Feedback Form

Long-Term 2 RFP – August 20, 2026

Feedback Provided by:

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Date: September 4, 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**

x☐ **YES - Comfortable to publish to the IESO web page**

Following the August 20th, 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 September 4, 2026.**

Repowering

Do you have feedback on the proposed requirements?

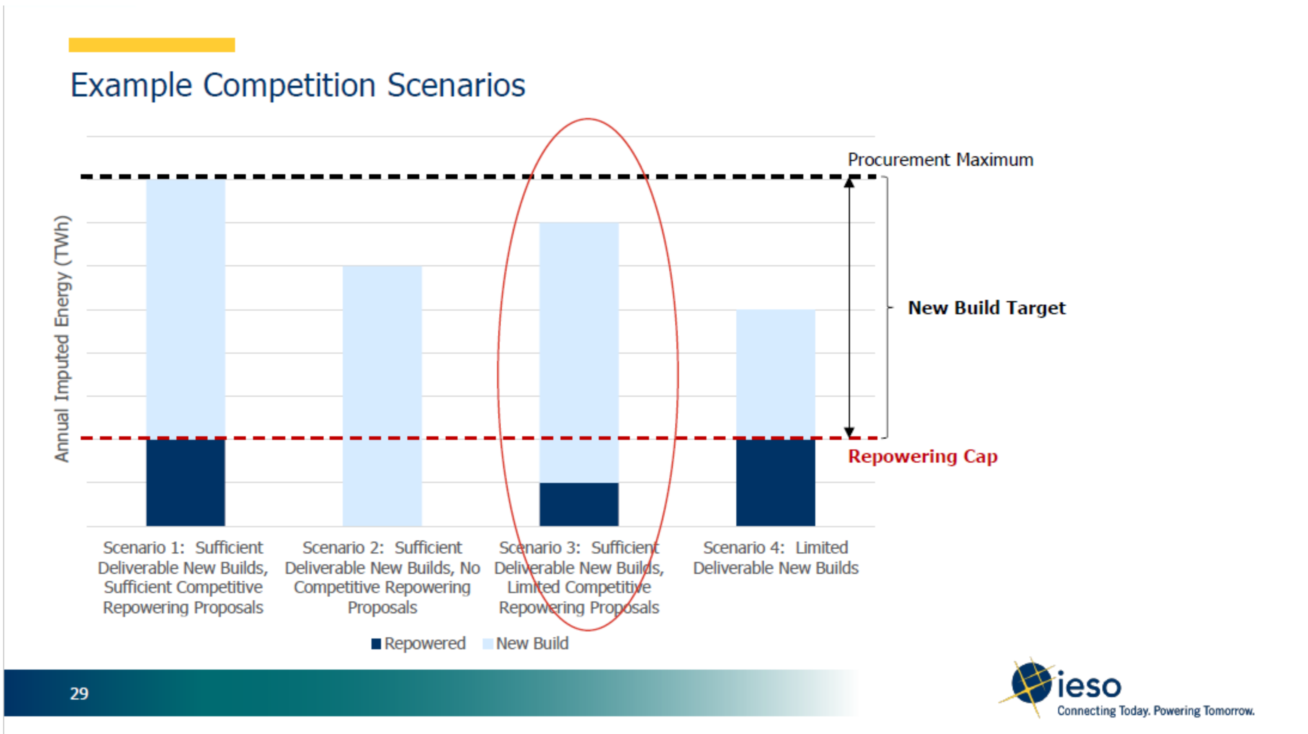
- Repowering: Requirement for Commercial Operation:

- Repowering: Competition Mechanics:

Allowing New Build Proposals to compete for unutilized Repowering Cap Capacity

We participated in the IESO webinar on August 20th and support the Competition Mechanics presented on slide 28.

However, the Example Competition Scenarios (Slide 29) would potentially leave see the procurement Maximum TWh target under subscribed because there are not competitive repowering projects to fill the repowering target, as shown in Scenario 3 below.



If the IESO has a procurement Maximum TWh target (because the province needs the energy) where there are not any remaining competitive Repowering Proposals, we would encourage the IESO to accept New Build Proposals until the Procurement Maximum is achieved, even if the Repowering Cap is not fully subscribed.

Federal Crown Land

Please inform the IESO if you intend to site your project on federal Crown land.

Disclosure of Additional Pricing Information for Window 1

Do you have feedback the IESO should consider when determining whether to release price curves for LT2 Window 1?

Ensuring Transparency and Fairness Across Successful and Unsuccessful Bids.

We recommend revealing all prices and imputed energy submitted and attributed to each proponent's bid. While this is a level of transparency beyond what the IESO has suggested, each proponent has already agreed to disclose their bid prices if they were to be selected by the IESO.

Currently, there is an uneven information dynamic related to disclosure of bidding information. Unsuccessful bidders can see specific information that would otherwise be confidential related to Price and Imputed Production, giving them insight into winning bids.

If unsuccessful bidders can have access to this information about successful bidders, then the reverse should also be available for successful bidders.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Locational Rated Criteria Points

We believe it's important to provide locational rated criteria points based on system need to inform where projects are proposed and ranked during the procurement. Projects located closer to load centres, including those on the distribution system, reduce the need for transmission upgrades and losses created in the system, especially during peak demand times. These benefits are not currently captured in the RFP's Proposal Evaluation and therefore drive results where new generation may require additional transmission investment to serve load.

Removing the absolute cap on Canadian Content Penalties

Section 2.16 of the Draft LT2e-2 Contract outline the Canadian Content Requirements including the CCR Liquidated Damages.

We support the CCR Liquidated Damages, but believe they should be uncapped or tied to a $/MW. Currently the $5,000,000 cap may be inconsequential to the total capex for larger projects as compared to the benefit associated with being a CCR Supplier (up to 3% on a Proponents bid price). Without meaningful penalties these rules will not achieve the policy objectives of encouraging local investment and labor use.

DARTA Mechanism

We support the IESO's decision to retain the DARTA mechanism in the LT2 Window 2 contract. Retention of the mechanism reflects recognition that day-ahead to real-time (DART) settlement risk cannot be meaningfully managed by variable generation (VG) proponents, and we appreciate the IESO's ongoing consideration of concerns raised by the sector.

We do not believe the lending market is yet comfortable with the 85% DARTA coverage under the LT2e window 1 contracts, let alone decreasing the coverage to 60%. We submit that this proposal does not adequately address the risks that the sector has outlined in detail in several previous submissions to the IESO. We recommend maintaining the 85% coverage and submit that this would be more reasonable and appropriate to balance the IESO's objectives with the risk allocation principles that make VG projects financeable and cost-effective for Ontario ratepayers.