

Feedback Form

Long-Term 2 RFP – February 24, 2026

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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 February 24th 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 March 13, 2026.

Procurement Timelines

LT2 Window 2 Proposal Submission

Do you have any feedback on the proposed timing for proposal submission?

FirstLight Energy supports the proposed timing for LT2 Window 2 proposal submission. Namely, that the proposal submission deadline for LT2 (e-2) will take place during Q2 2027 and that proposal submission for LT2 (c-2) will happen “in quick succession” after LT2 (e-2) proposals have been submitted.

FirstLight also supports the IESO’s proposal to move the LT2 Window 2 MCOB from 2031 to 2032 accordingly.

Related to the above, FirstLight submits that the IESO should issue the LT2 (e-2) Request for Proposals as far in advance of the proposal submission deadline as possible. This will help to provide a clear signal – including associated guidance, documentation, forms, etc. – to proponents, municipalities, Indigenous communities and other stakeholders well before bids are due.

General Framework

Contract Term

Do you have any feedback on the proposed contract term for repowering under the Long-Term RFP?

Under the Long-Term RFP, for new-build projects, FirstLight submits that the contract term length should be 30 years. This reflects the IESO’s acknowledgment and understanding that renewable energy assets have a useful life of up to 30 years with good operations and maintenance practices. This would contribute to IESO resource adequacy over the long term and reduce future IESO administrative burden. For comparison, British Columbia and Quebec both offer 30-year contracts for renewable energy projects, reflecting the maturation of renewable energy technologies, operational excellence and valuing their full useful life. A 30-year contract term length would also help to lower project prices for ratepayers by spreading costs over a longer period.

Resource Eligibility

Repowering

Do you have any feedback on the proposed eligibility requirements and definition of repowering?

FirstLight supports IESO procurements and policies that preserve the value of existing renewable facilities that ratepayers have already invested in, while also investing in critical net-new assets – the Ontario electricity system needs both to support near-term reliability.

FirstLight strongly oppose the IESO’s proposed eligibility requirement that existing facilities be required to first complete a Medium-Term RFP 5-year contract in order to be eligible to submit a repowering

project proposal via a Long-Term RFP. We strongly submit that this should not be a requirement for repowering project proposals. Proponents with existing facilities should have as much flexibility and optionality as possible to determine the optimal next steps and pathway – based on project economics, market dynamics, etc. – for their facility at the end of its contract, including:

- Repowering via Long-Term RFP contract for up to 30 years.
- Life extension continued operations via 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.

Target and Competition Mechanics

Do you have any feedback on the proposed competition mechanism for new and repowered facilities?

FirstLight submits that the energy target for new-build projects and the energy target for repowering projects should be fully separate and exclusive from one another. In other words, repowering projects should not take away from or reduce the energy target for new-build projects, and new-build projects should not take away from or reduce the energy target for repowering projects. This would result in a greater number of project proposals, which would support the IESO's need to procure significant amounts of low-cost energy resources to maintain reliability in the critical 2029 to 2035 period.

The IESO should reserve its discretion to procure above the energy target for new-build projects and to procure above the energy target for repowering projects. These two separate targets should not be linked or interdependent in any way, therefore preserving the IESO's optionality to procure above either or both targets.

Mandatory Requirements

Do you have information to share with the IESO to further inform the mandatory requirements framework as it relates to repowering of existing facilities? E.g., in the areas of exemptions, municipal and Indigenous support resolutions requirements, and agricultural land and other environmental permitting.

For Medium-Term RFP flexible contracts of any length (5-15 years): Where a proponent performs work on their facility to extend its operating life and potentially increase its output, and continue its operations for 5-15 years, we submit that no new mandatory requirements should be imposed. In other words, Medium-Term RFP life-extension continued operations projects should not trigger new permitting or other requirements and should continue to be exempt from new municipal and Indigenous support resolutions requirements, agricultural land and other environmental permitting requirements.

These facilities previously obtained all necessary approvals and continue to meet their operational requirements. These facilities have remaining useful life to continue providing critical electrical energy to the IESO-Controlled Grid and should be utilized to the maximum extent.

For Long-Term RFP repowering projects: FirstLight understands that Municipal and Indigenous Support Resolution requirements are expected to remain. With respect to policy regarding agricultural land and other environmental permitting for repowering projects, FirstLight 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 wanting 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.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Deliverability Guidance

FirstLight is very concerned about the two-pronged approach for updated deliverability guidance proposed by the IESO during its February 24, 2026 webinar. The IESO proposed: 1) that updated deliverability guidance would be published very soon to show any “new room” with respect to transmission capacity; and 2) that it would not publish any updated deliverability guidance until after LLT RFP contracts are awarded in Q1 2027.

We submit that this is inadequate, and too long of a time and information gap between #1 and #2 above for the sector as it conducts pre-development work and prepares bids for LT2 (e-2).

We strongly recommend that the IESO plan, communicate and execute a three-pronged approach for providing updated deliverability guidance to the sector over the next 12 months:

1. Publish updated deliverability guidance soon to show any additional transmission capacity since the last update.
2. By July or August 2026, rapidly publish updated deliverability guidance as soon as possible after LT2 (e-1) and (c-1) contracts are awarded, to reflect the outcomes of these procurements. This will help to address the critical information gap for the sector as it conducts development activities and prepares bids for LT2 (e-2) and (c-2).
3. After LLT RFP contracts are awarded in Q1 2027, rapidly publish updated deliverability guidance, reflecting the outcomes of this procurement.

Further to the above recommendations, the IESO should consider committing to publishing updated deliverability guidance in a regular, ongoing, cadenced manner – for example, every four to six months. This would provide clarity, confidence and certainty to the sector, especially as procurements and other

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

LT2 Window 2 (and beyond) Contract Term

Per our comments above, FirstLight submits that the contract term length for LT2 Window 2 (and beyond) projects – both new-build and repowering projects – should be 30 years. This reflects the IESO’s acknowledgment and understanding that these assets have a useful life of up to 30 years with good operations and maintenance practices. For comparison, British Columbia and Quebec both offer 30-year contracts for renewable energy projects, reflecting the maturation of renewable energy technologies, operational excellence and valuing their full useful life. A 30-year contract term length would also help to lower project prices for ratepayers by spreading costs over a longer period.