Feedback Form

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

Feedback Provided by:

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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**
- 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?

  The rational for adding rated criteria points to new areas in Southern Ontario does not appear equitable. The stated intention is to maximize output in areas where there has shown to be "more availability on the system" But this could apply to circuits within the excluded areas of Essa. Other excluded areas are highly urbanized, but Essa is not. We recommend including Essa in the list of Eligible zones.

Non-Wires Alternatives (NWA)

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

  The list of specified circuits seems very small. Are there not other circuits that could also handle extra load? Why not let the Deliverable Guidance process dictate the best location to site a project?

Agricultural Land Considerations

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

  We agree that this should be enforced. If Agrivoltaics are to be considered, this must be done very carefully with full consideration given to the affected communities.

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?

  We do not agree with reducing the threshold factor from 0.2 to 0.1 for solar. In our experience, 3-year averages for solar voltaic projects will exceed this threshold occasionally over the life of the project due to environmental variations. We strongly recommend removing this distinction and using a 0.2 factor for all technologies.

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?

  No comment

Repowering

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

  No comment

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

  As long as New Build projects essentially compete separately from Repowering projects as presently proposed we have no comments.

Regulation Service Readiness

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

  No comment

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

  No comment

Deliverability and System Performance

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

  No comment

- 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?

  No comment

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

  No comment

General Comments/Feedback

Do you have additional feedback to share with the IESO?

We note that the IESO now needs to apply some caps to Monthly Imputed Production Factors to "tune" the payment model. This highlights the intrinsic complication of the Enhanced Power Purchase Agreement. At some point will IESO reconsider the use of the more conventional power purchase agreements used in the past?