

LLT RFP Question and Comment Period

August 12, 2026

Questions and Comments

The following document summarizes IESO responses to the questions and comments submitted to the IESO in respect of the final LLT RFP documents posted on May 6, 2026, that were submitted pursuant to Section 3.2(a) of the Long Lead-Time Request for Proposals (LLT RFPs) prior to the Question and Comment Deadline.

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Defined Terms

Capitalized terms used but not defined in the IESO Responses in this document have the meanings given to them in the LLT(e) RFP or the LLT(c) RFP (each, an “LLT RFP”, and collectively, the “**LLT RFPs**”, and the LLT(e) Contract or the LLT(c) Contract (each an “LLT Contract”, and collectively, the “**LLT Contracts**”), as applicable. Italicized terms have the meaning given to them in the IESO Market Rules. Questions and comments submitted by proponents are included as submitted and have not been revised to incorporate defined terms used in the LLT RFPs, the LLT Contracts, or the Market Rules.

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1) For circuits to be considered part of a common corridor, must they both run in parallel and have common start and end transmission stations.	Per the LLT(c) RFP and LLT(e) RFP, Common Corridor Circuits are defined as: <i>"Circuits that are parallel to one another and utilize the same, or proximate parallel land-based rights of way, or otherwise start and end at common transmission stations."</i> Based on this definition, circuits do not need to both run in parallel and have common start and end transmission stations to be considered Common Corridor Circuits. The definition is satisfied where the circuits either utilize the same (or proximate parallel) rights of way while running in parallel, or start and end at common transmission stations. For greater clarity, the IESO will update the definition of Common Corridor Circuit in both the LLT(c) and LLT(e) RFPs as follows: Common Corridor Circuit means circuits that: i) are parallel to one another and utilize the same, or proximate parallel, land-based rights-of-way; or ii) originate and terminate at common transmission stations.
2) Would the IESO permit a Project to consist of 2 or more sites connected through a single connection point and meter to the IESO controlled grid? This situation is analogous to a windfarm spread across many properties or thousands of acres or a solar farm with many different sections connected through a single connection point and meter. This would provide administrative ease for the IESO with a single contract facility for a greater Capacity, reduce costs through reduced protection,	No, each LLT Energy Project or LLT Capacity Project must consist of a single <i>generation facility</i>, connected to a single meter, which is not used by any other Facility. This provides the IESO with the best visibility of individual <i>resources</i>.

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control, metering infrastructure without sacrificing reliability or visibility into each unit; and reduce risk for bidders.	
3) In Section 2.1 (f), it is stated that “For any Proposal in respect of an LLT Capacity Project seeking to connect to a Distribution System, the LLT Capacity Project may not be the subject of a Connection Impact Assessment”. Please confirm the IESO allows any Proposal in respect of an LLT Capacity project seeking to connect to a Transmission System to submit a System Impact Assessment.	Yes. The restriction in Section 2.1(f) applies to LLT Capacity Projects seeking to connect to a Distribution System and relates specifically to Connection Impact Assessments. The LLT(c) RFP does not contain a corresponding restriction prohibiting proponents seeking to connect to a Transmission System from submitting or obtaining a System Impact Assessment. However, the IESO encourages proponents to wait until contract award before applying for a System Impact Assessment, as a System Impact Assessment may involve material costs and there is no certainty that a project will ultimately be awarded an LLT(c) Contract. In addition, proponents should be aware that System Impact Assessment results obtained prior to contract award may be affected by procurement outcomes and other system developments occurring during the procurement process, and would almost certainly require reassessment after contract award.
4) In Section 15.6 (a), the length of the Capacity Check Test Notice is not specified. To ensure the facility is completely charged, in preparation for the Delivery Capacity Check Test, could the IESO please confirm there will be at least a 24-hour period before the commencement of the Capacity Check Test after the Capacity Check Test Notice is given?	Per Section 15.6(a)(ii) the Capacity Check Test Window (ie. the time period within which the Capacity Check Test is required to be conducted) for the Capacity Check Test shall be within ten (10) consecutive Business Day period following delivery of the Capacity Check Test Notice, provided that ambient temperature conditions remain within specified outlier thresholds.

