Feedback Form

Long-Term 2 RFP (Window 2) – October 14, 2026

Feedback Provided by:

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Email: [redacted]

Date: November 10, 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 October 14th, Long-Term 2 RFP Window 2 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 October 30, 2026.**

Rated Criteria

Locational Criteria

- Do you have feedback on the proposed locational scoring framework, including the treatment of different zones, technology types, and repowering projects?

Non-Wires Alternatives (NWA)

- Do you have feedback on the proposed NWA opportunities, including eligibility, scoring, and the approach to assigning points?

Agricultural Land Considerations

- Do you have feedback on the proposed treatment of prime agricultural areas, agrivoltaics, and potential agricultural exemptions?

LT2(e-2) Contract Design

Non-Performance Charges (NPCs)

- Do you have feedback on the proposed NPC changes, including technology-specific thresholds and the treatment of monthly production factors?

Evolving Value of Energy Storage

- Do you have feedback on how the evolving reliability and capacity value of energy storage should be reflected in LT2 evaluation, scoring, or procurement design?

Repowering

- Do you have feedback on the proposed Independent Engineer certification requirements?

- Do you have feedback on the proposed treatment of repowering projects within LT2 competition and evaluation processes?

Regulation Service Readiness

- Do you have feedback on the proposal to require regulation-service readiness for LT2 projects?

- Do you have feedback on the proposed technical requirements and any associated cost, schedule, or implementation impacts?

Deliverability and System Performance

- Do you have feedback on the proposed deliverability methodology, including regional congestion assumptions and transparency of information available to proponents?

- Do you have feedback on the proposed treatment of short-circuit strength, minimum system strength requirements, and emerging technologies such as grid-forming inverter-based resources?

- Do you have feedback on the proposed circuit availability maps and any additional information that would support project siting and proposal development?

General Comments/Feedback

Do you have additional feedback to share with the IESO?

The Mississaugas of the Credit First Nation (MCFN) submits this response directly under General Comments rather than within the narrow technical framework of the questionnaire because the LT2 Window 2 draft design still fails to resolve the core concerns MCFN has raised throughout 2025 and 2026. Across formal correspondence from Chief Claire Sault on July 4, 2025, our February 5, 2026 consultation meeting on the LLT RFP, our July 21 and September 2, 2026 emails, and our November 2, 2026 discussion, MCFN has consistently identified major structural and procedural flaws in the IESO process. Although the IESO has adjusted minor Indigenous elements in its procurement documents, none of those updates resolve MCFN's objections, forcing our Nation to repeat the exact same feedback across every project and procurement window.

In Window 2, the IESO expanded Locational Rated Criteria points under the Energy Stream to the Southwest and West electrical zones and released Preliminary Connection Guidance directing developers toward available grid capacity in areas such as West of Middleport and West of Detweiler. These areas lie directly within MCFN's exclusive Treaty lands and traditional territory. At the same time, the IESO left the Indigenous Participation rated criteria unchanged from Window 1. Actively encouraging project development on MCFN Treaty lands without distinguishing the formal Treaty holder from non-treaty First Nations and other Indigenous organizations diminishes MCFN's Treaty rights. Failing to prioritize the formal Treaty holder invites proponents to play First Nations against one another, which already occurred during LT1.

The IESO must restrict economic participation incentives to partnerships with the formal land title Treaty holder.

The LT2 RFP design also fails to require mandatory Indigenous engagement on “municipal lands”. Currently, the process only requires an Indigenous Support Confirmation when a proponent sites a project physically on a First Nation reserve. Exempting municipal lands from direct IESO Indigenous engagement mandates falsely tells proponents that First Nations hold no rights across their wider Treaty and traditional territories. The IESO must require mandatory early engagement with the Treaty holder for all projects proposed on “municipal lands”. Furthermore, when proponents submit attestations to a municipality claiming they have engaged local Indigenous communities to secure a Municipal Support Confirmation, the IESO leaves verification entirely to the municipality. Both the municipality and the IESO must independently verify proponent attestations before any proposal advances.

MCFN also rejects the IESO's position that it merely purchases electricity rather than approving projects. Energy projects cannot proceed without IESO contracts and permission, so the IESO cannot offload its consultation duties onto municipalities or project proponents. Just as the IESO is incorporating mandatory Indigenous Engagement and Participation Plans into transmission procurements like the Toronto Third Line, the IESO must mandate an Indigenous Engagement and Participation Plan for LT2 that is built on a negotiated consultation process with MCFN, and secures consultation capacity funding, equity participation structures, and community benefits.

MCFN's Treaty lands and traditional territory overlap with 10 of the IESO's 21 regional planning areas, placing a heavier engagement burden on MCFN than on any other First Nation in Ontario. Despite more than a year of formal requests, the IESO provides zero capacity funding for MCFN to participate in these processes. This inappropriately places burden on MCFN to review technical procurement designs and attend consultations entirely at our own administrative and financial expense for IESO projects.

Finally, MCFN requires clear accountability and transparency regarding how the IESO handles our feedback. Following the process commitments the IESO made on September 4, 2026, MCFN expects a formal written response explaining specifically who receives this feedback, what decision making process governs each item, and how the IESO will resolve these issues before posting the final LT2 Window 2 RFPs and Contracts in early 2027.