

Feedback Form

Long-Term 2 RFP – April 21, 2026

Feedback Provided by:

Name: Eric Muller

Title: Director of Policy for Ontario

Organization: Canadian Renewable Energy Association (CanREA)

Email: [REDACTED]

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 21st 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 by May 8, 2026.

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?

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?

CanREA submits that facilities should not be required to complete any minimum term of a medium-term contract before becoming eligible for repowering.

CanREA continues to generally advocate for as much flexibility and optionality as possible for owners and operators of existing facilities in Ontario. Every facility has its own unique characteristics, circumstances and economic considerations. Every facility should have the ability to determine its optimal next steps and pathway at the end of its contract. These pathway options may include:

- Repowering via Long-Term RFP contract.
- Continued operations or life extension via flexible Medium-Term RFP contract for 5-15 years, with the option to end the contract early if the facility wins a LT RFP repowering contract.
- Recontract under the IESO Local Generation Program (if eligible).
- Corporate / Virtual PPA arrangement with a private buyer.
- Operate as a merchant facility.
- Decommission the facility.

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

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?

CanREA agrees with and supports the IESO's proposal for a "non-prescriptive, performance-based framework for defining repowering, anchored by independent engineer certification [and] LT2 contract performance obligations."

Technical details of repowering should remain at the developer's discretion due to the array of options for different technologies and the facility-specific nature of repowering.

We also agree with the IESO's objective to avoid additional administrative burden and risk of unintended exclusions associated with a more prescriptive approach.

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?

Deliverability Guidance and Timing

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

CanREA supports the IESO's proposed three-phased approach to deliverability guidance updates for LT2 Window 2, as outlined during its April 21, 2026 engagement webinar.

The sector would like to emphasize that it requires as much clarity and detail as possible regarding transmission capacity and deliverability information, and any associated underlying assumptions – especially in Northern Ontario – to enable developers to continue investing in pre-development activities in order to submit high-quality project proposals into the LT2 Window 2 RFP.

To generate further investment certainty and confidence, the IESO should consider committing to publishing updated deliverability guidance as a regular, ongoing 'IESO product' once every quarter. This would provide clarity, confidence and certainty to the sector, especially as multiple procurements

and other developments are impacting grid connections and deliverability at a faster and more frequent pace than in the recent past.

Going forward, the IESO may also consider committing to a timeline service standard for publishing updated deliverability guidance. For example, the IESO would commit to publishing updated deliverability guidance no later than one (1) month after any IESO RFP contracts are awarded going forward, to reflect outcomes in a timely manner and provide useful and timely information to the sector.

Furthermore, the IESO may also consider producing and providing detailed transmission capacity availability visuals and maps, similar to what other provinces provide, to more clearly and accurately signal to proponents where 'hosting capacity' may be available for prospective clean electricity generation projects.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

CanREA understands that Municipal and Indigenous Support Resolution requirements are expected to apply for repowering project proposals under LT2 window 2, which would treat new-build projects and repowered projects alike regarding these particular requirements.

With respect to policies regarding agricultural land and other environmental permitting for repowering project proposals, CanREA submits that repowering projects should be exempt from these requirements. The IESO has rightfully acknowledged that existing facilities may be located in agricultural areas and were originally approved under previous permitting regimes, and thus would have a very difficult time repowering under existing LT RFP rules. Imposing new agricultural land or permitting requirements for existing facilities seeking to repower would limit the pool of potential repowering projects at a time when the IESO has stated it needs significant amounts of energy from both new-build and repowering projects.