

Stakeholder Feedback and IESO Response

Long-Term 2 RFP – Window 2 [LT2 (window 2) RFP] – April 20, 2026

Following the February 24, 2026, LT2 RFP stakeholder engagement webinar, the Independent Electricity System Operator (IESO) invited stakeholders to provide feedback on the LT2 (window 2) RFP Proposal Submission Timelines, Contract Term, Eligibility Requirements for Repowering, Procurement Targets, and Mandatory Requirements such as permitting requirements. The IESO is currently in the design stage of the LT2 RFP. Feedback is posted on the Long-Term RFP [engagement webpage](#). Please reference the feedback forms for specific feedback as the information below is provided in summary.

Note on Feedback Summary and IESO Response

The IESO appreciates the feedback received from stakeholders and communities. The tables set out below respond to the feedback received and are organized by topic.

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A) LT2 Window 2 Proposal Submission Timelines

Stakeholders expressed general support for the IESO’s proposal to delay the proposal submission deadline for Window 2 until Q2 of 2027, after deliverability guidance has been made available. Stakeholders were also supportive of moving the milestone date for commercial operation (MCO) from 2031 to 2032. Specific feedback is highlighted below.

Feedback / Common Themes	IESO Response
<p>The IESO should consider a proposal submission deadline no earlier than Q3 in 2027:</p> <ul style="list-style-type: none"> many stakeholders indicated that the one year of meteorological data collection needed for wind and solar projects may need to start in Fall 2026 due to potential regulatory amendments by the Ministry of Natural Resources to the Public Lands Act 	<p>While the IESO is sure the proposal submission deadline for the LT2(c-2) RFP and LT2(e-2) RFP will not be in advance of Q2 2027, the IESO is still determining the specific proposal submission deadline and will consider factors such as the time needed for prospective proponents to collect meteorological data at potential project sites when setting the applicable deadline.</p>
<p>The IESO should provide a minimum of six (6) months between the final LT2 deliverability guidance and the proposal submission deadline:</p> <ul style="list-style-type: none"> some stakeholders indicated that a six-month window would allow for meaningful engagement with stakeholders after project siting was better informed and a sufficient level of project definition had been achieved 	<p>The IESO acknowledges that developers require adequate time after receiving deliverability guidance to identify suitable project locations and effectively engage all relevant stakeholders. To support this process, the IESO aims to issue deliverability guidance to prospective proponents at the earliest feasible opportunity, recognizing the time needed for engagement prior to proposal submission deadline.</p> <p>To support LT2 Window 2, the IESO is releasing deliverability guidance in 3 phases, the first of which will be released at the April 21 Engagement. Releasing deliverability guidance as more information becomes available should help proponents make informed siting and engagement decisions throughout 2026.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should utilize the longer proposed timelines to work with government to streamline and clarify the permitting process for repowering projects</p> <ul style="list-style-type: none"> some stakeholders indicated that the additional time could be used by the IESO to host joint webinars with relevant government agencies and ministries to better clarify on the permitting process for repowering projects and provide policy guidance on recent relevant legislation (i.e. Species Conservation Act, 2025) 	<p>The IESO will be discussing repowering with the Ministry of Energy and Mines on the LT2(c-2) RFP and LT2(e-2) RFP in the coming months. As part of this work, the IESO will outline the potential impacts of existing legislation and permitting processes on repowering projects, with the objective of informing how these policies can be applied in a repowering context.</p> <p>To further support prospective proponents, the IESO also intends to host joint webinars in the coming months with the Ministry of Natural Resources, the Ministry of the Environment, Conservation and Parks as well as other relevant ministries to provide greater clarity on the permitting requirements for repowering projects.</p>
<p>The proposal submission deadline for the LT2(c-2) RFP should follow in quick succession after the LT2(e-2) RFP</p>	<p>The IESO is currently developing timelines for the LT2(c-2) RFP and expects that its proposal submission deadline will follow the LT2(e-1) deadline in quick succession, similar to the proposal submission deadlines of the LT2(c-1) and LT2(e-1) RFPs.</p>

B) Contract Term

Stakeholders generally agreed that the proposed contract term for repowered facilities should be the same as that for new-build facilities. While some stakeholders were supportive of the proposed 20-year contract term under the LT2 RFP, most were opposed and sought longer contract terms. Specific feedback is provided below.

