

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**
☒ **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:

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?

General Comments/Feedback

Do you have additional feedback to share with the IESO?

E-PPA Design: DA to RT Adjustments

OPG appreciates the IESO's commitment to addressing stakeholder feedback by retaining DARTA, and taking a balanced stance between ratepayer exposure and risk to the proponent.

DA-RT exposure is the result of differences between forecasted and actual variable generation and load. The sources of the risk are inherent to the operation of the electricity market, and operational experience alone cannot mitigate the risk.

OPG recommends the IESO consider how risk will be priced into proponent bid prices with the reduction to a 60% protection, and how it will impact final LT2 clearing price and thus ratepayer cost, to ensure Ontario procures energy in a cost-effective way, with balanced allocation of risk and operational realities.

Repowering Criteria

OPG supports the repowering framework to extend the life of existing assets, leveraging existing facilities that are already in operation. The broad definition will allow for proponent flexibility to

derive extended value out of existing facilities for the benefit of ratepayers. Given the evolving landscape of energy demand and technology options, it is important that the framework not limit any technically or economically feasible options. OPG encourages the IESO to provide further guidance on the repowering definitions in what constitutes an “upgrade” versus a “redevelopment” to enable proponents and the Independent Engineers to distinguish between the projects.

Capacity Procurement Design

Please see OPG’s July 10 feedback for further details on Effective Load Carrying Capacity’s importance in energy procurement in the Ontario energy system.

The IESO is currently conducting analysis on the relative capacity value of storage and non-storage resources and is weighing alternatives to a single capacity target.

OPG cautions against the splitting of the capacity procurement into storage and non-storage streams without consideration for Effective load Carrying Capacity (ELCC). The introduction of two streams does not negate the diminishing return of increasing BESS penetration on the grid and does not fully assess a project’s grid value.

OPG recommends the IESO consider the ELCC as part of the project assessment criteria with adequate weighting that reflects the actual added grid value, not just the resource’s nameplate capacity. This ensures a diversified grid that is reliable and resilient.

Conclusion

OPG appreciates the IESO addressing stakeholder concerns and feedback in developing the LT2 W2 procurement framework. Specifically with regards to maintaining a level of DARTA protection in general and for not proceeding with the barring of proponents not in good standing. The IESO’s efforts to incorporate stakeholder feedback to ensure competitive bidding will ensure Ontario’s electricity system remains reliable, cost-effective, and adaptable to future needs. OPG looks forward to continued collaboration with the IESO on this and future engagements.