Feedback Form

Long-Term 2 RFP – April 21, 2026

Feedback Provided by:

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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.**

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**
- ☐x **YES - Comfortable to publish to the IESO web page**

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

General Comment on Repowering

To be eligible for repowering or other contract extension, the owner must be operating the facility within the terms of its Renewable Energy Approval. A key issue is completion of acoustic audits as required by the approval for the project. Many projects have not posted information on these audits on their project website (another requirement) that confirms that they have met the acoustic audit requirement. This suggests that a large number of projects have not completed the audit requirement.

Compliance with the requirements of complaint handling/resolution process of the approvals is another key concern. Project operators have not consistently taken the steps necessary to resolve most complaints. It is not appropriate to assume that since complaints have stopped the problem has been resolved as it is unrealistic to expect people to continue filing complaints if no action is being taken.

Both of these gaps suggest that some existing turbines are located too close to residents. Once the project is built, it is difficult to address these issues without moving or shutting down turbines. Expiry of the contract ends the government's commitment to the project which provides an opportunity to address these concerns. Once the initial contract for the project has expired, these issues related to specific turbines need to be addressed before contracts to extend the life of a flawed project are granted. In this context, repowering projects that require fewer turbine locations could present an opportunity to fix earlier mistakes with problem turbines being removed from the project.

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?

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?

General Comment

The term "no increase in footprint" is frequently used in the context of repowering. This term needs to be defined. For regulations affecting wind turbines, the distance between each individual turbine and various receptors is the key metric. Shifting the location of some turbines even by a few metres can cause the turbine to be in conflict with the requirements of Regulation 359/09. In these cases, "footprint' needs to mean the location of the existing towers.

Similar concerns exist relative to increasing the tower height as it is a key factor in determining the distance exposed to the noise emissions from the operation of the turbine. Longer blades interacting with the extended tower will also increase the low frequency noise/infrasound emissions from the turbine.

Before larger, more powerful turbines are used to replace smaller, less powerful technology, the full range noise of outputs from the new turbines needs to be assessed. This includes both audible sounds plus low frequency noise/infrasound emissions that are the source of many problems with existing turbines. Based on these tests, appropriate setbacks to protect nearby residents should be developed. Discussions related to proposals related to LT2 proposals indicated that the absence of this information was one of issues that factored in rejections of municipal support resolutions.

If repowering requires the use of more prime agricultural land than the current configuration, the new restrictions should apply. Protecting the agricultural industry is provincial priority and the IESO needs to start championing energy generation that is designed around technologies that use substantially less of this important resource, rather than land intensive users like wind turbines and ground-mounted solar panels.

A good example is biogas facilities that use waste products from intensive livestock production facilities to generate electricity. Production from these facilities is dispatchable rather than being dependent on wind or sun conditions. The facilities would fit within the secondary use and limited

area requirements of the October 2024 Provincial Policy Statement. They would also be more acceptable to agricultural communities that have rejected wind and solar facilities.

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?

General Comments/Feedback

Do you have additional feedback to share with the IESO?

The end-to-end RFP process needs to be reviewed to confirm who is responsible for ensuring that the project meets the site-specific requirements set out in provincial land use guidelines for energy project including the IESO's RFP documentation.

Based on available information, it appears that at least one of the projects selected for LT2 Window 1 fails to comply with these requirements. The ground-mounted project, requiring 80 acres of Class 1 soils that are being actively farmed. The site is located within one of the two zones used in the Official Plan of the municipality to protect farmland.

The proponent should bear at least some of this responsibility. Not only this project but most of the wind projects proposed for Southwestern Ontario for the last round did not comply with the directives in the October 2024 Provincial Policy Statement, specifically the proviso that limited use of Class 1 to 7 soils to energy projects. These projects are to be secondary uses requiring a limited area which the Ministry of Agriculture, Food and Agribusiness defined as 1 HA or 2.3 acres. In

addition, the IESO received a directive prohibiting ground-mounted solar projects on agricultural land.

Despite this direction, most of the wind projects proposed for Southwestern Ontario were to be located on prime agricultural land. When one site was rejected by a municipality, the proponent moved to a new site on agricultural land.

The documentation developed by the IESO, including the Agricultural Impact Assessments, are causing confusion as they are not fully aligned with the direction in the Provincial Policy Statement. Municipalities are required to follow the provincial policy statements when developing their Official Plans, zoning decisions and issuing building permits – a fact confirmed by the IESO in response to a question during the RFP process. To support this direction, all IESO documentation related to evaluation of proposals in the context of a Municipal Support Resolution needs to be tightly aligned with the direction in the Provincial Policy Statement.

Overall proponents ignored the directives from the IESO and other government agencies without any consequences. This places municipalities in an awkward position where they have dual direction from government as to what is allowed while proponents in an IESO RFP process are pressuring them to ignore this direction.

If the IESO is looking for municipalities, including planning staff, to enforce these restrictions on the use of agricultural land, the instructions to the municipalities need to be amended to reflect this expectation. Proponents would also need to be more precise in their presentations. Currently plans supporting municipal support resolutions are positioned to the host community as potential siting options.

Verification that projects meet the requirements of the Provincial Policy Statement and IESO terms should also be part of the IESO process before contracts are offered. The first project in the list of contract offers suggest flaws in this IESO process.