Feedback Form

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

Feedback Provided by:

Name: Shelby Dockendorff

Title: Advisor, Government Affairs

Organization: Boralex

Email: [redacted]

Date: October 30, 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?

Boralex supports locational rated criteria that steers projects toward areas where they deliver the most value for the system. We appreciate the IESO for identifying this information early in the development of Window 2 and ask that the IESO continue this for future rounds.

Non-Wires Alternatives (NWA)

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

While Boralex does support the addition of non-wires alternatives (NWA) points in theory, we caution that a single rated-criteria point will likely not offset the cost disadvantage faced by smaller projects in targeted non-wires alternative areas. The IESO should consider increasing the scoring value or introducing an additional mechanism that recognizes demonstrable transmission or distribution deferral benefits. Without a more material incentive, the framework may not attract projects of the size and location needed to address the identified system requirement.

Agricultural Land Considerations

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

Boralex suggests that the IESO let municipalities be in control of their planning processes in respect to energy projects when determining the eligibility of projects on agricultural land. Blanket prescriptive agricultural requirements may limit locally appropriate solutions.

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?

Boralex supports technology specific non-performance thresholds, since wind and solar resources vary differently from month to month and year to year and a single threshold does not reflect that. We do ask for clarification from the IESO that curtailment, Force Majeure and grid-based unavailability would be excluded from the calculation.

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?

The IESO should provide timely clarity on how MRI will be treated for capacity accreditation and the resulting implications for BESS projects in this procurement window. If this cannot be resolved in time, we ask that further consultation be established to ensure developers have sufficient certainty and lead time to plan for LT2 Window 3.

Repowering

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

Repowering has been a leading market in the United States over the past ten years and independent engineer certification is not typically required. However, if required, a prescriptive form is not traditional and unlikely to be accepted as a standard form across the industry; independent engineers will most likely attempt to modify the forms and include disclaimers, so the acceptability of a prescribed form will be problematic. As a long-standing industry practice, if an independent engineering opinion is required, is a Statement of Conformity. This is an opinion from an independent engineer that - in short - based upon the design certification, remaining useful life and operations and maintenance plan, that the turbine(s) are reasonably expected to remain a reliable resource for the defined term. We would recommend that the prescribed Independent Engineer certificate be replaced with an industry-standard Statement of Conformity.

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

Regulation Service Readiness

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

Regulation-service readiness may create additional equipment, programming, communications and commissioning costs that will place upward pressure on LT2 bid prices. Before making readiness mandatory or using it as a rated criterion, the IESO should clearly identify the minimum technical capabilities, whether the obligation is limited to readiness or includes actual service delivery, and how the requirement will affect existing versus new resources. The IESO should also consider whether fixed readiness costs disproportionately affect smaller projects.

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

Deliverability and System Performance

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

Boralex asks the IESO to adopt a standard connection assumption for transmission-connected projects, so that all proposals are priced on the same basis. Connection cost is currently estimated differently by each proponent, depends on station configuration rather than project merit, and cannot be verified at the time of bid. As a result, proposals are not compared on a like-for-lie basis.

We recommend that any transmission line connection be assumed to require a three-breaker ring bus. Where a project can connect more cheaply than the standard assumption, the savings should be returned to the IESO so that there is an ultimate win for the ratepayers.

Alternatively, transmission connection costs could be removed from the bid price and added after contract award, based on the transmitter's estimate and subject to IESO review. Either approach would create a level playing field which we believe is key to ensure the IESO is reviewing projects based on the project merit instead of the station configuration.

- 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 minimum system-strength and short-circuit assumptions that will be applied during deliverability assessment, including whether grid-forming capability will be mandatory or recognized as a mitigation measure. Proponents should be permitted to identify technical solutions in their proposals—such as grid-forming controls, synchronous condensers or equipment capable of operating at lower short-circuit ratios—and to incorporate those solutions into their bid configuration and price. The methodology should also explain how interactions among clustered inverter-based resources affect upgrade requirements and how cost responsibility will be assigned where one project's technical characteristics contribute to requirements imposed on another project.

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

Boralex welcomes the circuit availability maps. To be useful for siting decisions, these maps should show available capacity in MW by circuit and station rather than only qualitative categories; identify the locational rated criteria zones and NWA areas on the same map; include short-circuit ration indicators state the date and assumptions used; and be updated at least once before the proposal deadline.

General Comments/Feedback

Do you have additional feedback to share with the IESO?