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	Therefore, Proponents will have ten Business Days (or longer in the event of extreme ambient temperatures) after the Capacity Check Test Notice is issued to commence the Capacity Check Test.
5) In Section 15.6 (a) (iii), it is specified that "Each Withdrawal Capability Check Test consists of the Facility Withdrawing Electricity following the completion of a Delivery Capacity Check Test". Please confirm the IESO will allow sufficient time between the Delivery Capacity Check Test and the Withdrawal Capability Check Test to accommodate ramp rate times, and where these ramp rate times will be specified in the LLT Contract.	The LLT(c) Contract does not prescribe specific ramp rate requirements or a prescribed transition period between the Delivery Capacity Check Test and the Withdrawal Capability Check Test. In order to pass the Withdrawal Capability Check Test, the Supplier must confirm the ability of the Facility to Withdraw Electricity at a maximum instantaneous rate that is equal to or greater than the Monthly Contract Capacity. As long as this can be demonstrated for the number of hours equal to the CCT Duration or if the Facility becomes Fully Charged in less time, the Facility would pass the test, regardless of the time required to ramp up to the Withdrawal Capability.
6) In Section 11.3 (j) (ii), Force Majeure includes "any unanticipated maintenance or Outage affecting the Facility... which results from a failure of equipment that prevents the Facility from producing Electricity". Please confirm that any failure of equipment that prevents the Facility from withdrawing Electricity would also qualify for Force Majeure under this section, as Withdrawing Electricity is necessary to produce Electricity.	Yes. The IESO agrees that an equipment failure that prevents the Facility from withdrawing Electricity may have the same practical effect as an equipment failure that prevents the Facility from producing Electricity. The IESO intends to address this issue through an Addendum and will revise the Force Majeure provisions so that the applicable provision also captures failures that prevent the Facility from Withdrawing Electricity.
7) Regarding the Must-Offer Obligation, in Section 2.6 (e), it is stated that "Supplier shall use Commercially Reasonable Efforts to maintain sufficient State-of-Charge to enable the Facility to satisfy dispatch instructions that correspond with the offers the Supplier submits in satisfying its Must-Offer	The scenario described is likely to fall within the Supplier's obligation to use Commercially Reasonable Efforts to maintain sufficient State-of-Charge.

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Obligation.” Could the IESO please confirm that in the following scenario, the Supplier would be using Commercially Reasonable Efforts to maintain sufficient State-of-Charge as per Section 2.5 (e)? Scenario: Consider a 200 MW, 8-hour facility (with symmetrical charging-i.e. 200 MW charge and 200 MW discharge) with 50% Round Trip Efficiency (RTE), which offers 200 MW in the Day-Ahead Market on both March 1st and March 2nd. During the Qualifying Hours on March 2nd, the Facility is dispatched to provide all 200 MW in the final Qualifying Hours (15:00 to 23:00). Between 23:00 on March 2nd and 07:00 on March 3rd, the facility charges at its rated withdrawal capacity of 200 MW. At 07:00 on March 3rd, the facility is at 50% State of Charge (800 MWh of storage capacity) due to the aforementioned RTE. This effectively means that the plant can deliver electricity at the Contract Capacity for only 4 hours despite charging continuously for all the possible 8 hours between 23:00 and 07:00 at its rated capacity. This happens despite the Supplier submitting 200 MW in the Day Ahead Market on March 2nd due to not knowing the actual dispatch profile of the asset on March 2nd.	For greater clarity, a Facility does not need to be Fully Charged to meet the Must Offer Obligation outlined in the LLT(c) Contract. Suppliers must offer their Contract Capacity, that is not subject to an Outage, into the Day Ahead Market during the Qualifying Hours (currently 7am to 11pm EST on Business Days). Until such time as dispatch tools are able to factor in State-of-Charge, Suppliers will be required to manage energy limits through the “Maximum Daily Energy Limit” parameter. This will allow Suppliers to offer in their full capacity but will only result in Facilities being dispatched up to what they can provide.
8) How does the reserve price calculation methodology change with storage duration? How will the additional benefits provided by an 8-hour vs. 10-hour vs. 12-hour storage system be valued in the reserve price calculation? Proponents may not bid with a longer duration system unless the evaluation methodology is clear due to the cost implications involved.	The Reserve Price will be used to determine the maximum acceptable proposal price, and will not be compared to the Evaluated Proposal Price. As the Reserve Price is intended to function as a price ceiling that is reflective of the maximum willingness to pay, the IESO does not intend to establish separate Reserve Prices based on storage duration. In establishing the Reserve Price for the LLT(c) RFP, the IESO will consider the incremental cost for an Electricity Storage Facility to have a Duration Capability of 12 hours or greater, compared to the 8 hour

