Feedback Form

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

Feedback Provided by:

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Organization: Ontario Rivers Alliance

Email: [redacted]

Date: 26 October 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.**

The Ontario Rivers Alliance (ORA) recommends that the Independent Electricity System Operator (IESO) hold every resource in the Long-Term 2 (LT2) Window 2 procurement to the same test of performance, measurement and disclosure, and that no resource, whether hydropower, nuclear or natural gas, be given a protected lane at the expense of Ontario ratepayers.

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-Solar Points in the North:

The rated criteria rule allots extra points that help a proposal rank higher. Under the draft LT2(e-2) Request For Proposal (RFP), proposals in the North earn two locational points only if they are "*Non-solar projects only*".[1] The IESO's reason is that "*There's limited room in the North due to the volume of projects received in LT2 Window 1*",[1] and it wants the remaining room "*going to technologies with higher output*".[2]

ORA supports wind power, which produces more than solar in a northern winter. The rated criteria rule, however, does not measure output. It awards the points to a technology label. New northern hydroelectric carries that label, and nothing in the draft RFP tests how much water flow (hydropower's fuel) it will have in a dry year or a low-flow season. The IESO's own North of Sudbury Bulk Plan says the region's fleet shows "*large differences between installed hydroelectric capability and the amount of generation that can be depended upon in all hours of the day and under all system conditions*".[3]

A developer at the session said that, while he was not "*crazy about a pro-wind approach in the North because it sort of throws away the technology agnostic, you know, signal for the procurement*", "*I guess I can kind of accept that*".[2] He urged the IESO to open the points to more regions. The IESO replied: "*Look, totally fair point*", and said it was "*very happy to take this back*" to its transmission engineers "*and reconsider broadening the scope of these criteria points*".[2] Later in the session, the IESO said it remains technology agnostic in who may take part, but "*we are not needs agnostic*".[2] ORA agrees that need should govern. Need is measured in output, not in technology type.

ORA Recommendation 1: That the northern locational points be awarded on expected output verified by the IESO, not on technology type.

ORA Recommendation 2: That, if the IESO keeps the non-solar rule, every hydroelectric proposal claiming the northern points have its expected output tested against climate-adjusted water flows before the points are awarded.

Non-Wires Alternatives (NWA)

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

A Rated Criteria Point Reserved for Natural Gas:

A non-wires alternative is a local resource that meets a grid need in place of new transmission. The draft RFP awards one point to proposals that meet any of four such needs. At Sault Ste. Marie, the 95

MW need can be met only by "*Natural Gas*", and repowered facilities are eligible. At Kirkland Lake, the 50 MW need is open to "*Solar or Natural Gas*".[1]

On 31 August, ORA asked that "*no rated criterion, environmental attribute, clean energy credit or duration-related criterion confer an evaluation advantage on an emitting resource, whether natural gas or reservoir hydroelectricity*" (ORA Recommendation 12).[4] The draft now does the reverse at two sites. In the Window 1 capacity procurement, all three contracts, 640 MW in total, went to battery energy storage systems (BESS).[5] Environmental Defence Canada (EDC) reported that "*31 of the 32 non-storage proposals in Window 1 were gas*".[6] Storage won every capacity contract in that open competition. A point that only gas can earn decides the Sault Ste. Marie need before a single proposal is opened.

ORA Recommendation 3: That the IESO award no rated criteria point to natural gas, whether new build or repowered, in LT2 Window 2.

ORA Recommendation 4: That the Sault Ste. Marie non-wires need be opened to BESS and other non-emitting resources.

Agricultural Land Considerations

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

ORA supports agrivoltaics, which keep land in farming while it hosts solar generation. ORA notes that the agricultural land exemptions for agrivoltaics and for repowering are among the items that "*require further direction from government*";[1] see General Comments.

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 IESO's Own Finding: A Number the Bidder Chooses Can Be Gamed:

An imputed production factor is the share of its capacity that a facility declares it will produce. The bidder chooses it, the payment is calculated from it, and the non-performance charge, the penalty for falling short, is measured against it. The IESO's review of Window 1 found: "*It is possible to set imputed monthly production factors to values that are not reflective of the actual capability*".[1] It found that "*a small number of Proposals do appear to have taken this approach*", which "*could lead to either the IESO paying a higher $/MWh price for a given resource than the bid price would imply or impacting competition dynamics*".[1]

ORA made this point on 31 August (ORA Recommendations 5 and 8): the payment and the penalty rest on numbers the proponent picks. The IESO now agrees in principle.

