

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](#)

Increased Proposal Fees

Do you have feedback on newly proposed fees?

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?

Locational Rated Criteria

Do you have feedback on the proposed locational rated criteria?

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?

General Comments/Feedback

Do you have additional feedback to share with the IESO?

As the IESO prepares for the LT-2 window 2 process for energy projects, we wish to highlight a subtle but important update that the IESO could make to its "prescribed form" for municipal support. The "*The Evidence of Municipal Support*" form for the e-1 window called on local municipalities to attest that specifically the project lands "*do not contain Prime Agricultural Areas*" for ground mount solar projects, and that this type of occurrence was not allowed for a submission, without any further explanation. In window 1, scenarios arose where large parcels of land were identified in some places

where the lands were partially "*Prime Agricultural Areas*" ("PAA"), but not the area planned for solar development. For example, a 200 acre parcel of land could be designated as PAA on half of the land but be completely appropriate with no PAA on the other 100 acres. The window 1 Prescribed Form would not allow such a situation since the forms states that it is the project *lands* that have the PAA designation, as opposed to the project layout or *footprint* being located on PAA.

This type of 'partial' coverage of land use designation happens more often than perhaps the IESO realizes, and these land use instances could otherwise be highly suitable sites for utility-scale solar. In essence, the IESO could update its form to confirm that a site located on lands that have partially designated Rural areas (with marginal soil) could be developed while other areas of partially designated PAA with high value soil would still be avoided and this would still follow the guidelines and policy from the updated Provincial Planning Statement.

As presently written, a proponent cannot propose a project on such land at all, even if they limit the project proposal to those marginal soils and areas deemed Rural by the local municipality, because "the lands" in the MSR is defined by the PIN which covers the entire land parcel.

In summary, presently the presence of *any* PAA land use designation on *any* portion of the land (the entire parcel) disqualifies *all* of the land from solar development, no matter how small the Agricultural portion actually is, and no matter if the municipality would otherwise agree to the siting of a solar project on that parcel of land, outside of the PAA portion.

We ask and recommend that the IESO take reasonable steps to update the prescribed form for solar to allow landowners and local municipalities to make their own decision as to whether joint PAA and non-PAA land parcels can still be supported for a proposed solar project in such unique joint-purpose parcels of land.