

Feedback Form

Long-Term 2 RFP – June 16, 2026

Feedback Provided by:

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Date: July 3, 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 June 16th, Long-Term 2 RFP 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 July 3, 2026.

Domestic Content Requirements

Do you have feedback on the proposed requirements?

Stakeholders are encouraged to review and provide feedback on the domestic content provisions that were applied for the LLT RFP and can be found in the [LLT RFP Ministerial Directive](#)

APPrO is aware of the ongoing considerations in this area and reserves the right to provide comments in this area at a later time, should developments occur that warrant commentary.

Increased Proposal Fees

Do you have feedback on newly proposed fees?

APPrO is aware of the ongoing considerations in this area and reserves the right to provide comments in this area at a later time, should developments occur that warrant commentary.

E-PPA Design: DA to RT Adjustments

Do you have any comments to share with the IESO regarding the consideration of the IESO removing the DARTA mechanism for LT 2 Window 2?

APPrO is concerned about the IESO's consideration of removing the DARTA mechanism for LT2 Window 2.

Notwithstanding the IESO's assertion that DARTA was intended as an interim measure (slide 31 of June 16, 2026 Long Term RFP Webinar), APPrO cannot see how the risk associated with changes between the Day Ahead period and the Real Time period has changed in such a way as to support the removal of the mechanism. In APPrO's view, removal of these provisions constitutes a unilateral and significant transfer of uncontrollable risk from the IESO to participants. Particularly for those technologies that rely on weather for their "fuel" availability (i.e. wind and solar), there have been no changes made that have mitigated the risk that occurs between forecast weather at the time of day ahead offers, and actual weather that plays out in real time.

Day Ahead to Real Time price deviations in the first year of MRP have exceeded expectations. As a result, the cost to the IESO/ratepayers of having proponents own and price that risk has gone up significantly. Centralizing and socializing the risk should be considered a cost mitigation measure.

Developers are facing the same, if not more, commercial risk for the next window, including various policy and political risks in addition to the regular development risks. It is not in the best interest of the IESO or the province to introduce an additional barrier to investment in the province.

APPrO understands that the IESO does not want to own weather risk that it cannot control, but to impose that same risk on market participants – who also cannot control it – with no reasonable means to mitigate the risk (many of the smaller MPs will not have established trading functions that can deal with this issue) appears unfair and seems to imply that the MPs should simply accept the increased unmitigated risk with no corresponding return.

APPrO hopes that the IESO is open to continued discussions in this area to more equitably deal with the issue of unmitigated risk. APPrO looks forward to those discussions.

Locational Rated Criteria

Do you have feedback on the proposed locational rated criteria?

APPrO is aware of the ongoing considerations in this area and reserves the right to provide comments in this area at a later time, should developments occur that warrant commentary.

Exclusion Criteria

Do you have feedback on the use of exclusion criteria to prohibit participation by any Proponent, including entities that Controlled the Proponent, deemed by the IESO not to be in good standing?

APPrO does not support the proposed procurement exclusion as a mechanism to address the risk of proponents declining to execute a contract. While ensuring bidder commitment is an important objective, exclusion measures do not address the underlying factors that may prevent a project from proceeding, including changes in project economics, financing conditions, regulatory requirements, or connection costs.

The proposed approach may also have unintended consequences, including reduced competition, fewer qualified participants, and more conservative bid pricing as proponents seek to manage additional procurement risk. These outcomes could ultimately undermine the effectiveness and value of the procurement process.

APPrO believes that prohibition of Proponents from future participation in the highlighted circumstances is more extreme than necessary to address the underlying risk. APPrO believes that other, less punitive, measures exist to deal with the situation.

There are already safeguards in place that discourage MPs from the not accepting an awarded contract under an IESO procurement. The loss of the security deposit is one such safeguard and the reputational harm that accrues to a MP in such a situation is another. In APPrO's view, prohibition of a MP from procurement activities for a period of 3 years or more is overly punitive, and in fact, punishes more than just the MP since it limits the amount of participation in future procurement activities, which is to the detriment of the market and the outcome of the procurement actions.

APPrO trusts that with some additional stakeholding, the IESO can find some other means by which to satisfactorily deter non-acceptance of contract awards without such harsh penalties to both MPs and the procurement process itself.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

APPrO appreciates the opportunity to provide these comments and looks forward to additional discussion on the items highlighted above.