Solar Tightened but Hydroelectric Untested:

The IESO's fix for annual overstatement rests on "*a statistical analysis using historical production and curtailment data of our existing solar and wind fleet*".[2] The result is in Exhibit F of the 9 October draft

contract. A project is charged only when it falls short of its own target by more than a set margin. The shortfall allowed before any charge is "*0.10*" for a solar facility and "*0.20*" for every facility that is not solar.[7] The IESO cut the margin for solar from 20 percent to 10 percent, but left hydropower at 20 percent. Hydropower's own variability was not tested.

The IESO describes hydroelectric two ways. Its public web page tells Ontarians that "*Nuclear and run-of-the-river hydro plants generate a constant, steady supply of electricity - 24 hours a day, 7 days a week*".[8] Its 2026 Annual Planning Outlook (APO) capacity study, in its analysis of surplus power, "*assumes all hydroelectric output is baseload*".[9] If hydropower is that steady, it can carry solar's 10 percent margin. If its output varies with water flow, as the North of Sudbury Bulk Plan says,[3] the IESO should test it, publish the result, and stop describing it as baseload. Hydropower's output also changes significantly with seasonal flows, and the IESO knows it. Its own APO lists hydroelectric among the resources whose performance results "*in less effective capacity in the summer than in the winter*".[10] Its 2015 North of Dryden plan says that "*The fall period is typically the most constrained supply period for the North of Dryden sub-region as it is when hydroelectric generation in the Ear Falls area is at its lowest*".[11]

ORA Recommendation 5: That the IESO run the same variability analysis on the hydroelectric fleet that it ran on wind and solar and publish the results.

ORA Recommendation 6: That, until that analysis is published, the non-performance threshold for hydroelectric facilities be set no higher than the 10 percent set for solar, so that the risk of an overstated production factor sits with the bidder, not with ratepayers (as in ORA's Capacity Auction Enhancements submission, Recommendation 6).

Section 3.1 of the draft contract still sets the Minimum Performance Factor at "*eighty percent (80%)*" for every facility,[7] while Exhibit F charges a solar facility once its shortfall exceeds "*0.10*", that is, once it delivers less than 90 percent of what it declared.[7]

ORA Recommendation 7: That section 3.1 of the LT2(e-2) Contract be corrected to match Exhibit F.

Monthly Limits Built on a Climate That Is Changing:

The IESO's proposed fix for monthly factors is a maximum for each technology, set by looking at "*historical output and forecast data for solar, wind and hydro*".[2] For hydropower, history is the wrong guide. The IESO's 2026 APO states: "*As actual weather and seasonal trends diverge from historical trends, supply resources may perform differently from assumed historical performance*".[10] The same report says its supply outlook "*considers historical production data for hydroelectric*".[10]

ORA Recommendation 8: That the monthly maximums for hydroelectric proposals be built on forward, climate-adjusted water flows, not on the historical production record.

ORA Recommendation 9: That the IESO publish the monthly maximums for each resource type in a draft open for comment before the final RFP is issued.

Pay on What Is Delivered:

A participant from TransAlta asked whether the IESO had considered "*scrapping it entirely and going back to something, say, based on actuals*". The answer was "*Not for window two*".[2] On 31 August, ORA asked that a facility whose energy source is water flow be paid on "*Delivered Electricity*", the electricity it actually produces (ORA Recommendation 8).[4]

The answer reaches beyond LT2. The Medium-Term 3 (MT3) RFP, which re-contracts existing facilities, "*will follow these and any other updates that are adopted under the LT2(e-2) RFP for the E-*

PPA model and non-performance obligations".[12] What is decided here will also govern existing hydroelectric facilities.

ORA Recommendation 10: That the IESO state in which procurement window it will pay facilities whose energy source is water flow on delivered electricity, and, if in none, why.

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?*

Storage Marked Down, Hydroelectric Not Measured the Same Way:

Accredited capacity is the share of a resource's installed capacity that the IESO counts on being there when the grid needs it most. The IESO told the session that its new method "*is expected to show reduced capacity contribution from energy storage due to the IESO having recently procured over 3,500 MW of storage*", among other reasons.[1] ORA does not object to measuring storage. It objects to measuring storage alone.