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	facilities secured through the LT2 RFP. Given that a 12+ hour Electricity Storage Facility provides the greatest value among the eligible Duration Capability categories, using this value in the Reserve Price calculation results in a Reserve Price that is applicable across all potential Duration Capabilities.
9) Will the IESO publish its reconciliation between the August 2025 Hybrid Resource Portfolio Equivalency Assessment and the decision to establish an LLT hydro energy stream? If no such reconciliation exists, will the IESO commit to preparing and publishing one before any LLT contract is executed?	The IESO recognizes the value of a hybrid resource portfolio and continues to pursue this objective through its ongoing procurements of variable generation and energy storage resources, including through the multiple procurement windows of the LT2 RFP. At the same time, the IESO sees value in diversifying Ontario's Electricity supply mix through the acquisition of resources available under the LLT RFP, including long lead-time hydroelectric resources that can contribute to system reliability and long-term energy needs. In addition, the IESO has been directed by the Ministry of Energy and Mines to conduct the LLT RFP procurement. The design of the procurement reflects both this direction and the IESO's assessment of the benefits of maintaining a diverse portfolio of Electricity resources to support Ontario's evolving electricity system.
10) How does the IESO reconcile its own reliability criterion, that firm generation be “not energy limited” and not dependent on a “variable fuel,” and its own findings that northern hydro is “an energy limited resource ... with significantly reduced output ... during drought” and that the North of Sudbury region has “low overnight hydro generation (energy-limited	While hydroelectric resources can be subject to hydrological variability and, in some circumstances, energy limitations, they have historically provided significant reliability, flexibility, and energy value to the Ontario Electricity system. The IESO assesses resource adequacy at the portfolio level and considers the contribution of different technologies,

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resources),” with a 40-year energy procurement built around hydroelectricity?	including their respective strengths and limitations, in meeting Ontario's long-term reliability and energy needs. Consistent with this approach, the IESO continues to procure and integrate a range of resources, including variable generation, energy storage, and dispatchable resources through other procurement initiatives such as the LT2 RFP. The inclusion of an energy stream in the LLT RFP reflects the value that long lead-time hydroelectric resources can provide as part of a broader and diversified resource portfolio.
11) For LLT hydro sited in Northern Ontario (including the Moose River Basin), how is the electricity expected to be delivered, given the transmission limitations the IESO described for LT2 windows two and three, and what transmission-enabling costs, including on a per-megawatt basis, would fall to ratepayers?	Only projects that are determined to be deliverable through the IESO's Deliverability Test, conducted as part of Stage 5 of Proposal evaluation under the LLT(e) RFP or LLT(c) RFP, will be eligible to receive an LLT(e) Contract or LLT(c) Contract.
12) What portion of the northern transmission and supply build-out is predicated on the “mining component” of the demand forecast, and what is the ratepayer exposure if that load materializes only at the low scenario? What off-ramps or phased commitment mechanisms would limit that exposure? Will the IESO build in off-ramps or phased commitments if only the low mining scenario materializes?	The LLT RFP is intended to address Ontario's overall long-term energy and capacity needs and is not predicated on any single regional load forecast component, including mining-related demand in Northern Ontario. Accordingly, the LLT RFP does not contemplate off-ramps, phased commitments, or contract adjustments based on whether specific regional demand forecasts, including mining-related demand, materialize or evolve. Contracted resources will be procured to support Ontario's overall electricity system needs and long-term reliability requirements, rather than the requirements of any particular region or customer segment. The IESO retains flexibility to adjust the quantity of resources procured through future procurement opportunities, including