Feedback / Common Themes	IESO Response
<p data-bbox="181 405 800 478">The IESO should provide a longer term (i.e. 25 years, 30 years) for the LT2 RFP:</p> <ul data-bbox="181 499 800 989" style="list-style-type: none"><li data-bbox="181 499 800 646">• Many stakeholders indicated that the contract term for renewable energy assets should be 30 years as those assets typically have a useful life of 30 years<li data-bbox="181 653 800 835">• Some stakeholders cited that other jurisdictions (i.e. British Columbia, Quebec) are offering, or have recently offered, contract terms of 30 years for similar projects<li data-bbox="181 842 800 989">• Few stakeholders indicated that longer contract terms would allow the IESO to procure better prices as project costs would be amortized over a longer period	<p data-bbox="800 405 1515 821">The IESO recognizes that contract term length is an important consideration for project financing and overall project economics. At the same time, the IESO must balance price competitiveness with the need to maintain flexibility to adapt to evolving system needs, policy objectives, and market conditions over the long term. A 20-year contract term provides the IESO with greater ability to respond to changes in technology costs, demand outlooks, and supply mix requirements, while limiting long-term risk to Ontario ratepayers.</p> <p data-bbox="800 842 1515 1178">The contract term outlined in the LT2 Directive reflects this balance, informed by prior procurement experience, system planning needs, and risk considerations. While renewable assets may have longer technical lives, the duration for which contracted revenue is required to support financing can vary and may be addressed through refinancing, contract renewal opportunities, or participation in market mechanisms following contract expiry.</p>

Feedback / Common Themes	IESO Response
<p>For Medium Term RFPs (MT RFPs), the IESO should explore contract terms that are longer than five (5) years:</p> <ul style="list-style-type: none"> Some stakeholders noted that extending the duration of MT RFP contracts could provide a practical option for facilities that require moderate investment but do not need partial or full repowering, as a longer term (e.g., 10 years) would allow them to remain cost competitive while undertaking the necessary upgrades. Few stakeholders indicated that extending the duration to 10 years or more would provide existing facilities with a longer runway of time to bid into multiple future LT RFPs 	<p>The IESO is open to the possibility of greater flexibility, including longer MT contract terms, where such changes better align with system needs and value for ratepayers. However, any modification to MT contract duration would require further discussion with the Government of Ontario and would be contingent on a revised Ministerial Directive.</p>
<p>The contract term for repowered hydroelectric facilities should be forty (40) years.</p>	<p>The IESO is open to considering a 40-year contract term for repowered hydroelectric facilities. To better assess the appropriateness of such a term and competitive implications, the IESO requests that stakeholders provide additional information and evidence explaining why a shorter contract term, such as twenty years, would be insufficient for these facilities.</p>

C) Resource Eligibility

Many stakeholders provided feedback on the proposed definition of repowering and were generally not supportive of the proposed requirement to obtain a Medium-Term RFP (MT RFP) Contract prior to participating in a repowering opportunity under the LT2 RFP, indicating that it was overly restrictive. Few stakeholders were supportive of the requirement to be contracted via an MT RFP and those who were indicated that such a requirement serves to maximize ratepayer value. Specific feedback is provided below.