The record of who asked for this is public. On 10 July, Ontario Power Generation (OPG) asked for effective load carrying capacity (ELCC), a measure of what a resource adds at peak, "*to enable a more accurate representation of battery energy storage system (BESS) participation and capability in the grid as storage penetration increases*".[13] On 4 September it asked again for ELCC "*with adequate weighting*".[14] In the same form, OPG "*cautions against the splitting of the capacity procurement into storage and non-storage streams*" without first considering ELCC.[14] The same day, Atura Power, an "*OPG subsidiary*",[15] asked the IESO "*to consider establishing a separate non-storage stream within the capacity procurement*".[16] Northland Power wrote that "*the IESO should consider a gas-only procurement*".[17] TransAlta "*supports the development of a separate capacity stream procurement for gas-fired generation*".[18] CHP CAN wrote that "*The IESO should establish distinct procurement targets for storage and non-storage assets*".[19]

Others asked the IESO to keep the competition open. Energy Storage Canada asked it to "*clearly define the reliability attributes the system requires*" and "*allow any technology capable of providing those attributes to compete*".[20] Clean Energy Canada asked it to keep a "*technology-agnostic capacity procurement target*".[21] EDC warned that a separate non-storage target "*could function as a reserved allocation for gas after storage won every contract in an open competition*".[6] ORA agrees with all three.

The IESO said its options include some that preserve "*the technology agnostic viewpoint, others which do not*", and added: "*We're discussing with the government*".[2]

Each of the three Window 1 capacity contracts lists "*50.00%*" Indigenous participation, including the Eagle Lake Power Reserve.[5] Daniel Morriseau of Eagle Lake First Nation told CBC News: "*There's a big difference between being an equity partner in a project and just being consulted on a project*".[22] Neoen, the First Nation's partner in the project, told CBC News: "*Battery projects really don't use any water for their operations and they don't generate any emissions, so the impact on the environment is very low during the operations of the project*".[22] Lowering the value of storage lowers the value of projects First Nations co-own. No accredited capacity for hydropower has been published under the method now being applied to storage. ORA supports wind, solar and BESS. Sited near where power is used, they can stand in for new transmission lines, as the non-wires needs in this RFP show.[1]

The IESO's own planning model shows why this matters to ratepayers. Its 2026 APO capacity study applied ELCC "*for wind, solar and storage resources*", but not to hydropower, and its analysis of surplus power "*assumes all hydroelectric output is baseload*".[9] OPG uses the same label in its Made-in-Ontario Northern Hydroelectric Opportunities report, where it says that "*Hydroelectric generation can deliver significant baseload power to help fill this deficit*".[23] The IESO's own words say otherwise. In its 20 October 2026 response to stakeholder feedback, answering a question ORA had raised, it said that "*a hydroelectric unit is energy limited*", which it called "*similar to all forms of storage, wind, solar, and energy limited thermal units*".[24] The same North of Dryden plan also said: "*Northern hydroelectric generation is an energy limited resource known to have significantly reduced output and availability during drought conditions of the river system supplying these generating units*".[11]

That model selects 2,136 MW of new hydropower by 2050, even though, in the IESO's own cost table, new hydropower costs more per kilowatt than new wind, solar, battery storage or gas. Only nuclear costs more.[25] The IESO says this study is not a plan. But a model that lets hydropower skip the test that wind, solar and battery storage face makes hydropower look more valuable than it is. If procurement follows the same approach, it will steer buying toward a resource that costs more and delivers less when it is needed.

ORA Recommendation 11: That the IESO publish the accredited capacity of hydroelectric generation, as a share of installed capacity, before it applies a reduced value to storage in LT2 Window 2 (as in ORA's Capacity Accreditation submission, Recommendation 7).

ORA Recommendation 12: That any change in how storage is valued in LT2 Window 2 be applied, by the same method, to hydroelectric generation in the same window (Capacity Accreditation, Recommendation 25).

ORA Recommendation 13: That the LT2 Window 2 capacity target remain technology-neutral, with no separate targets for storage and non-storage resources.

Repowering

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

Repowering is the rebuilding or life extension of an existing facility so that it can win a new contract. The Independent Engineer certificate confirms that a repowered facility has reached commercial operation, and the IESO "*is still considering specific language for I.E. certification*".[1] ORA's concern comes before the certificate: which facilities are offered a new contract, and for how long.