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	future LT2 RFP procurement windows and other resource acquisition initiatives, based on evolving system needs and updated demand forecasts.
13) Will the IESO amend Article 11 of the LLT(e) Contract to exclude foreseeable, climate-consistent hydrologic conditions (drought, reduced snowpack, earlier runoff, chronic low summer flows) from Force Majeure? If the IESO's position is that the existing "could not reasonably have been anticipated" qualifier already excludes such conditions, will it confirm that interpretation in writing and codify it by Addendum?	The IESO is not contemplating updates of this nature to Article 11 of the LLT(e) Contract. Article 11 defines Force Majeure as an act, event, cause, or condition that prevents a Party from performing its obligations, but only if and to the extent that the impact of such act, event, cause, or condition could not reasonably have been anticipated as at the Contract Date and is beyond the affected Party's reasonable control. Whether a particular hydrologic or other climate-related condition qualifies as Force Majeure would depend on the specific facts and circumstances. In addition, the LLT(e) Contract contains protections for ratepayers where a Force Majeure event results in prolonged non-performance. Following COD, a Supplier would not receive Monthly Payments for the portion of Contract Capacity affected by a Force Majeure event, in accordance with Exhibit J. Further, under Section 11.1(g), if a Supplier is unable to perform its obligations due to Force Majeure for more than an aggregate of 36 months in any 60-month period, either Party may terminate the agreement without any further costs or payments, other than amounts accrued and payable up to the termination date.
14) Will the IESO require the Proposal-stage Provincial Crown Land Shapefile to disclose the full hydraulic footprint, including the headpond and inundation extent, drawdown, altered reaches, wetlands and tributaries,	As discussed during the June 25, 2026 stakeholder engagement session, the Provincial Crown Land Shapefile required by the LLT RFP and the shapefile required as part of the Ministry of Natural

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before Municipal and Indigenous support confirmations, notwithstanding its June 25, 2026 statement that “the entire water body may not need to be included”?	Resources' Public Land Site Report (PLSR) serve different purposes. Under the LLT RFP, the Provincial Crown Land Shapefile is required to map the boundary of the Project Site located on Provincial Crown Land and be consistent with the Project Site information included in the applicable PLSR. The purpose of the Provincial Crown Land Shapefile under the LLT RFP is only to identify any overlap where projects are proposed to be located on Provincial Crown Land to be considered when offering contracts. The PLSR may require a broader project boundary and additional project features, including reservoirs, impoundments, water control structures, or weirs. Accordingly, the shapefile submitted to MNR may include a larger area than a Proponent elects to include as its Project Site in a Proposal submitted to the IESO. The LLT(e) RFP does not require Proponents to disclose the full hydraulic footprint as a condition of obtaining Municipal Support Confirmations or Indigenous Support Confirmations. Municipalities and Indigenous communities work directly with Proponents to determine the requirements to obtain support confirmation. Proponents remain responsible for conducting engagement activities and satisfying all applicable permitting, and regulatory requirements, including any requirements of the Ministry of Natural Resources and other applicable authorities.
15) Will the IESO publish a consolidated ratepayer and taxpayer exposure analysis, and amend the contract so that Environmental Attributes from ratepayer-funded LLT contracts accrue to ratepayers for the full term, given that Section	No. The IESO does not intend to publish a separate consolidated ratepayer and taxpayer exposure analysis. The treatment of Environmental Attributes for the first twenty years of the LLT(e) Contract was