Feedback / Common Themes	IESO Response
<p>The IESO should provide a pathway for facilities to undergo repowering even if they are not successful in the MT RFP process:</p> <ul style="list-style-type: none"> • Many stakeholders indicated that Proponents with existing facilities should be given as much flexibility and optionality as possible to determine their next steps based on project economics, market dynamics, etc. • Some stakeholders noted that the IESO should recognize that certain facilities may need to retire or be decommissioned without a repowering opportunity, as they may have no remaining useful life after their initial contract term and would require significant capital investment to continue operating; making a contract award under the MT RFP unlikely • Other stakeholders indicated that some facilities could face the risk of technical and operational obsolescence if future LT RFPs are delayed or cancelled • Few stakeholders of thermal facilities indicated that any facility that has operated for 25 years or more and is at end-of-life, should be eligible to participate in the LT2 RFP regardless of contract status 	<p>The IESO acknowledges stakeholder feedback regarding the need for flexibility for existing facilities that may not be successful in an MT RFP process but may still be viable candidates for repowering. The IESO also acknowledges that certain facilities—particularly those that have already operated for 25 years or more, have never had an IESO/OEFC contract, or that have concerns about their ability to continue operating beyond their existing contract terms—may face unique circumstances. Prospective proponents with such concerns (and who have not already done so) are encouraged to submit facility-specific feedback to the IESO and/or reach out to engagement@ieso.ca to arrange 1-on-1 meetings with the LT2 design team. The IESO remains open to considering outlier cases where alternate pathways or accommodations may be warranted.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should not require a facility to complete an MT Contract:</p> <ul style="list-style-type: none"> Some stakeholders indicated that if the IESO were to require a facility interested in repowering to enter an MT RFP Contract, then the IESO should provide opportunities for that facility to exit their MT RFP Contract early in order to participate in a repowering opportunity 	<p>The IESO is open to exploring whether partial completion of an MT contract term, rather than full completion, is appropriate to establish repowering eligibility. This approach could help manage the average facility age of the existing resource pool, while still maintaining a mechanism to incentivize getting the maximum useful life from existing facilities prior to repowering, ensuring optimal value for ratepayers and avoiding premature turnover of assets.</p> <p>The IESO will be providing an updated approach to the eligibility requirements for repowered facilities in window 2 of the LT2 RFP at its April 21, 2026, stakeholder engagement webinar.</p>

The IESO should provide technology-specific guidance or illustrative thresholds for what constitutes substantial replacement at a Facility

- Some stakeholders indicated that the current definition of ‘substantial replacement of energy-generating equipment’ is too vague and can lead to a risk of comparable projects being treated inconsistently
- Stakeholders also indicated that Independent Engineers should be utilized to provide an attestation to whether a facility requires repowering, if technology-specific guidance and/or thresholds are provided by the IESO

The IESO notes that, through prior engagement, several stakeholders have emphasized the importance of keeping the definition of repowering intentionally broad, allowing proponents to determine the most appropriate technical solutions for their specific facilities based on equipment condition, economics, and operational considerations.

Consistent with that feedback, the IESO remains of the view that prescribing technology-specific thresholds or equipment replacement requirements would be sub-optimal. Facilities differ materially by technology type, age, design, operating history, and site-specific constraints, making it unlikely that standardized criteria could be developed that would be appropriate across the board. It is also likely that firm requirements on equipment/infrastructure replacement would increase costs where the replacement of that equipment/infrastructure may not be necessary.

The IESO also notes that imposing specific replacement requirements would necessitate audit and verification mechanisms to confirm compliance, which would likely be administratively complex for both proponents and the IESO. The IESO seeks to avoid such requirements, particularly where they may not meaningfully improve outcomes for the system or ratepayers.

Accordingly, the IESO is of the position that the decision of what constitutes an optimal repowering approach for a given facility is best left to facility owners, supported by Independent Engineer certification, along with contract security and performance obligations over the new contract term.

At the same time, the IESO recognizes concerns regarding the potential for repowering projects with insufficient design rigor to compete unfairly with more robust proposals. To address these concerns, the IESO is open to exploring alternative, non-prescriptive safeguards, such as minimum imputed production factors informed by a facility’s historical output, or enhanced security requirements for repowering facilities, as potential tools to reinforce good engineering practice while preserving flexibility.

