

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 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?

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.

Eligibility Requirements

The IESO is proposing that to be eligible to participate in the LT2 Repowering RFP, an existing electricity generating facility that as of May 1, 2032, will have completed an IESO (or OEFC) contract with term \geq 20 years, and at least 3 years of one full MT contract term \geq 5 years.

Can the IESO please clarify whether the 20-year contract requirement is referring to the length of a single contract or the length of multiple IESO/OEFC/OPA contracts that a facility has had? If it is for a 20-year continuous contract, then this requirement is overly onerous.

There are facilities in Ontario that have been in operation for more than 23 years and should be eligible for repowering, but do not meet the prescriptive requirement of a 20-year IESO/OEFC/OPA contract + 3-year MT contract. OPG believes that these stations meet the intent of IESO's Repowering framework, but are disallowed from participating under current proposed eligibility requirements.

If the IESO is merely requiring proof of the age of the facility to prevent premature repowering, then the original COD or the COD of the last repowering where significant changes were made to the electricity generating equipment should be considered instead. Additionally, would previous facility upgrade /conversion have an effect on the consideration of the contract length and preclude said facility from participating in the repowering procurement?

OPG recommends the following:

- **Establish a pathway for facilities to pursue repowering even if they have not completed a ≥ 20 -year IESO/OEFC/OPA and/or ≥ 3 years of a 5-year MT contract.**
- **Any facility that has operated for 23 years or more, regardless of historic contract status, be eligible to participate in the LT2 Repowering RFP. This approach would enable these end-of-life facilities to support the IESO's intent to bring additional value to the ratepayer, as well as mitigate concerns for premature repowering.**

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?

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?

OPG thanks the IESO for the opportunity to provide feedback on this engagement and looks forward to working closely with the IESO on this and future engagements.