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2.10 currently gives the Buyer no interest in them for the first 20 years and only 50 percent thereafter?	designed to be generally consistent with the LT2 RFP framework, under which suppliers retain Environmental Attributes throughout the contract term. Given the longer 40-year term of the LLT(e) Contract, the IESO introduced a new provision that requires the sharing of Environmental Attribute proceeds with the Buyer (and hence the ratepayer) during the second half of the Term.
16) Will the IESO include enforceable decommissioning and financial assurance obligations in the LLT contracts, sufficient to remove facilities that are no longer viable, no longer in the public interest, or causing unacceptable environmental harm?	The IESO does not currently contemplate amendments to the LLT(e) Contract or LLT(c) contract to include additional decommissioning or financial assurance obligations. Suppliers are required to comply with all applicable Laws and Regulations, including requirements relating to environmental protection, decommissioning, site reclamation, permits, and approvals. The IESO expects these matters to be addressed through the applicable legislative, regulatory, and permitting frameworks rather than through additional contract provisions.
17) Can and should proponents submit a longer list of team experience, attached as a separate exhibit in the Prescribed Form: Proponent Information, Declarations and Workbook (Capacity)? Or is the Proposal Workbook excel file, Team Member Experience worksheet the only place that proponents should include their team experience, which is limited to only 2 Team Member/Qualifying Project inputs for each of Planning, Developing, Financing, Constructing, and Operating?	Proponents are required to submit all relevant information regarding Team Member Experience in the Team Member Experience worksheet of the Proposal Workbook. The worksheet is designed to capture the required two (2) Designated Team Members who have managerial experience on a Qualifying Project in each of the five categories of Planning, Developing, Financing, Constructing and Operating, to satisfy the Team Member

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	Experience requirements outlined in Section 2.1(a)(ii) of the LLT RFP. The Team Member Experience claimed for each Designated Team Member submitted as a part of the Prescribed Form: Proponent Information, Declarations and Workbook (Capacity) pursuant to Section 2.1(a)(ii) must be supported by an accompanying statutory declaration of an officer of the Proponent in respect of the information submitted in respect of Team Member Experience. Any additional information related to Team Member Experience submitted outside of the Proposal Workbook, including in supplementary exhibits or attachments, may not be evaluated by the IESO. Proponents should therefore ensure that the Team Member Experience they intend the IESO to assess is included in the Team Member Experience worksheet as part of the Proposal Workbook.
18) Regarding the Proposal Workbook excel file, Project Site Information worksheet, General Project Site Information section. If proponents have a Site that is made up of more than one Properties that are all within the same Municipality but happen to fall under different dropdown options for Items 64 through 69 (different Census Division, City/Town, and/or Postal Code). How should proponents approach this – should they input this information indicatively for only one of the Properties for Items 64 through 69, and then list each of the Properties along with their respective PINs later in Item 79? * Also can the IESO please check the validity of the information in the dropdowns. As an example, Napanee is not in Hastings County.	Where a Project Site is comprised of multiple Properties that have different values for Items 64 through 67, Proponents should provide the <u>corresponding information for the Property that represents the majority of the land area incorporated in the Project</u> Site in Items 64 through 67. Proponents should also include the full addresses of all Properties that comprise the Project Site in Item 63, including all applicable census divisions, city/town and postal code, and identify all applicable Properties and PINs in Item 79. The IESO acknowledges the issue identified with certain dropdown values in the Proposal Workbook. The IESO will revise the dropdowns by the deadline for issuing addenda to correct known errors,