ORA supports using what is already built before building new. The Medium-Term (MT) RFPs are "*the IESO's primary re-contracting mechanism*", and MT2(e) contracts "*achieved a lower weighted average price than new-build LT2 Window 1 Energy projects ($79.55/MWh vs $88.84/MWh)*".[12] A short MT contract of no more than five years also lets each renewal reflect the water flow actually available, which a 20-year contract cannot. ORA does not join the Canadian Renewable Energy Association's request for 30-year contracts as it applies to hydroelectric facilities.[26] ORA repeats its 31 August recommendation (ORA Recommendation 4).[4]

ORA Recommendation 14: That repowered hydroelectric facilities be re-contracted under an MT contract of no more than five years, with a climate-informed performance review at each renewal, rather than given 20-year LT2 contracts.

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

The size of the repowering competition is still unknown. The IESO will limit repowering "*only to the extent we need to*", based on concurrent outages.[2] Atura Power asked the IESO to "*publish the Repowering Cap methodology and an indicative range before final RFP issuance*".[16] ORA asked for the same on 31 August (ORA Recommendation 10).

ORA Recommendation 15: That the IESO publish the Repowering Cap, and the method used to set it, before the final RFP is issued.

Regulation Service Readiness

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

ORA defers to proponents on both questions in this section.

- *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?*

The IESO told the session that deliverability guidance it had promised "*by the end of September*" was "*basically finalized*" and "*coming this week*".[2] Proponents need it before they site projects. ORA supports its prompt release, with the circuit availability maps targeted for November.[1]

- *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?*

ORA defers to proponents on this question.

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

About 500 MW North of Sudbury Could Accommodate Two Proposed Hydropower Stations:

Slide 36 previews Window 3. New 230-kilovolt lines at Hunta, Pinard, Kapuskasing, Porcupine and Kirkland Lake are expected to raise availability north of Sudbury "*in the neighborhood of ~500 MW*".[1]

The IESO's North of Sudbury Bulk Plan says the near-term reinforcements are "*primarily driven by reliability needs, but also provide meaningful enablement for new generation*", and that they "*can support approximately 430 MW of additional hydroelectric development in the region*", a level

"*consistent with the scale of initial hydroelectric developments currently being explored in the Moose River Basin*". A further study of larger hydropower development north of Pinard "*reflects input provided through ongoing co-planning activities involving Taykwa Tagamou Nation, Moose Cree First Nation, and Ontario Power Generation, who requested that the IESO assess the transmission requirements associated with integrating potential hydroelectric development in the Moose River Basin*".[3] The Bulk Plan puts the cost of the whole plan at "*approximately $6.2 billion*", of which "*$3.2 billion*" is for the near-term actions.[3]

The Province announced the two stations, Grand Rapids at about 174 MW and Nine Mile Rapids at about 256 MW, on 9 April 2025.[27] OPG would be a part owner of both, with Taykwa Tagamou Nation and Moose Cree First Nation. Together they total about 430 MW. Neither has been approved.

The IESO's own North of Sudbury planners have described the hydropower these lines could serve. In May 2026, they told stakeholders that "*A large share of supply resources in the area is hydroelectric, which is energy-limited and cannot be relied on at full output in all hours*"; that "*Hydroelectric supply resources are energy-limited and cannot be relied on to meet demand in all hours or conditions*"; and that one cause of the region's needs is "*Low overnight hydro generation (energy-limited resources)*".[28]

The final Bulk Plan adds that hydropower development in the Moose River Basin "*introduces operational complexity associated with cascade river systems, where limited hydraulic storage and short retention times can result in rapid changes in output and corresponding impacts on voltage and system operation*".[3] ORA asks the following questions rather than drawing conclusions.

ORA Recommendation 16: That the IESO state whether the ~500 MW of Window 3 room north of Sudbury is open to all proponents or is expected to be taken by OPG's Grand Rapids and Nine Mile Rapids.

ORA Recommendation 17: That the IESO state through which procurement it expects Grand Rapids and Nine Mile Rapids to be contracted.

ORA Recommendation 18: That the IESO state what share of the North of Sudbury reinforcement cost serves hydroelectric development in the Moose River Basin.

ORA Recommendation 19: That the IESO state who carries that share of the cost if the Moose River Basin stations do not proceed.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Waiting on Government:

The IESO told participants twice that the feedback form would be posted following the presentation. On 14 October, it said, "*the feedback form will be available following today's presentation*".[2] On 19 October, five days later, it was not on the LT2 engagement page.