Feedback / Common Themes	IESO Response
<p>The IESO should revise the definition of repowering to include one of the following:</p> <ul style="list-style-type: none"> • Facilities that have completed a 20-year IESO or OEFC contract • Facilities that have not completed an IESO or OEFC contract but can demonstrate (e.g. via the certificate of an Independent Engineer) that the facility has reached the end of its useful life • Facilities that include an expansion and where the owner will make an investment in the existing facility that will extend the life of the existing facility by an additional 20 years to match the useful life of the expansion (i.e. where an existing 20 year contract has not been completed but the facility owner wants to expand the facility and role the entire new, expanded facility into the new 20 year contract) 	<p>As noted in the response above, the IESO intends to maintain a flexible and principle-based definition of repowering eligibility. At the same time, the IESO is open to alternate avenues in unique circumstances, including where certain existing facilities are demonstrably at end of life and would be unable to complete any additional term under an MT contract, or where facilities have never been subject to an IESO or OEFC contract but may nonetheless deliver value to ratepayers through a repowering project.</p> <p>In applying these principles, the IESO will need to strike an appropriate balance to avoid enabling facilities with remaining useful life to repower prematurely.</p> <p>The IESO will not be approving existing facilities that have operated less than 20 years to be rolled into expanded repowering projects.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should allow existing facilities that are physically adjacent with the same owner, operator and technology type to submit a single bid with staggered COD dates that are in accordance with the terms of their existing contracts.</p> <ul style="list-style-type: none"> Stakeholders indicated that under this construct only one of the adjacent facilities should be required to complete the requirement of having completed one MT RFP Contract Stakeholders emphasized that this design would maximize efficiencies for developers, allow for economies of scale for equipment supply and construction contracts, and provide savings for ratepayers through lower proposal prices. 	<p>The IESO acknowledges stakeholder feedback proposing that physically adjacent facilities with the same owner, operator, and technology type be permitted to submit a single bid with staggered CODs, aligned with the terms of their existing contracts. The IESO recognizes that such an approach could enable development efficiencies, economies of scale, and potentially lower costs for ratepayers.</p> <p>The IESO is open to exploring this concept in the future; however, further discussion is required to determine the appropriate eligibility criteria, aggregation rules, and conditions under which facilities could be combined, including how staged CODs would be treated and how existing contract completion requirements would apply to aggregated projects. Any such framework would need to preserve fairness across proponents and ensure alignment with the intent of repowering and procurement objectives.</p>
<p>The IESO should evaluate different repowering options that are dependent on the generation technology.</p>	<p>As stated above, the IESO does not intend to take a prescriptive or technology-specific stance on what precisely constitutes repowering for different generation types. Repowering strategies can vary widely depending on facility design, condition, and operating history, and these considerations are best assessed by proponents for their individual facilities.</p> <p>Accordingly, proponents can determine whatever reinvestment approach they believe is appropriate to enable their facilities to meet the performance obligations of a new LT2 contract, based on the contract capacity and imputed production factor they elect to propose, and at whatever price they choose to bid.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should clarify the eligibility requirements for new-build natural gas projects and repowered natural gas projects under the LT2 RFP.</p>	<p>The IESO acknowledges stakeholder feedback requesting clarification on eligibility requirements for new-build and repowered natural gas facilities under the LT2(c-2) RFP. The IESO is currently engaging with Government on the policy framework applicable to natural gas resources and will provide clarified eligibility requirements as soon as possible following those discussions.</p>
<p>Repowered hydroelectric facilities should be a separate stream within the LT2 RFP.</p>	<p>The IESO recognizes that hydroelectric facilities have distinct operating characteristics, asset lifecycles, and repowering considerations compared to other generation technologies.</p> <p>At this time, the IESO does not intend to establish a separate procurement stream for repowered hydroelectric facilities under the LT2 RFP. Maintaining a technology-agnostic procurement structure supports competition, administrative simplicity, and flexibility, while allowing proponents to propose repowering solutions that best meet contractual performance requirements.</p> <p>That said, the IESO remains open to considering whether technology-specific considerations, including those unique to hydroelectric repowering, warrant differentiated treatment. The IESO welcomes continued stakeholder feedback as it evaluates how best to balance flexibility, fairness, and value for ratepayers within the LT2 framework.</p>

Feedback / Common Themes	IESO Response
<p>For repowered hydroelectric facilities, the IESO should adopt the existing definition of 'redeveloped station' within O.Reg 124/02</p>	<p>The IESO notes that O. Reg. 124/02 defines a redeveloped station as follows:</p> <p>"redeveloped station" means a station at which improvements come into service after December 31, 2000, that include a substantially replaced power house and associated physical infrastructure for the conveyance and utilization of water.</p> <p>While the IESO recognizes that this definition provides a hydro-specific regulatory precedent, it was developed for a distinct contractual and regulatory context. For the purposes of the LT2 RFP, the IESO intends to maintain a broad, technology-agnostic repowering framework, rather than adopt prescriptive, technology-specific definitions that could constrain investment decisions or create unintended eligibility outcomes.</p>

D) Target and Competition Mechanics

Stakeholders provided mixed feedback on competition mechanics. While some stakeholders provided support for direct competition between new build and repowered facilities with a cap on repowered facilities informed by the available pool of existing assets, most did not. Specific feedback is provided below.

