Long-Term 2 RFP – August 20, 2026

Feedback Provided by:

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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.

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Repowering

Do you have feedback on the proposed requirements?

- Repowering: Requirement for Commercial Operation:

- Repowering: Competition Mechanics:

Our comments here are about procurement flexibility, a firm new build target, and the effect of ranking repowering and new build in the same offer stack.

1. Window 1 showed what inflexibility costs.

On the IESO's own reporting at the August 20 webinar, the Window 1 energy stream closed at roughly 79 percent of its energy target. Thirteen contracts were executed. One of them was wind, at 200 MW out of 1,115 MW of total awarded capacity. Wind all but fell out of the procurement.

That was not for want of proposals. Wind was proposed, and the IESO's own reporting shows the great majority of proposed wind production was in the Northwest, where there is capacity to take it. So the window closed short of the IESO's own target with viable, competitively priced proposals in front of it, and those proposals were not awarded. The province did not get the energy. The proponents, including Nation proponents who had spent their own money to get to a bid, got nothing.

Nothing in the procurement rules required that outcome. It was a choice about flexibility, and it is the outcome we would ask the IESO to avoid repeating in Window 2, where repowering now competes for the same space.

2. Use the discretion that already exists, and widen it.

Section 4.6 of the draft RFP already allows the IESO, in its discretion, to reapply the process and add further proposals to the Offer List where a Selected Proponent fails to enter into a contract. We would ask the IESO to state plainly that it intends to use that discretion, and to extend it to two further situations: where a window closes below its target energy, and where contracted capacity falls away later through withdrawal, termination, or failure to reach commercial operation. In each case the next ranked viable proposal on the same offer stack should be capable of being awarded, rather than the capacity sitting unprocured until a window two or three years out.

3. Publish a firm new build target and a firm repowering cap, and do not move them afterwards.

The draft RFP leaves both the New Build Target Energy and the Repowering Cap blank. A new build proponent cannot judge whether it is worth bidding without them.

That judgment is sharper for a First Nation, which is committing community money to development at risk rather than drawing on a corporate development budget. We would ask that both figures be published in the final RFP, that the new build target operate as a floor rather than a ceiling, and that it not be reduced after proposals are submitted.

4. Repowering and new build are not competing on equal terms.

Under the draft, a repowering proposal keeps the connection point of the existing facility, and it comes with an existing site, existing access, and in most cases existing approvals. A new build pays for all of that. Ranking the two on a single offer stack by price alone therefore favours repowering for reasons that have little to do with the merit of the project or the value it delivers to the system. If the IESO's intention is to secure new supply, and to see more of it owned by First Nations, the mechanics should reflect that a repowering megawatt and a new build megawatt are not the same thing.

5. Where the IESO fills a shortfall, give priority to Indigenous owned and Indigenous controlled projects.

If discretion is exercised to award additional capacity, we would ask that majority Indigenous owned projects, and projects where the Nation holds actual control rather than an economic interest alone, be given priority in that award. That is consistent with the objectives the IESO has set for this procurement.

6. Repowering on Treaty land.

Where a repowering project is located on Treaty land, the Indigenous participation expectations that apply to new build should apply equally to the repowered facility. A facility that was built decades ago without the involvement of the Nation whose Treaty land it sits on should not carry that history forward into a new contract term unchanged. Repowering is a natural point to correct that, and the competition mechanics should make room for it.

Federal Crown Land

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

Our answer to the question asked, and then a request about the language used in it.

Wabigoon Lake Ojibway Nation is developing generation within our Treaty 3 territory near Dryden, Ontario. Site control work is complete for private land. Some parcels do fall within land the federal or provincial government treats as Crown land or public land.

On the language. We would ask the IESO to reconsider the terms Crown land, public land, and land administered by the Ministry of Natural Resources. Those terms describe the government's administrative interest in a parcel. They do not describe the parcel. The land in question is Treaty land. Our Nation entered into Treaty 3 and holds rights and responsibilities on that land that pre-date and survive any administrative interest the Crown records against it.

What we are asking for is small and specific:

1. In the RFP, the prescribed forms, and the community facing materials, describe these sites as Treaty lands, and name the applicable Treaty where the site is known.

2. Add a field for the applicable Treaty alongside the land tenure fields in the prescribed forms, so that proponents provide it consistently.

3. Where a statutory name or a defined term has to stay because it carries legal effect, keep it and place the Treaty framing beside it. For example, Treaty lands administered by the Province as public land under the Public Lands Act.

What we are not asking for is a change to the legal definitions in the contract, or to the name of a Ministry form. We understand why those exist.

Why it matters to us. This question, as written, asks a First Nation to declare its own Treaty land as Crown land in order to take part in a provincial procurement. That is not a neutral request, and it sets the tone for everything that follows. Changing the wording costs the IESO nothing and would be noticed and appreciated across our region. A short memorandum from our Nation on this point is attached to this submission.

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?

Yes. We support the release of price curves.

Community led proponents do not have the market intelligence that large developers carry in house. We are asked to price a proposal, and in our case to commit our own capital to the equity, without the pricing context that a repeat bidder accumulates over several procurements. Publishing price curves narrows that gap. It also lets a Chief and Council make a decision on a real range rather than on an advisor's estimate, which matters when the Nation is the owner and is carrying the risk rather than receiving a fee.

If the IESO has a concern about signalling future prices, we would rather see the curves released with a clear statement of their limits than withheld.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

1. Recognize Indigenous participation above the threshold, not just at it.

As we understand the rated criteria, Indigenous participation is scored all or nothing. A project with 50.1 percent Indigenous economic interest receives the full award and a project below that receives none, with no additional recognition for anything above 50.1 percent. The practical effect is that very different arrangements score identically.

Consider two proposals. In the first, a Nation holds 50.1 percent as a passive carried interest, funded by the developer, with no seats that carry decision rights and no role in management or operations. In the second, a Nation holds a larger share, controls the project, sits as managing partner, funds its own equity, and takes on operations and maintenance. Under the current framework both score the same. The second proposal is doing far more of what the program is meant to encourage, and the evaluation gives it no reason to.

We would ask the IESO to consider:

a. A graduated or tiered score above 50.1 percent, so that a Nation that goes further is recognized for it.

b. Recognition of control and governance separately from percentage, for example a majority of board seats that carry real decision rights, the Nation as managing partner, and Nation control over major decisions.

c. Recognition where the Nation funds its own equity, rather than holding a carried, deferred, or developer financed interest. These are not the same commitment and should not score the same.

d. Recognition where the Nation holds operations, maintenance, or asset management, since that is where long term jobs and capability stay in the community.

e. Guardrails so that 50.1 percent on paper cannot be structured in a way that leaves the Nation without control in practice.

2. Terminology.

Please see our response under Federal Crown Land, and the attached memorandum, on describing project sites as Treaty lands rather than Crown land or land administered by the Ministry of Natural Resources.

3. Engagement timelines.

The feedback window following the July 8, 2026 community session closed on July 22, and this window closes on September 4. Those are short periods for a Nation that has to bring a matter to Council, and in some cases to its membership, before it can answer. Where the IESO is seeking community feedback specifically, a longer window, or a standing invitation to respond, would produce better input than the current schedule allows.

We would welcome a conversation on any of the above, and we can provide further detail on our ownership structure and our capacity work if that would help the IESO's consideration.