

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?

The OWA has strongly recommended that the due date for proposal submission for the LLT-e procurement be extended to December 31st 2026 (rather than October 1st as proposed during the last LLT engagement session), noting, among other considerations, that the reality of municipal elections in August 2026 and the fact that Crown land access (MNR) has yet to be made available compromise the ability of proponents to bring forward projects to compete in the LLT-e procurement within the IESO's proposed timeline.

We appreciate the co-dependencies in timing successive energy and capacity procurements with respect to the determination of available connection capacity. We note as well that energy projects secured through LLT will make more efficient use of the grid due to the higher capacity factor and contribution to system reliability of hydroelectric resources. As such, should the IESO require more time following this assessment of LLT-e projects and remaining/planned connection capacity availability, the IESO may have to adjust the proposed timing for proposal submission for LT2 Window 2.

General Framework

Contract Term

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

The contract term for repowered (redeveloped) hydroelectric projects should be forty (40) years, consistent with their longer lifespan following redevelopment (in essence, a new facility).

Resource Eligibility

Repowering

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

During the engagement session, IESO staff acknowledged that the current design is premised to date on wind and solar facilities. At the session, we noted that:

- Both the SHP and NHP have been designed to support sustaining capital investments but will not support redevelopment; and
- The LLT-e will not include redevelopments.

In response, the IESO indicated that:

- The OWA is correct in its observation that, to date, the draft design does not address hydro repowering;
- The design will be improved over the coming months and the IESO already has some initial concepts regarding how the repowering of hydroelectric facilities can be included within this process;
- The general approach presented will require some deviations to address the uniqueness of hydroelectric facilities; and
- The IESO will work with hydroelectric facility owners in the near term to develop an approach within the LT2 framework.

The OWA very much appreciates the IESO's clarification in this regard and looks forward to our direct engagement.

We note that the IEP strongly supports the refurbishment of existing hydroelectric facilities to continue their important contribution to the province's energy, reliability and security objectives:

"Ontario's government has made it a priority to expand and refurbish the province's existing hydroelectric fleet...hydroelectric projects are multi-generational assets – providing decades of non-emitting electricity, system flexibility, and economic benefits..."

To help advance the inclusion of repowered hydroelectric facilities within the LT2-Window 2 procurement, our initial recommendations are as follows:

- Consistent with the approach to LLT-e, establish a separate stream within LT2 for repowered hydroelectric facilities;
- Provide contract terms that are consistent with the renewed lifespan of repowered hydroelectric facilities (e.g. 40 years); and
- Adopt the existing definition of "redeveloped station" within O. Reg 124/02 with respect to repowering of hydroelectric facilities¹.

The OWA looks forward to discussing these initial recommendations and LT2 design features to ensure that repowered hydroelectric facilities can be procured through this process.

Target and Competition Mechanics

¹ "redeveloped station" means a station at which improvements that include a substantially replaced power house and associated physical infrastructure for the conveyance and utilization of water

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

We note that the IESO believes that having new builds compete with repowered facilities will result in the most cost-effective outcomes for ratepayers, yet again observe that LLT-e will not include repowered hydroelectric facilities and that neither the SHP nor NHP will support repowering.

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.

The OWA supports the requirement for Municipal and Indigenous Support Resolutions for hydroelectric projects that require an Environmental Assessment pursuant to the OWA Class Environmental Assessment for Waterpower Projects (2024).

General Comments/Feedback

Do you have additional feedback to share with the IESO?

The OWA would appreciate the opportunity to discuss the approach to the inclusion of repowered hydroelectric facilities within this procurement process at the IESO's earliest convenience.