Feedback / Common Themes	IESO Response
<p>The IESO should not arbitrarily set a cap for the repowering target:</p> <ul style="list-style-type: none"> Many stakeholders suggested that any cap on Repowering Projects should be informed by direct engagement with existing facility operators to assess the feasibility of extending operations before undertaking major capital investments. They noted that it is difficult to predict how many facilities would pursue a repowering opportunity versus opting for a MT Contract. Few stakeholders indicated that a capped target could force some facilities to participate in the MT RFP, where they would still need to invest heavily in their facilities but could only amortize costs over a much shorter duration, thus leading to higher priced outcomes in the MT RFP. 	<p>The IESO notes stakeholder feedback regarding the use of a cap on repowering projects and wishes to clarify that the repowering target will not be set arbitrarily. For each procurement window, the repowering cap will be directly informed by the available pool of eligible existing facilities and the maximum level of concurrent outages that can be accommodated while maintaining system reliability.</p> <p>In particular, the repowering cap for any given LT2 window will reflect operational assessments regarding the ability to manage simultaneous construction and outage activity associated with repowering projects without compromising reliability. This approach ensures that repowering can proceed in an orderly manner while balancing system needs, deliverability risk, and value for ratepayers.</p>

The IESO should bifurcate the LT2 Energy Target into separate targets for new-build and repowered facilities:

- Many stakeholders indicated that repowered projects should not take away from or reduce the energy target for new build facilities
- Some stakeholders indicated that a bifurcation could result in a greater number of proposals, which in turn could lead to competitive outcomes that result in lower proposal prices

The IESO does not intend to bifurcate the LT2 energy target into separate targets for new-build and repowered facilities. Under the current proposed framework, repowering proposals will only be accepted where they represent cost-effective outcomes relative to new-build proposals and other repowering proposals, while also respecting reliability considerations.

Specifically, where sufficient deliverable new-build proposals are available to meet the new-build target, the IESO would only accept repowering proposals that are priced below the marginal accepted new-build proposal. In addition, the repowering cap for each window ensures that the IESO does not accept an amount of repowering capacity that would result in excessive concurrent outages during construction, which could jeopardize the reliability of the Ontario grid. Together, these mechanisms ensure that ratepayers do not overpay for repowering projects and that repowering happens in a staged fashion such that system reliability is maintained at all times.

Repowering proposals that are more expensive than comparable new-build proposals would only be accepted in circumstances where deliverable new-build supply is insufficient to meet the energy target. In such cases, higher-priced repowering would signal a genuine system reliance on existing resources, justifying the acceptance of higher prices to meet reliability needs. Importantly, repowering projects would not count toward satisfying the new-build target and therefore would not reduce opportunities for new-build facilities.

The IESO does not agree that bifurcating the LT2 energy target is likely to result in a greater number of proposals or lower proposal prices. The current integrated framework preserves competition across project types while ensuring the best possible value for ratepayers.

Feedback / Common Themes	IESO Response
<p>Under the capacity stream, the IESO should recognize and value the additional operating qualities of gas facilities (i.e. duration) and their dual role as an energy resource</p>	<p>The IESO acknowledges stakeholder feedback regarding the additional operating qualities of natural gas facilities, including dispatchability, duration, and their dual role as both capacity and energy resources.</p> <p>Under the LT2(c-1) RFP, the IESO recognized the value of these resources by providing rated criteria points for facilities that were capable of injecting continuously for periods of eight (8) hours or more. For the LT2(c-2) RFP, the IESO expects to take a similar approach. In addition, the IESO will continue to monitor system needs and market outcomes and may consider differentiated treatment of operating attributes in future procurements if warranted to ensure reliability and value for ratepayers.</p>

E) Mandatory Requirements

Stakeholders generally acknowledged that a new directive would be required for the IESO to grant any exemptions from mandatory requirements that applied under the previous LT2(e-1) RFP and LT2(c-1) RFP, and provided feedback on how those requirements could be modified. Specific feedback is provided below.