The session explained why answers are slow. On storage: "*We're discussing with the government*". On the open policy items: "*items that we're still in discussion with government about. We have no updates, unfortunately, at this time*".[2] Slide 27 lists the agricultural land exemptions for repowering and for agrivoltaics, and Canadian content, as items that "*require further direction from government*".[1] Slide 8 says the whole timeline is "*subject to change pending policy direction from the Ministry*".[1]

Stakeholders are also commenting without answers. Nineteen organizations, ORA among them, filed feedback on the 20 August session by 4 September. As of 24 October 2026, the IESO has posted no response to that feedback.[29]

ORA Recommendation 20: That the IESO post its Response to Feedback on the 4 September round before the final LT2 Window 2 documents are issued (as in ORA's Capacity Auction Enhancements submission, Recommendation 13).

ORA Recommendation 21: That the IESO post each feedback form on the day of its session, with the presentation.

ORA Recommendation 22: That the IESO publish the direction it receives from government on each open policy item, and on the valuation of storage, before the final LT2 Window 2 documents are issued.

Protected Lanes Cost Ratepayers:

The Province's own policy paper sets the rule and the exception side by side: "*The government has adopted a competitive approach for procuring non-baseload electricity resources to drive costs down*", and "*Ontario's plan will prioritize clean and reliable baseload electricity from nuclear and hydroelectricity*". The same paper says competitive procurement "*ensures new energy resources are built at lowest cost, thereby protecting ratepayers and taxpayers*".[30]

Hydropower already has its own lane. The Long Lead-Time (LLT) RFP is limited by the Minister's directive of 16 April 2026 to facilities that "*are hydroelectric Electricity generating facilities other than pumped hydroelectric facilities*".[31] LLT contracts are to be awarded "*no later than May 2027*", before LT2 Window 2 energy proposals are submitted in the third quarter of 2027.[1]

Others are now asking for lanes of their own; four requests for gas or non-storage lanes are set out under Evolving Value of Energy Storage. ORA's position has not changed since 31 August: no resource should have one (ORA Recommendation 17).[4] Clean Energy Canada said of a Window 1 provision for gas turbine delays that it "*shifts the risk from the proponent to Ontario ratepayers*".[21] A protected lane does the same. In ORA's opinion, hydropower has its own lane because it can't compete on price, reliability or build time, with wind, solar and battery storage.

Horizon New Energy asked that, when Window 1 prices are released, the hydroelectric bid be left out, "*To avoid confirming the exact price of the only Hydro proposal*".[32] For ratepayers, that price is a useful number, because it shows what hydropower costs when it has to compete. ORA asked on 31 August that Window 1 prices be labelled by resource type wherever no single bid would be exposed (ORA Recommendation 14).[4] ORA therefore asks a question the IESO can answer without revealing the exact bid.

ORA Recommendation 23: That the IESO create no technology set-aside, reserved volume or separate procurement stream for any resource type, whether hydroelectric or natural gas, in LT2 Window 2, and advise the Minister against any directive that would create one.

ORA Recommendation 24: That the IESO state whether the one hydroelectric proposal in LT2 Window 1 was priced above or below the highest-priced energy contract the IESO awarded in that window.

Unanswered Since 31 August:

The IESO has filled in the rated criteria, as ORA asked (ORA Recommendation 13),[1] but it has not answered ORA's other recommendations of 31 August in writing. The 9 October draft contract uses the word "*climate*" zero times and "*drought*" once, in its list of force majeure events.[7] Force majeure is the

clause that excuses a supplier when an event beyond its control stops it from performing, but only if its impact "*could not reasonably have been anticipated as at the Contract Date*".[7]

31 August ORA Rec.	What ORA asked	9 October draft
3	Treat climate-driven loss of water flow as a known risk, not force majeure, in section 11.2(g); wording attached	Unchanged. Drought still listed in section 11.3(a)
5	Support hydroelectric production factors with climate-adjusted hydrology	Unchanged
6	Do not exclude hours lost to drought or low water flow from performance measurement	Unchanged
8	Pay water-fuelled facilities on delivered electricity	"*Not for window two*"
20	No clean energy credit for facilities without fish passage or funded decommissioning	Unchanged (section 2.10)
23	State whether the Province's climate impact assessment was considered	No answer
24	Up-front decommissioning security	Unchanged

The Province's own climate assessment states that "*low water flows due to drought conditions can reduce hydroelectricity generation*", and it rates electrical power generation at high risk now, in the 2050s and in the 2080s.[33] Drought can be anticipated, yet the draft contract still lists it as force majeure.

ORA Recommendation 25: That the IESO adopt the amendment to section 11.2(g) of the LT2(e-2) Contract that ORA attached to its 31 August submission.

