

Feedback Form

Long-Term 2 RFP – June 16, 2026

Feedback Provided by:

Name: Eric Muller

Title: Director of Policy for Ontario

Organization: Canadian Renewable Energy Association (CanREA)

Email: [REDACTED]

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](#)

Regarding the proposed requirement for Proponents to submit a non-binding Supply Chain Disclosure Plan for informational, planning and policy development purposes only, CanREA has no objections to the proposal.

Regarding the consideration to potentially include a Canadian Content Incentive in the LT2 Window 2 Energy and Capacity RFPs, CanREA submits that this is premature given current supply chain realities of the competing technology types and should be considered in a future LT2 RFP window, such as Window 3. Should the IESO and government decide to move forward with a Canadian Content Incentive for LT2 Window 2, CanREA would recommend that the IESO and government consider setting a lower minimum percentage threshold than the LLT RFP to appropriately reflect: (1) near-term procurement timeline needs and (2) current supply chain realities of the technology types participating in the LT2 procurements.

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?

CanREA and its members have significant concerns regarding the IESO's consideration of removing the DARTA mechanism from the LT2 Window 2 contract. This proposed removal would introduce unmanageable risk for variable generation (VG) Proponents and jeopardize the financeability of VG projects under the contract, as outlined below.

Removing the DARTA mechanism would shift 100% of day-ahead to real-time (DART) settlement risk onto Proponents. For VG resources such as wind, solar, and run-of-river hydro, Proponents are unable to manage this risk due to inherently variable weather patterns. Accumulating one or two years of data in the renewed market does not improve this ability; the risk remains unmanageable for VG resources. Placing 100% of DART risk on Proponents with VG resources would ultimately result in increased costs for Ontario ratepayers.

Furthermore, CanREA's developer and lender members have expressed serious concerns that the proposed removal of the DARTA mechanism would introduce a level of risk that would render the LT2 Window 2 contract unfinanceable for VG resource projects.

CanREA strongly recommends that the DARTA mechanism included in the LT2 Window 1 contract continue to be included in the LT2 Window 2 contract.

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?

CanREA and many of its members are concerned regarding the consideration of the IESO to introduce exclusion criteria for future procurements that would prohibit participation by any Proponent, including entities that Controlled the Proponent, deemed by the IESO not to be in good standing due to actions considered inconsistent with good faith conduct during a procurement process.

As a matter of principle, CanREA strongly objects to any proposed retroactive introduction of new rules following the conclusion of procurement processes where such rules have a material adverse impact on Proponents. Such practices undermine investor confidence in Ontario's energy sector, reduce robust competition in procurements, and ultimately result in increased costs for ratepayers.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Transmission Availability and Deliverability

Detailed and timely transmission availability and deliverability information continues to be critical for the future success of the LT2 Window 2 procurements.

CanREA acknowledges that the IESO has committed to publishing updated deliverability guidance no later than September 2026. We strongly encourage the IESO to expedite this work – to publish it in July or August 2026 – as this information is critical for siting and other pre-development activities conducted by Proponents.

Similarly, should the IESO decide to encourage or incent projects in particular areas of the province, via locational rated criteria, maps/visuals or other means, CanREA recommends that this information be provided at the same time as the above updated deliverability guidance, on an expedited basis.

With project proposals expected to be due in Q2/Q3 2027, the above detailed, clear and timely information will be critical for Proponents as they conduct siting and other pre-development activities in Summer and Fall 2026.

Dual-Use Agrivoltaics in Agricultural Areas

CanREA recommends that the IESO and government revisit the current direction that prohibits ground-mount solar projects in prime agricultural areas as defined in municipal official plans.

The current prohibition rests on the premise that solar generation and farming are mutually exclusive uses of land. Dual-use agrivoltaics has overtaken this premise: by co-locating solar with active grazing or crop production, both uses can occur on the same land at the same time, providing significant benefits to farmers and communities.

There are several real-world Ontario project case studies and academic research studies from Western University's Ivey Business School which clearly outline the benefits of dual-use agrivoltaics, including higher yields for a range of crops, protection from excess sun and hail, improved water conservation, and increased farm revenue alongside renewable generation.

CanREA recommends that dual-use ground-mount solar agrivoltaics projects be made eligible to be located in prime agricultural areas, excluding specialty crop areas, as defined in municipal official plans. This change will help to protect prime farmland, keep land in food production, provide farmers with a critical new revenue stream, and advance the province's electricity goals at the same time.