Feedback / Common Themes	IESO Response
<p>Repowering projects that maintain the same footprint as an existing facility, and do not include noise emissions above the level authorized by pre-existing approvals, should not be required to obtain a municipal support confirmation (MSC):</p> <ul style="list-style-type: none"> Many stakeholders indicated that requiring these facilities to obtain an MSC would create unnecessary administrative burden for both Proponents and Municipalities since these facilities would not introduce new municipal impacts Other stakeholders indicated that existing permits should be grandfathered when a project’s footprint or environmental impacts do not materially increase 	<p>The IESO acknowledges the significant regulatory complexity facing repowering projects and will share this stakeholder feedback in its upcoming discussions with Government. At this time, the IESO does not expect repowered facilities to be exempt from the requirement to obtain a municipal support confirmation.</p> <p>Similar to the LT2(c-1) and LT2(e-1) RFPs, any requirement to obtain a municipal support confirmation will be reflective of policy decisions made by the Ministry of Energy and Mines that are issued to the IESO in form of a Directive specific to the LT2(c-2) RFP and LT2(e-2) RFP.</p>
<p>Repowering projects should be exempt from agricultural land use policies or other environmental permitting policies:</p> <ul style="list-style-type: none"> Some stakeholders indicated that imposing new agricultural land use or permitting requirements (such as those from window 1 of the LT2 RFP) for existing facilities would limit the pool of potential repowering projects. 	<p>The IESO recognizes stakeholder concerns regarding the impact of agricultural land use policies on project siting for repowering projects, particularly for repowered ground-mounted solar facilities, and will convey this feedback with Government. However, any project siting restrictions arising from agricultural land use policies or other environmental permitting requirements reflect policy decisions established by the Ministry of Energy and Mines and may be similar to those under Window 1 of the LT2 RFP and applied consistently across new-build and repowered facilities. In this case, ground-mount solar projects would continue to have the option to participate under the MT RFP framework.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should consider allowing Proponents to reuse or amend existing environmental and permitting approvals as this could allow for the implementation of a fast-track or amendment process for Renewable Energy Applications (REAs), rather than a full application.</p> <ul style="list-style-type: none"> Some stakeholders indicated that Existing REAs should be reusable with as few changes as possible since going through the REA process could jeopardize the viability of repowering 	<p>The IESO acknowledges the significant regulatory complexity facing repowering projects and will share this stakeholder feedback in its upcoming discussions with Government. The IESO will be working with the Ministry of the Environment, Conservation and Parks to get a better understanding of how the current REA process applies to repowering projects. The IESO notes that it will be a government decision as to how to apply the REA framework to repowered facilities.</p>
<p>Medium Term RFPs should not trigger new permitting or other requirements, such as municipal support resolutions</p> <ul style="list-style-type: none"> Many stakeholders indicated that these projects are simply life extensions for projects that have previously obtained all necessary approvals and continue to meet their operational requirements 	<p>Consistent with the approach taken under the MT1 and MT2 RFPs, the IESO will continue to recommend to the Ministry that projects procured through future MT RFPs not be required to obtain municipal support resolutions. Contracts awarded under the MT RFPs are intended to provide projects with the financial certainty needed to continue operating for the duration of the MT contract term, including undertaking routine maintenance and, where necessary, minor refurbishment.</p>
<p>For a thermal facility, the IESO should consider the include termination mechanisms or off-ramps for thermal facilities in the repowering framework to allow Proponents the flexibility to exit the contract if legislative changes impact operating conditions and/or the cost of running a thermal facility.</p>	<p>In recognition of legislative impacts, such as those from Government of Canada’s Clean Electricity Regulations (CERs), the LT2(c-2) Contract is expected to contain a GHG Abatement Plan to address CERs similar to that included in section 2.14 of the LT2(c-1) Contract. These provisions can provide a Supplier with contractual off-ramps in the event that their facility is no longer able to meet its must-offer requirement due to CERs despite having taken commercially reasonable efforts.</p>
<p>For a thermal facility, the IESO should allow equipment changes undertaken to meet regulatory requirements (i.e. more efficient or lower emitting gas turbines) to be eligible under the repowering definition</p>	<p>The IESO is currently engaging with government on the policy framework applicable to thermal facilities and will provide clarified eligibility requirements as soon as possible following those discussions.</p>

