Feedback Form

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

Feedback Provided by:

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Date: October 28, 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?

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?

Northland appreciates the IESO's continued engagement on the design of LT2 Window 2 and supports efforts to better align procurement outcomes with identified reliability and transmission system needs.

Northland supports the introduction of Non-Wires Alternative (NWA) and locational rated criteria. Locational signals can improve procurement efficiency by directing investment to areas where generation can defer or avoid transmission investments, relieve congestion, and address localized reliability needs. However, the proposed locational criteria within the Energy stream that awards points exclusively to non-solar projects in Northern Ontario appears inconsistent with the IESO's technology-neutral procurement principles. Similarly, in the case of the Kirkland NWA, where the IESO has identified solar and natural gas as potential solutions, the sequencing of the RFPs, with Energy proceeding Capacity, excludes natural gas from competing with solar to meet that need. **At a minimum, natural gas-fired projects that are incentivized to develop their project to serve this need, should be awarded the Rated Criteria point in the Capacity RFP, regardless of whether this need has been previously met via the Energy RFP.**

More fundamentally, running the Energy RFP first and then applying rated criteria that could allow solar projects to satisfy an identified need before natural gas can compete in the Capacity RFP cuts against the Government of Ontario's technology-agnostic approach to meeting system needs. Through sequencing and rated criteria, the current design effectively favours solar over natural gas as an NWA solution, rather than allowing technologies to compete on their system value. **Northland recommends that the IESO consider changes to the structuring and sequencing of the**

RFPs so that all eligible technologies can compete on equal footing to address identified needs, with selection based on the system value each resource provides.

Northland appreciates the IESO's signalled willingness to revisit the treatment of repowering projects under the Location and NWA rated criteria. Existing facilities that are already contributing to local reliability should not be placed at a competitive disadvantage relative to greenfield development. Yes, eligibility for locational and NWA rated criteria will not influence the already-made citing decisions of repowered assets, but it will ensure a level playing field against potential new projects. This is important, as disadvantaging existing resources could lead to a failure to secure a repowering contract, ultimately leading to the retirement of the asset; Thus, exacerbating the very reliability need the NWA Rated Criteria is looking to address. **It stands to reason that repowering projects should remain eligible for the same Location and NWA rated criteria benefits as new projects.** More broadly, no aspect of the procurement design should favour new generation over repowering opportunities. The utilization of existing sites and infrastructure should be prioritized wherever possible given the associated cost savings, reduced environmental impacts, shorter development timelines, and established community acceptance.

Northland also encourages the IESO to continue **exploring whether planned transmission reinforcements with expected in-service dates close to the LT2 Window 2 assumptions can be reflected in deliverability assessments where appropriate**. Recognizing forthcoming committed transmission capacity can help ensure the procurement does not unnecessarily foreclose cost-effective projects in areas expected to experience significant increases in transfer capability shortly after the LT2 Window 2 commercial operation date assumptions. One such instance of this misalignment is the "Phase 1" transmission upgrades committed to in the recently finalized North of Sudbury Bulk Transmission Plan. These upgrades will significantly increase deliverability in the area, but due to their estimated 2033 COD narrowly missing the Milestone COD cutoff of 2032, they are not included in the deliverability assessment, despite being known and committed upgrades.

With respect to the proposed removal of the connection cost exceedance mechanism, the removal of this safeguard should be accompanied by a **clear commitment from Hydro One to provide proponents with timely, accurate, and sufficiently detailed connection cost estimates well in advance of the bid submission deadline.** Proponents must have confidence that material changes in connection costs will not arise after bids are submitted, particularly where such costs can materially affect project economics and bid competitiveness.

With respect to how the evolving value of energy storage should be reflected in the Window 2 Capacity RFP, we support the IESO's efforts to modernize capacity accreditation and ensure that accreditation values appropriately reflect the marginal reliability contribution of different technologies as Ontario's supply mix evolves. An accreditation framework that accurately measures reliability value is essential to ensuring the IESO procures and relies upon resources that can effectively meet Ontario's reliability needs. Failure to do so risks procuring capacity that does not deliver the reliability benefits assumed in planning and procurement processes – a costly error.

We believe that the outcomes of the selected capacity accreditation process (from the associated engagement) should directly inform future procurement design and

evaluation, including LT2 Window 2, to ensure procurement outcomes remain aligned with system reliability objectives.