ORA Recommendation 26: That, if drought remains in section 11.3(a), the IESO publish its rationale and explain how that protects ratepayers (as in ORA's Capacity Auction Enhancements submission, Recommendation 8).

The Appearance of a Conflict of Interest:

The Chair of the IESO Board was appointed to the Board in November 2025 "*by the Minister of Energy and Mines*" and was then named Chair by the Board. He had served "*most recently as the President and CEO of Ontario Power Generation (OPG)*".[34] The IESO's President and CEO "*has held a number of executive positions at both Hydro One and Ontario Power Generation*", and served as "*Ontario's Deputy Minister of Finance and Deputy Minister of Energy*".[35]

OPG has twice asked for a method that would lower storage's value, and its subsidiary has asked for a stream separate from storage. The IESO's planners now expect their new method to show storage's value falling. OPG, with Taykwa Tagamou Nation and Moose Cree First Nation, asked the IESO to assess the transmission needed for hydroelectric development in the Moose River Basin. ORA alleges no wrongdoing. Set side by side, these facts create the appearance of a conflict of interest, and the IESO's credibility with ratepayers depends on removing it. On 1 October, ORA asked the IESO to publish its Board's conflict of interest policy and asked that the Chair recuse himself from the capacity accreditation decision (ORA's Capacity Accreditation for IESO Procurements submission, Recommendations 15 and 17).

ORA Recommendation 27: That the Chair of the IESO Board recuse himself from decisions in which OPG has an interest, including hydroelectric procurement design, the accreditation of storage and hydroelectric generation, and the North of Sudbury transmission serving the Moose River Basin.

ORA Recommendation 28: That the President and CEO of the IESO recuse himself from the same decisions.

Closing:

Every issue in this submission lands on the same people. Ratepayers pay when a bidder sets its own number, when hydroelectric keeps a margin that solar has lost, when drought excuses a shortfall, when transmission planning makes room for stations not yet approved, and when a resource is handed a lane instead of a competition. The Province's climate assessment, the IESO's own Annual Planning Outlook and its North of Sudbury Bulk Plan all say the water is not guaranteed. ORA asks the IESO to act on its own record.

Respectfully submitted,

Linda Heron
Chair, Ontario Rivers Alliance
[redacted]

Endnotes:

1. *Independent Electricity System Operator (IESO), Long-Term 2 (LT2) RFP, Window 2, engagement presentation, 14 October 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/long-term-rfp/lt2-rfp-20261014-engagement-presentation.pdf*
2. *IESO, LT2 RFP Window 2 engagement webinar, recording, 14 October 2026. https://youtu.be/H8MvdQkcwz8*
3. *IESO, North of Sudbury Bulk Plan, 20 August 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/nsbp-20260820-north-of-sudbury-bulk-plan-report.pdf*
4. *Ontario Rivers Alliance, Feedback Form, Long-Term 2 RFP, August 20, 2026, submitted 31 August 2026. https://www.ieso.ca/Sector-Participants/Engagement-Initiatives/Engagements/Long-Term-RFP*
5. *IESO, LT2(c-1) Public Result Table With Individual Prices, 2 July 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/long-term-rfp/capacity/LT2c-1-20260702-Public-Result-Table-With-Individual-Prices.pdf*
6. *Environmental Defence Canada, Feedback Form, Long-Term 2 RFP, 4 September 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/long-term-rfp/lt2-rfp-20260904-feedback-form-EDC.pdf*
7. *IESO, Long-Term 2 Energy Supply (Window 2) (LT2(e-2)) Contract, draft, 9 October 2026. https://www.ieso.ca/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Term-2-RFP*
8. *IESO, Supply Mix and Generation, web page, accessed 27 August 2026. https://www.ieso.ca/Learn/Ontario-Electricity-Grid/Supply-Mix-and-Generation*
9. *IESO, 2026 Annual Planning Outlook: Capacity Expansion Scenario and Outcomes, September 2026, pp.9 and 17. https://www.ieso.ca/apo*
10. *IESO, 2026 Annual Planning Outlook: Ontario's electricity system needs: 2027-2050, March 2026, pp.46, 71 and 74. https://www.ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/2026/2026-Annual-Planning-Outlook.pdf*
11. *Ontario Power Authority (now part of the IESO), North of Dryden Integrated Regional Resource Plan, 27 January 2015, p.124. https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/North-of-Dryden/North-Dryden-Report-2015-01-27.pdf*
12. *IESO, Medium-Term 3 (MT3) RFP, engagement presentation, October 2026. https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Medium-Term-RFP*

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