Feedback / Common Themes	IESO Response
<p>For a repowered project, municipal support confirmations (MSCs) should be part of rated criteria and not a project requirement – as was the case under the LT1 RFP</p>	<p>The inclusion of municipal support confirmations (MSCs) as a mandatory RFP requirement is determined by the Ministry through the issuance of a directive to the IESO. Under the LT1 RFP, proponents were required to secure an MSC within 18 months of the Contract Date, with failure to do so constituting an event of default. While MSCs were not required at the time of proposal submission under the LT1 RFP, rated criteria points were only awarded where an MSC had already been obtained at that stage.</p> <p>To better empower local communities and reduce the risk of contracted projects defaulting, the approach used under LT1 was not carried forward into the LT2(c-1) RFP and LT2(e-1) RFP, under which, pursuant to Ministerial Direction, MSCs were instead required to be in place at the time of proposal submission.</p>
<p>The IESO should improve instructions on its Prescribed Form: Evidence of Municipal Support to ensure that those unfamiliar with the IESO process can understand the completion requirements, for example using more widely understood civic address or lot and concession references as opposed to PINs for properties comprising a Project Site.</p>	<p>The IESO is open to suggestions for making the Prescribed Form: Evidence of Municipal Support more widely understood and encourages feedback on changes that can better support municipalities in preparing the form.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should provide additional requirements for projects located in Unorganized Territories, community views could be solicited from local service boards that are responsible for roads and fire safety in these communities.</p>	<p>Under the LT2(c-1) RFP and LT2(e-1) RFP, per Ministerial Direction, no municipal support confirmation was required for projects proposing to locate on Unincorporated Territory. However, Proponents of these projects are still subject to prescribed public engagement requirements under applicable environmental assessment processes administered by government agencies such as the Ministry of Environment, Conservation and Parks (MECP). For questions related to environmental assessment processes you can contact the MECP at enviropemissions@ontario.ca</p> <p>In addition to these MECP requirements, the IESO is open to discussing additional requirements for projects located in Unorganized Territories with government and encourages local service boards to provide feedback to the IESO and participate in the upcoming LT2 RFP Community Engagement series.</p>
<p>The IESO should adopt a process that provides public information for projects being proposed on Crown Land and solicit feedback from those that may be affected by such projects.</p>	<p>As set out in the Environmental Bill of Rights, 1993, all renewable energy projects that are proposed on Crown Land are required to be posted on the Environmental Registry of Ontario for public review and comment. Stakeholders interested in learning about projects that may be located on Crown land, or interested in providing feedback on such projects are encouraged to search the registry or email the Ministry of Natural Resources support team at MNRRenewableenergysupport@ontario.ca.</p>

F) Deliverability

Many stakeholders suggested that the IESO’s proposed approach of initially providing guidance in the near term and then again after Long Lead Time RFP (LLT RFP) Contracts are awarded is too far of a spread and that Proponents should be informed more often. Specific feedback is cited below.

Feedback / Common Themes	IESO Response
<p>The IESO should implement the following three-phased model for deliverability:</p> <ul style="list-style-type: none"> • Immediately, the IESO should provide deliverability information so that Proponents can get a current view of system constraints • Later this year (i.e. Q3), the IESO should share updated transmission capacities which show the outcomes from window 1 of the LT2 RFP • Six months before proposal submission, or one (1) month after Long Lead Time (LLT) Contracts are awarded, the IESO should publish final deliverability guidance which includes results from the LLT RFP. 	<p>The IESO recognizes the importance of providing Proponents with the most recent deliverability guidance, incorporating recent IESO procurement outcomes and planning assessments, to support informed project siting decisions. To that end, the IESO will present an updated approach to sharing deliverability guidance for the LT2(c-2) RFP and LT2(e-2) RFP at the upcoming April 21 Stakeholder Engagement Webinar.</p>
<p>The IESO should consider committing to publishing deliverability guidance in a regular, ongoing, cadenced manner (i.e. every 4 to 6 months)</p> <ul style="list-style-type: none"> • Many stakeholders suggested that on-going guidance would provide clarity and better confidence to Proponents • Some stakeholders also suggested that the IESO should consider committing to service standard of publishing updated deliverability guidance no later than one (1) month after contracts are awarded by the IESO for a generation procurement 	<p>The IESO appreciates this feedback. Deliverability guidance is intended to provide open and transparent information to all prospective proponents regarding transmission capacity availability across the province. To develop accurate and reliable guidance, the IESO’s Transmission Planning teams undertake a series of studies following each procurement to assess system security constraints and reevaluate available transmission capacity. As the system is in a constant state of change it would be difficult to standardize the provision of guidance knowing that different approaches may be needed for each subsequent procurement. As a result, publishing deliverability guidance one month after contract award is not feasible at this time. However, the IESO will discuss this feedback internally to see what can be done to enhance clarity and confidence to Proponents.</p>

