Feedback Form

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

Feedback Provided by:

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Date: October 30th, 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?

  The proposed locational rated criteria, as currently structured, do not appear sufficient to influence development decisions or meaningfully increase the likelihood that projects will be proposed in the planning regions where the IESO has identified the greatest system needs. If locational points represent only a small portion of the overall evaluation, proponents may continue to prioritize sites with lower development costs, fewer constraints, and less stakeholder engagement requirements even where those sites are less aligned with provincial or regional needs.

  The IESO should provide a more robust locational signal. This could include materially increasing the weighting assigned to locational criteria and/or establishing region-specific procurement targets, carve-outs, or minimum commitments for priority planning regions. A targeted mechanism would help level the playing field for projects in planning regions where development may be more complex or costly while providing proponents with sufficient confidence to invest in site control, interconnection work, and early-stage development (southern Ontario, for example, will require proponents to obtain an MSR, require significant stakeholder engagement including hosting open houses, incur greater land costs, introduce layout complexity due to the number of receptors and smaller parcel sizes, and introduce greater environmental complexity when compared to Northern Ontario projects).

Non-Wires Alternatives (NWA)

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

  The proposed NWA rated criteria, as currently structured, does not appear to be sufficient to incent proponents to develop projects in the identified NWA areas. Projects in these locations may face higher development costs, additional technical requirements, greater interconnection complexity, or increased construction risk. If NWA points represent only a modest portion of the overall evaluation, they are unlikely to offset these disadvantages or materially influence siting and investment decisions.

  The IESO should provide a stronger and more certain incentive for eligible NWA projects. This could include materially increasing the points available for these specific locations to offset greater development complexity.

Agricultural Land Considerations

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

Horizon continues to advocate for the land rights of Ontario citizens. If a willing private landowner signs a contract with another private entity, then both parties have agreed to the terms of the contract, regardless of what type of agricultural area the land is considered. Ultimately, the requirement for an MSR will supersede agricultural exemptions as the local council does not have to provide an MSR if they feel the use of the land for a generation project is not warranted. The agricultural requirements create unnecessary and redundant administrative burden that is limiting competitive tension in the LT2 procurement.

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?

  A simple way to ensure there is no attempt at gamesmanship with monthly production factors is to require a wind or solar energy yield assessment completed by a registered Professional Engineer in Ontario be submitted with each proposal (with varying P-Q alternates requiring variants in a report).

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?

  Providing some form of scoring benefit to hybrid proposals (wind, solar, hydro, plus storage) would help ensure that all procured generation is dispatchable to an extent. Additionally, specific guidance or incentives for solutions within planning regions could help ensure that the correct solution is procured through the LT2 procurement.

Repowering

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

  Not at this time

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

  Not at this time

Regulation Service Readiness

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

  Horizon is supportive of requiring regulation-service readiness for LT2 projects, as this capability can provide additional operational flexibility and system value. However, the IESO should establish clear, detailed, and objective guidelines so proponents understand the required

technical capabilities, performance standards, testing and verification processes, communications and control requirements, and the point in the development or operating schedule at which compliance must be demonstrated. The guidelines should also clearly distinguish between being regulation-service ready and any future obligation to register, qualify, or provide the service. Providing these requirements early and applying them consistently will allow proponents to accurately assess design, equipment, cost, and schedule implications and avoid uncertainty during project development and contract implementation.

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

  Any proposed requirements and implementation dates must be known well in advance of the RFP submission date to ensure proponents are able to adequately consider the fulsome impacts of the requirements.

Deliverability and System Performance

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

  N/A

- 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?

  IESO should reach out to OEMs to confirm directly with equipment manufacturers whether these requirements are reasonable, can be met, and are cost effective to implement.

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

  The more information that can be released earlier, the better. For example, many proponents were anticipating the Wawa-Timmins corridor to be suitable for development. Now the deliverability guidance document indicates that connections will not be allowed on this line. Valuable time, effort, money, and engagement was spent anticipating this build-out. This seems like a decision that could have been made and passed along to developers well in advance of the document release to ensure focus was placed on areas of the province where connections will be allowed.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

The IESO should consider implementing more robust locational criteria or carve-outs. Presently, each additional point is worth a 1.67% reduction in a proponent's price when compared with other proponent submissions. The benefit of siting projects in Southern Ontario, wind in Northern Ontario, or targeting the Belleville / Kirkland Lake are unlikely to overcome areas of the province with material financial advantages (cost of land control, limited stakeholder engagement requirements, no MSR required). This will likely result in the same areas being targeted with the same technology types for window 2.