Feedback Form

Long-Term 2 RFP (Window 2) – October 14, 2026

Feedback Provided by:

Name: Ritesh Talati

Title: Sr. Analyst

Organization: Atura Power

Email: [redacted]

Date: November 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 October 14th, Long-Term 2 RFP Window 2 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 October 30, 2026.**

Rated Criteria

Locational Criteria

- Do you have feedback on the proposed locational scoring framework, including the treatment of different zones, technology types, and repowering projects?

  Atura supports the IESO's approach of aligning locational rated criteria with Deliverability Guidance, so as to make the most efficient use of available transmission capability. Where transmission capability is limited, Atura encourages the IESO to ensure the scoring framework recognizes the resource attributes that deliver the greatest system value per MW, including energy output and contribution during peak demand periods.

Non-Wires Alternatives (NWA)

- Do you have feedback on the proposed NWA opportunities, including eligibility, scoring, and the approach to assigning points?

  Atura supports evaluation criteria that recognize NWAs capable of deferring transmission investments.

  Where different technologies can address the same local transmission need, the IESO should clarify how the associated NWA opportunities interact across the energy and capacity streams.

  For Kirkland Lake, the identified 50 MW NWA need can be met by solar or natural gas. How will qualifying proposals across the two streams be evaluated against this shared requirement, and how will procurement in one stream affect the availability of NWA points in the other?

  For Belleville, the identified NWA amounts are 10 MW for solar and 60 MW for BESS. Could solar capacity procured above the 10 MW amount reduce the BESS NWA requirement and the capacity eligible for the NWA rated-criteria point, or will the two technology-specific amounts be assessed independently?

Agricultural Land Considerations

- Do you have feedback on the proposed treatment of prime agricultural areas, agrivoltaics, and potential agricultural exemptions?

  No comments at this stage.

LT2(e-2) Contract Design

Non-Performance Charges (NPCs)

- Do you have feedback on the proposed NPC changes, including technology-specific thresholds and the treatment of monthly production factors?

  The presentation indicates that the IESO will take steps to mitigate bidding behaviour associated with monthly imputed production factors. What measures are being considered, and when does the IESO intend to communicate them? These measures should be clearly defined before proposal submission, as they may affect proposal development and evaluation.

Evolving Value of Energy Storage

- Do you have feedback on how the evolving reliability and capacity value of energy storage should be reflected in LT2 evaluation, scoring, or procurement design?

  Consistent with Atura's capacity-accreditation feedback, the evolving reliability value of energy storage should be considered through the IESO's MRI methodology and used to inform the LT2 Window 2 procurement MW target and the reliability attributes to be secured. The procurement mechanism should remain relatively simple. Where particular attributes are required, separate procurement streams based on those attributes may be simpler to administer than a single stream with rated criteria, while allowing any resource capable of meeting the applicable requirements to compete.

  The IESO should share the resulting accreditation values and their proposed application to LT2 Window 2 early enough for stakeholders to review and provide input on the procurement approach.

Repowering

- Do you have feedback on the proposed Independent Engineer certification requirements?

  No comments at this stage.

- Do you have feedback on the proposed treatment of repowering projects within LT2 competition and evaluation processes?

  No comments at this stage.

Regulation Service Readiness

- Do you have feedback on the proposal to require regulation-service readiness for LT2 projects?

  Atura supports including regulation readiness as a rated criterion, recognizing the growing need for regulation services and the efficiencies of incorporating this capability during development rather than retrofitting. However, regulation services are contracted separately, and proponents would be committing to readiness without a regulation-services contract at

the time of bidding. Readiness should therefore remain optional unless the IESO is considering offering a regulation-services contract alongside an LT2 award.

- Do you have feedback on the proposed technical requirements and any associated cost, schedule, or implementation impacts?

  No comments at this stage.

Deliverability and System Performance

- Do you have feedback on the proposed deliverability methodology, including regional congestion assumptions and transparency of information available to proponents?

  Section 9 of the Connection Guidance document, indicates that the evaluation-stage Deliverability Test may consider scenarios, methods and forecasts different from those underlying the Preliminary Connection Guidance, potentially producing different results. Will those differences be identified and communicated before proposal submission so proponents can account for them in project siting, sizing and proposal preparation?

- Do you have feedback on the proposed treatment of short-circuit strength, minimum system strength requirements, and emerging technologies such as grid-forming inverter-based resources?

  The IESO should clarify the technical information proponents must submit and the criteria it will use to assess proposed MSCR capability and grid-stability solutions during evaluation-stage deliverability testing, including which IBR limitations may be relaxed and whether circuit-level bright-line limits remain applicable.

- Do you have feedback on the proposed circuit availability maps and any additional information that would support project siting and proposal development?

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Atura has the following additional clarification questions/comments:

1. Can the IESO clarify whether capacity procured to meet locational needs, including the NWA opportunities for 50 MW of natural gas in Kirkland Lake and 60 MW of BESS in Belleville will count toward the planned approximately 400 MW capacity-stream procurement target or be incremental to it.

2. If gas-fired generation is needed to be procured through LT2 Window 2, the 2032 target COD is unlikely to be achievable for this technology given current OEM lead times for gas turbines. The IESO should recognize that gas-fired projects may not realistically reach in-service under Window 2 and consider a later target COD, more consistent with a 2034/2035 timeframe.