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	including the example noted in the question.
19) Regarding the Proposal Submission: Can proponents submit the Proposal Fee, the other components of the Electronic Submission, and the Hard Copy Submission at different times? For example, can the Proposal Fee be submitted as a standalone item one month in advance of the Proposal Submission Deadline?	Yes. The Proposal Fee, the electronic submission materials, and the hard copy submission materials do not need to be submitted at the same time, provided that all applicable submission requirements are satisfied by the Proposal Submission Deadline. Proponents are strongly encouraged to follow the Proposal Submission requirements detailed in Section 3.7 of the LLT RFP, including using the correct naming convention for files and email subject lines (which should include the Project ID), and providing all other required information when submitting the Proposal Fee and Proposal Security.
20) The Proposal Workbook should allow proponents to input Primary Proposal PQs and PQ alternates that utilize different connection points, and not be limited to the choice of connection point made in the Primary Proposal PQ. The choice of connection point for each of the Primary Proposal PQ, the PQ Alternates 1 and 2, and each of the respective Alternative Allocations should all be independent of one another. Each should be allowed to select connecting directly to a TS or to one or more circuits, and each should be allowed to select its own connection voltage. LLT RFP participants may have a variety of potential connection points available to them for the same project site, and their choice of connection point may vary depending on Project size in different PQ Alternates. Limiting their connection options in the proposal submission is an unnecessary restriction.	The IESO does not intend to amend the Proposal Workbook in this manner. The Proposal PQ Alternate and alternative allocation requirements reflected in the Proposal Workbook is intentional and intended to implement the requirements set out in Section 2.1(g)(iii) of the LLT RFP. In particular, Section 2.1(g)(iii) requires that Proposal PQ Alternates proposing a Connection Point comprised of multiple connections allocate capacity among the Circuits or Feeders identified for the Primary Proposal PQ (and any alternative Circuits or Feeders designated pursuant to Section 2.1(g)(ii)). In addition, the definition of "Proposal PQ Alternate" requires that a Proposal PQ Alternate use the same Connection Point as the Primary Proposal PQ, subject to the Connection Point Requirements set out in Section 2.1(g).

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	Accordingly the Proposal Workbook does not permit each Primary Proposal PQ, Proposal PQ Alternate, and alternative allocation to independently select different connection points, voltages, and transmission configurations. The IESO encourages Proponents to explore various connection options through the pre-deliverability tests that are currently being offered and/or by scheduling a Deliverability consultation prior to submitting a Proposal. The next pre-deliverability test intake form submission deadline is September 9, 2026. This will be the final round for pre-deliverability testing.
21) The Connection Information worksheet currently allows proponents to input a Primary Proposal PQ, a Proposal PQ Alternate 1 and a Proposal PQ Alternate 2 (excel file rows 33-79). For each of these proponents can also include Alternative Allocations (excel file rows 80-118). Can the IESO please confirm what happens with the Primary versus Alternative Allocations (rows 33-79 versus rows 80-118). Assuming a Proposal reaches Stage 5 of the Proposal Evaluation and has populated both, is a Deliverability Test run for both the Primary and Alternative Allocations?	If a Proposal reaches Stage 5 and includes both a primary allocation and an alternative allocation, the IESO will initially perform the Deliverability Test using the primary allocation. Where the primary allocation is not deliverable, or where consideration of the alternative allocation is otherwise necessary as part of the Deliverability Test process, the IESO may assess the alternative allocation in accordance with Section 2.1(g)(iv) of the LLT RFP.
22) As currently set up, assuming a common corridor circuit with four circuits. If a proponent has proposed as its Primary Proposal PQ a connection into 4 circuits: C1, C2, C3, C4. For all other PQ Alternates and Alternative Allocations, can proponents then select any combination of all, some, or just one of these four circuits C1, C2, C3, and C4?	Yes. Where a Primary Proposal PQ identifies a Connection Point comprised of up to four Common Corridor Circuits, Proposal PQ Alternates and alternative allocations may utilize any combination of those identified circuits, provided they otherwise comply with the requirements of Section 2.1(g) of the LLT RFP.

