

Feedback Form

Long-Term 2 RFP – February 24, 2026

Feedback Provided by:

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Date: **March 13, 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 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?

OPG supports extending the proposal submission deadlines to Q2 2027 for LT2(e-2) and soon after for LT2(c-2). This will allow sufficient time for project development once updated Window 2 transmission deliverability guidance is available, while avoiding the need for developers to obtain Municipal Support Resolutions during the 2026 municipal election period.

OPG recommends that a minimum of 6 months is required between release of final LT2 Window 2 transmission deliverability guidance and the proposal submission deadline to allow adequate time for improved project definition and engagement with the IESO.

General Framework

Contract Term

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

Resource Eligibility

Repowering

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

Eligibility Requirements

- To be eligible to participate in the LT2 Repowering RFP, the IESO requires that an existing electricity generating facility that as of May 1, 2032, will have completed both an IESO (or OEFC) contract with term ≥ 20 years, and at least one full MT contract term ≥ 5 years.
- The IESO is proposing to base eligibility for Repowering on facilities coming close to/having reached the end of their useful life to help ensure value for facilities that ratepayers have already paid for and are not prematurely being repowered. However, these requirements as stated may render certain end-of-life facilities ineligible, thus reducing value to the electricity system and benefit to the ratepayer, specifically, the exclusion of facilities that never held a 20-year contract and or 5-year MT contract with the IESO/OPA/OEFC.
- Ontario has thermal stations that have been in operation for more than 25 years, but have not held a 20-year IESO contract and/or an MT contract. OPG believes that these thermal stations

meet the intent of IESO's Repowering framework, but are disallowed from participating under current eligibility requirements.

Recommendations:

OPG supports the IESO in their aim to repower end-of-life facilities and recommends the following:

- Establish a pathway for facilities to pursue repowering even if they have not completed a \geq 20-year IESO/OEFC and/or \geq 5-year MT contract.
- Any facility that has operated for 25 years or more, or is at its economic end-of-life, regardless of historic contracts status, be eligible to participate in the LT2 Repowering RFP. This will allow these end-of-life facilities to support the IESO's intent to prevent premature repowering and bring additional value to the ratepayer.
- Revise "IESO contract" to "IESO/OPA contracts" to reflect the organizational change of the time, with no change to scope or function of the assumed contracts.

Target and Competition Mechanics

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

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.

Mandatory Municipal Resolution

Municipal and Indigenous Support Resolution requirements are expected to remain for Repowered facilities under the LT2 RFP. OPG appreciates the IESO's intent to ensure strong municipal engagement, however, we believe that requiring a municipal council resolution for projects that maintain the same footprint as an existing facility - while improving efficiency and performance - creates unnecessary administrative burden for both proponents and municipalities.

When a project does not expand its physical footprint or alter its land-use characteristics, it does not introduce new municipal impacts. These projects would function as upgrades to existing, already-approved infrastructure.

We encourage the IESO to consider an exemption for such cases, allowing municipalities to focus their attention on proposals that introduce new or expanded land-use considerations.

Clean Electricity Regulations

Beginning 2035, the federal Clean Electricity Regulation (CER) will impose carbon emissions limits on thermal plants that generate electricity combusting fossil fuels. Given the potential for change in provincial/federal climate legislation and regulation over such a long period (i.e. 20 years), the IESO should consider the inclusion of termination mechanisms and/or off-ramps for thermal facilities in the repowering framework to allow proponents the flexibility to exit the contract if legislative changes greatly impact operating conditions and/or cost of running a thermal facility. Equipment changes a thermal facility undertakes to meet regulatory emissions requirements should also be eligible for Repowering, i.e. more efficient/lower emitting gas turbine.

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.