

Feedback Form

Long-Term 2 RFP – April 21, 2026

Feedback Provided by:

Name: Paula Peel

Title: n/a

Organization: n/a

Email: [REDACTED]

Date: 2026-05-06

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?

No

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

From a community advocacy perspective, transparency ensures that proponents cannot 're-package' a fundamentally flawed or environmentally damaging project in a future window without addressing the specific reasons for its previous failure. As understanding as we may be that there are issues of commercial sensitivity, these should not override the public interest in knowing that procurement decisions uphold the highest standards of land-use planning and local consent. Transparency is particularly vital in repowering existing facilities, where the public needs (and deserves) every assurance that these projects are being held to the same modern environmental and social standards as new bids. In any case, at the end of the day, transparency ultimately benefits both proponents that are successful and those that are not, in holding them up to the exact same standards of accountability. Establishing clear, consistent standards of accountability de-risks the process for the IESO, stakeholders, and host communities alike.

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?

All things considered, a three-year window for repowering wind facilities before becoming eligible for repowering is a reasonable and much-needed requirement, that ought to be mandatory. A three-year window gives everyone concerned time to see how the wind facility would operate before it is granted a new 20-year lease on life, while bearing in mind: (1) its environmental record over the past twenty (or so) years (which may or may not be as exemplary as some would wish); (2) the expectation that current infrastructure may be replaced by larger, higher-output turbines that may potentially be located in environmentally-sensitive areas and in locations that are more populated now; and (3) that wind facilities that received approvals from the Ministry prior to O. Reg. 359/09 were not held to the same requirements as they now are. Many of the older wind turbines are likely not in compliance with the current regulation and will need to be removed or relocated (if possible). All these things necessitate new studies and assessments demonstrating compliance with more stringent requirements, and that takes time.

That said, a shorter window might be appropriate for solar facilities and other energy generation facilities if their environmental footprint remains the same.

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

Regarding scenarios where repowering work may overlap with existing contract obligations, the IESO must ensure that these transitions do not result in a 'double-dip' of public funds.

Many of the original FIT contracts issued between 2009 and 2012 were characterized by extravagant pricing—rates that were unnecessarily high and far exceed current market value. If a proponent chooses to decommission early to begin repowering, the IESO should not continue to pay those legacy premiums for power that is no longer being produced. It goes without saying that those high rates should not be 'rolled over' into the new contract.

Any overlap should require a mandatory 'settle-up' period where the legacy contract is terminated at the moment physical repowering work begins, ensuring that the ratepayer is immediately moved to a modern, more competitive rate structure. MT contracts are often priced lower than original legacy contracts. This saves ratepayers money by ensuring we aren't overpaying for "old" infrastructure while the developer prepares their repowering plan.

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.

My feedback concerns this "alternate pathway", specifically whether this pathway may lead to "piecemeal repowering". While it is understandable that some existing facilities may not fit into the proposed repowering framework, these kinds of scenarios can all too easily lead to a "fragmented" approach to repowering. Piecemeal repowering is a problem for a community and for the grid:

- 1. The "Construction Forever" Problem: If a proponent repowers 5 turbines this year, 5 next year, and 5 the year after because they lack the capital to do it all at once, the community is subjected to a permanent construction zone over a prolonged period. This means ongoing heavy truck traffic and construction-related noise, dust and extended community disturbance;**
- 2. The "Stranded Asset" Risk: If a company starts repowering but runs out of money halfway through, you could end up with a "checkerboard" facility where half the**

turbines are spinning and the other half are sitting idle or half-built. Where repowering involves the installation of much larger turbines, smaller turbines may (or may not) be dismantled and may (or may not) be removed from the site in a timely fashion, especially where funding is an issue. This half-finished industrial landscape is a visual and economic blight on the community.

The IESO's framework must ensure that repowering is a singular, comprehensive event rather than a fragmented process driven by a proponent's liquidity or funding issues. A piecemeal approach creates several risks and causes far more distress to communities.

I urge the IESO to reject alternate pathways that allow for phased repowering. Proponents should be required to demonstrate full financial closure and a commitment to a unified construction schedule before being granted a repowering contract.

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?

Just a reminder that repowering is not simply a technical upgrade. Repowering is a complicated process of transitioning an older wind facility over to a new facility that fully complies with current government regulations and environmental policies for, among other things, noise and visual impact studies, natural heritage studies and risk assessments (eg. bat/bird mortality), and community consultation and indigenous engagement.

In regard to an IESO-specific definition of "repowering", technology-specific specifications should be more than prioritizing more efficient wind turbine generators. The recommended specifications must include modern environmental mitigation technology, for example acoustic deterrents for bats, bird-safe blade markings and state of the art shut-down and cut-in speed capability. The IESO is well positioned with LT2 to lead the way in North America with environmental safeguards.

I understand that the IESO is endeavoring to avoid risk of unintended exclusions associated with a more prescriptive approach but this flexibility should not come at the expense of preventable bird and bat mortalities. Without a prescriptive requirement for modern environmental safeguards, the IESO risks "grandfathering" wind facilities that are known for their high mortality rates into another 20-year contract period.

Ref: Natural Resources Canada: "Review of Bat Fatality Mitigation Studies and Recommendations for Canada" (Canmet Energy, 2024)

https://publications.gc.ca/collections/collection_2025/rncan-nrcan/M154-196-2024-eng.pdf

Repowering Guardrails and Risk Mitigation

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

Independent Engineer Certifications must be shared with the host community to avoid 'box-checking" and to respect the public's need for accountability and transparency.

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

In regard to modified or increased performance security requirements, this guardrail should be expanded to protect communities, such that a portion of the performance security is earmarked for decommissioning funds. In the event that a repowered project fails, the infrastructure won't be left to rust in a field for 20 years. Performance Security requirements should explicitly include guaranteed funds for full site decommissioning at the end of the new contract term that includes a guarantee that lands will be restored to their original state.

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

No

Deliverability Guidance and Timing

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

No

General Comments/Feedback

Do you have additional feedback to share with the IESO?

No