In general, the IESO should focus on the resulting facility—regardless of whether it is a new-build or an existing asset—to ensure that it can deliver power to the grid in a safe and reliable fashion for the contract term. In this context, we do not support imposing a technology specific equipment replacement threshold to define repowering. Put another way, proponents should only be held accountable for the resulting project’s delivery and performance. And the IESO should allow proponents the flexibility to pursue innovative and project-specific solutions to achieve repowering. In our view, technology-specific equipment replacement specifications or

threshold would only impose design, reporting, and audit costs that would ultimately be borne by ratepayers. However, it is unclear what benefits these added costs would bring, when the project can simply be certified by an Independent Engineer to protect ratepayer interests.

- In sum, the competitive nature of the RFP already ensures a demonstrably effective outcome with regards to price, while the Independent Engineer's attestation (and the legal contract awarded by the RFP) would ensure that project delivery and performance can be achieved. There is no need to further impose administrative costs that would create regulatory burden and increase bidding prices.

## **Repowering Guardrails and Risk Mitigation**

Do you have feedback on the use of enhanced independent engineer certification as a key safeguard for repowering projects?

Do you have feedback on the potential application of modified or increased performance security requirements for repowered facilities?

Do you have feedback on whether these proposed guardrails are sufficient to manage performance and longevity risks?

- We support the Independent Engineer's attestation.

## **Deliverability Guidance and Timing**

Do you have feedback on the IESO's proposed phased approach to deliverability guidance updates for LT2 Window 2?

- As noted in our previous comments, we ask that repowering bids from existing facilities be exempt from as long as.

## **General Comments/Feedback**

Do you have additional feedback to share with the IESO?