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As an example, is the following set-up permissible?					Accordingly, in the provided example in the question, if a Primary Proposal PQ identifies circuits C1, C2, C3 and C4, a Proposal PQ Alternate or alternative allocation may allocate capacity across all four circuits, any subset of those circuits, or one of those circuits, subject to the requirements of the LLT RFP and the Proposal Workbook. The example configuration provided in the question is permissible.
Transmission System Connection Information	Primary Proposal PQ	Proposal PQ Alternate 1	Proposal PQ Alternate 2		
Primary Proposal Allocation	100 MW on C1 100 MW on C2 100 MW on C3 100 MW on C4	399 MW on C2	199 MW on C3 199 MW on C4		
Alternative Allocation for Common Corridor Circuits	200 MW on C1 200 MW on C2	399 MW on C4	99.5 MW on C1 99.5 MW on C2 99.5 MW on C3 99.5 MW on C4		
23) Should the proposed Fixed Capacity Payments bid into the LLT RFP be above the Reserve Price, would the IESO engage Canada Infrastructure Bank to work with the parties to improve project financing costs in order to make the projects cost-effective enough to secure an IESO LLT Contract?					The LLT RFP does not include provisions related to the IESO engaging third-party financial institutions to work with Proponents to improve financing costs following the review of Economic Bid Statements should proposed prices be above the Reserve Price. Proponents may pursue financing arrangements and other project development opportunities that reduce project costs prior to submitting a Proposal and reflect those arrangements in their submitted proposal prices. Accordingly, Proponents should submit their most competitive price, taking into account all anticipated costs, risks, and financing considerations.
24) Would a foreign entity with a Canadian office, providing services through those Ordinarily Resident in Canada, qualify as Canadian labour under the LLT RFP?					There are different requirements that apply to Canadian labour for the purposes of the Supply Chain Disclosure Plan and the Committed Canadian Content Percentage. As part of the Supply Chain Disclosure Plan, a Proponent is required to set out services are expected to be Canadian Status Services or supplied by Canadian Status Supply-Chain Participants. A Canadian Status Service is a service where

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	all of the natural persons physically performing the service perform such service in Canada and are Ordinarily Resident in Canada. This could include a foreign entity that, for purposes of the project, only provides services in Canada, using only employees and/or contractors that are Ordinarily Resident in Canada. To qualify to be included as part of the Canadian Committed Content Percentage, Construction Labour must be provided from a Canadian Construction Labour Supplier which is a Person that is: a) is a Canadian Status Supply-Chain Participant; and b) provides Construction Labour using only employees and/or contractors that are Ordinarily Resident in Canada. In determining whether a foreign entity qualifies as a Canadian Status Supply-Chain Participant, the relevant consideration is not simply whether it has a Canadian office. For an entity that is not controlled by another person, the entity's headquarters or main office must be located in Canada. For an entity that is controlled by another person, the person that ultimately controls the entity must either be Ordinarily Resident in Canada, or, if the ultimate controlling person is an entity, it must have its headquarters or main office located in Canada.
25) For purposes of the LLT(c) RFP, does a compressed carbon dioxide (CO₂) energy storage facility that employs the phase change properties of carbon dioxide, sometimes referred to as a CO₂ battery, fall within the	No, the IESO considers compressed CO₂ energy storage facilities a form of compressed gas energy storage and not Pumped Thermal Energy Storage. The IESO previously clarified that compressed gas energy storage (other than

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definition of a Pumped Thermal Energy Storage?	Compressed Air Energy Storage) is not eligible to participate in the LLT RFP and shared this information as part of the November 28, 2025 Response to Feedback. As stated in the response, while the technology is not eligible to participate in the LLT RFP, compressed CO2 energy storage remains eligible to participate in future windows of the LT2 RFP. The IESO has revised the definition of Pumped Thermal Energy Storage in the LLT(c) RFP to provide further clarity. The revised definition, issued through Addendum No. 1, is as follows: Pumped Thermal Energy Storage means an electricity storage system that, during charging, uses Electricity to drive a heat pump to store energy principally in the form of a thermal potential and, during discharging, uses the stored thermal potential to drive a heat engine to generate Electricity. The revised definition is also aligned with the definition of Pumped Thermal Energy Storage that is included on page 25 of the Pathways to Decarbonization: Appendix B that was published by the IESO on December 15, 2022.