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Existing facilities should not need to pass a deliverability test as their underlying interconnection agreements are in force and in effect	The IESO notes that the treatment of deliverability for repowering projects is still under consideration. However, at a minimum, repowering projects that propose an expansion in capacity or an increase in output capability would likely be required to undergo deliverability testing to confirm there are no upstream system constraints to deliverability and system reliability can be maintained.

G) General Comments

Specific feedback is summarized below.

Feedback / Common Themes	IESO Response
The IESO should provide 12 to 18 months of advance notice for MT3 submissions in order to facilitate the appropriate planning time with operators.	The IESO continues to evaluate timelines for the MT3 RFP and future windows of the LT2 RFP. In establishing proposal submission deadlines and contract award targets, the IESO must balance system adequacy requirements, available transmission capacity, and the ability to provide prospective proponents with timely and accurate deliverability guidance. Notwithstanding these considerations, the IESO remains committed to maintaining a cadenced approach to both MT and LT procurements and will provide updated timelines following receipt of a ministerial directive for the LLT RFP.
The IESO should provide a larger pricing advantage (5% to 10%) for proposals that include Indigenous community participation.	<p>Similar to the LT2(c-1) RFP and LT2(e-1) RFP, the IESO expects to maintain the use of rated criteria to award points to projects with Indigenous equity participation and local Indigenous community participation. Rated criteria categories for the LT2(c-2) RFP and LT2(e-2) RFP are still being determined and will be conveyed to prospective proponents in the coming months.</p> <p>Under the LT2(c-1) RFP and LT2(e-1) RFP, the Evaluated Proposal Price of a Proposal that was able to earn all Rated Criteria points associated with Indigenous Participation Level and Local Indigenous Community Participation (as each such term was defined in the LT2(c-1) RFP and LT2(e-1) RFP) would have been at least 8-10% lower than the bid Proposal Price.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should provide clarity on whether early COD bonus mechanisms will be applicable under window 2 of the LT2 RFP and whether they will be applicable to new-build and/or repowered facilities.</p>	<p>The inclusion of early operation incentives for new-build facilities under the LT2(c-2) RFP and LT2(e-2) RFP is still being evaluated by the IESO, and will be informed by system adequacy needs shared in the 2026 Annual Planning Outlook that will need to be updated to reflect recent procurement outcomes, such as those from the LT2(c-1) RFP and LT2(e-1) RFP.</p> <p>At this time the IESO is not considering early operational incentives for repowered facilities.</p>
<p>As part of its team member experience requirements, the IESO should expand its definition of a qualifying project under the LT2(c-2) RFP and LT2(e-2) RFP to include jurisdictions outside of North America, similar to the Long Lead Time (LLT) RFP.</p>	<p>The IESO is currently not considering the addition of jurisdictions outside of Canada and the United States to the list jurisdictions in which a qualifying project can be used to demonstrate team member experience for proponents in the LT2(c-2) RFP and LT2(e-2) RFP.</p> <p>Under the IESO’s Long Lead Time (LLT) RFP, the list of eligible jurisdictions for qualifying projects was expanded only for the capacity stream, which was available to long duration energy storage (LDES) resources. This expansion reflected the introduction of relatively new technologies that may have limited development experience in the North American context. Prospective proponents intending to submit proposals involving relatively new technologies that may have limited development context in North America are encouraged to engage with the IESO directly.</p>