Feedback Form

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

Feedback Provided by:

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Date: Oct 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**
- x **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?

Brookfield Renewable N.A. appreciates the opportunity to provide feedback.

The IESO is currently proposing to exclude existing facilities from obtaining rated criteria points related to Location. We disagree with this proposal as it could significantly disadvantage existing facilities for no obvious benefit.

In the Energy stream, the rated criteria presented in slide 11 of the Oct 14 presentation could grant a total of 11 points (Solar could potentially be awarded some Non-wires alternative points but it is limited to two circuits). As proposed, existing facilities could receive a maximum of 9 out 11 points, whereas a new facility could receive a maximum of 11 out 11 points. This represents close to a 10% disadvantage in the offer price evaluation for existing facilities.

New facilities inherently carry construction, cost, permitting, and social license risks. These risks can translate into delays and cost overrun. In contrast, existing facilities, while facing many of the same uncertainties, have the experience and local relationships to mitigate them to complete the project on time. The IESO should not overly favor new facilities and forego the certainty of existing projects.

In cases where a new facility and an existing facility are both located in the same region where Locational rated criteria points would be awarded, this disadvantage would be even more significant. New and existing facilities should primarily compete on price to maximize RFP outcome and affordability for the rate-payers. In this context, new and existing facilities should be eligible for the same rated criteria points.

Finally, we note that existing facilities would not be required to pass the deliverability test if their offered MW were equal or lower than their existing contract value. We support this mechanism, which also offers flexibility to proponents to offer higher MWs. If a proponent with an existing facility wishes to submit a bid that exceed their existing nameplate, then only the incremental (additional) capacity in excess of the existing nameplate should be subject to the deliverability test.

Non-Wires Alternatives (NWA)

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

Agricultural Land Considerations

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

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?

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?

Repowering

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

- 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?

- 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?

- 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?

- 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?