

Feedback Form

Long-Term 2 RFP – June 16, 2026

Feedback Provided by:

Name: Don Richardson

Title: Chief Executive Officer

Organization: Minogi Corp. (A Mississaugas of Scugog Island First Nation company)

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

Supply Chain Disclosure Plans

Minogi supports requiring proponents to submit Supply Chain Disclosure Plans for informational and policy development purposes. Such disclosure can provide valuable information to government and system planners regarding emerging supply chain opportunities, workforce requirements, manufacturing gaps, First Nation rights-holder procurement opportunities, and potential areas for future industrial policy. However, disclosure requirements should remain practical and proportionate and should not create unnecessary administrative burden.

Canadian Content Incentives

Minogi believes that introducing Canadian content incentives may be appropriate over time but recommends caution in LT2 Window 2. While Ontario, Canada and First Nations are seeking to strengthen Canadian-based manufacturing and supply chains, key components used in solar, wind and battery projects continue to be sourced globally. Imposing aggressive content thresholds too early risks:

- reducing competition;
- increasing bid prices;
- limiting available technologies;
- delaying project development; and
- reducing procurement efficiency.

Recommendation

If the IESO proceeds with a Canadian Content Incentive, we recommend:

- establishing lower and technology-specific thresholds;
- recognizing majority-owned and controlled Ontario-based First Nation rights-holder-owned businesses as eligible Canadian suppliers;
- providing flexibility where equivalent domestic alternatives do not yet exist; and
- avoiding penalties for factors outside the control of project proponents.

In addition, the IESO should consider providing additional recognition where projects demonstrate meaningful Ontario-based participation within Canadian supply chains, including the following Ontario-based entities if they are listed in the federal Indigenous Business Directory (IBD) or similar:

- majority First Nation-rights-holder-owned construction firms;
- majority First Nation rights-holder-owned environmental service providers;
- majority First Nation rights-holder-owned logistics and transportation companies; and
- majority First Nation rights-holder-owned operations and maintenance providers.

Such an approach would support both domestic economic development and First Nation economic reconciliation objectives.

Increased Proposal Fees

The IESO proposes increasing the maximum proposal submission fee from \$10,000 to \$25,000. Minogi recognizes that procurement evaluation costs have increased and that proposal fees should reflect reasonable cost recovery principles. However, we are concerned that significantly higher proposal fees may disproportionately affect First Nation proponents which often face greater capital constraints than large utilities and institutional developers.

Recommendation

The IESO should consider:

- a graduated fee structure based on project size;
- reduced fees for First Nation-owned projects;
- reduced fees where projects exceed a minimum First Nation equity threshold; or
- partial fee refunds for qualified but unsuccessful proposals.

These measures would support competition while still enabling reasonable cost recovery.

E-PPA Design: DA to RT Adjustments

Minogi has significant concerns regarding the potential removal of DARTA from LT2 Window 2. While the IESO notes that the mechanism was originally intended as transitional and that additional market history is now available, the existence of historical market data does not eliminate inherent production uncertainty associated with variable generation resources.

For wind and solar facilities in particular:

- weather variability remains largely uncontrollable;
- forecasting accuracy has practical limits;
- lenders continue to evaluate merchant and settlement risks conservatively; and
- transfer of 100% DA-to-RT settlement risk could materially affect project financeability.

The likely outcomes of removing DARTA would be:

- higher financing costs;
- larger risk premiums embedded in bids;
- reduced competition; and
- higher costs for Ontario consumers.

Recommendation

The IESO should maintain the existing DARTA mechanism for LT2 Window 2. If the IESO chooses to reduce DARTA protection over time, it should do so through a phased approach that allows developers, investors, lenders and First Nation partners to adapt gradually as Ontario's day-ahead market matures.

Locational Rated Criteria

Minogi supports continued use of locational rated criteria where such criteria:

- reflect measurable system benefits;
- improve deliverability; or
- address regional reliability needs.

However, locational incentives should remain transparent, objective and technology neutral.

Recommendation

The IESO should consider providing rated criteria for projects that:

- leverage existing and planned transmission infrastructure, especially where First Nation transmission equity partnerships are embedded;
- provide benefits to constrained demand centres;
- support regional and First Nation economic development objectives; and
- include significant First Nation rights-holder ownership.

Ontario has demonstrated through LT1, LT2 and other procurements that First Nation partnerships can meaningfully improve project certainty, community acceptance and long-term economic outcomes. These benefits should be recognized within procurement design.

Exclusion Criteria

Minogi understands the IESO's interest in maintaining procurement integrity. However, we have concerns regarding the proposed exclusion framework as currently described. The consequences of a three-year or longer procurement prohibition could be significant and may affect:

- investors;
- lenders;
- First Nation partners;
- host communities; and
- other stakeholders that may have had no involvement in the underlying issue.

Recommendation

Any exclusion framework should include:

- clearly defined and objective criteria; and
- proportionality between the alleged conduct and resulting sanction.

Predictability and procedural fairness are critical to maintaining investor confidence.

General Comments/Feedback

Minogi supports the IESO's continued use of competitive procurements to meet Ontario's growing electricity needs and appreciates the opportunity to provide feedback on LT2 Window 2 procurement design elements.

We encourage the IESO to ensure that any modifications to procurement design continue to support:

- competition and affordability;
- project financeability;
- economic participation and equity ownership of First Nation rights-holder communities;
- timely delivery of new generation resources; and
- the development of Ontario and Canadian supply chains.

Given Ontario's forecast electricity demand growth, procurement design should prioritize attracting the broadest possible range of qualified projects while avoiding unnecessary barriers that could increase costs or delay project development.

Transparency and Information Disclosure

Minogi supports greater transparency regarding procurement outcomes provided confidential and commercially sensitive information remains protected. Publication of aggregated information concerning technology mix, project sizes, regional distribution, procurement participation levels, and non-selection categories could enhance market understanding and improve future proposal quality.

However, disclosure should avoid revealing information that could:

- compromise future competition;
- expose proprietary development strategies; or
- indirectly identify specific unsuccessful projects.

The IESO appears to be moving in this balanced direction, which we support.

Communication and Announcement Reporting

Minogi supports reasonable reporting obligations relating to project development status. However, the proposed requirement to report planned public communications should be narrowly tailored.

Many projects involve:

- First Nation governments;
- First Nation economic development corporations;
- municipal governments;
- private sector partners;
- lenders; and
- regulatory agencies.

Public communications often arise from these relationships and may evolve quickly.

Recommendation

The reporting requirement should:

- avoid creating approval requirements for communications;
- avoid creating additional administrative burden;
- respect Indigenous governments' independent communications authority; and
- be limited to major project announcements rather than routine engagement activities.

Conclusion

Ontario's electricity demand growth requires procurement frameworks that are financeable, competitive, efficient and capable of attracting substantial private and First Nation capital. LT2 Window 2 should seek to expand - not narrow - the pool of viable projects and investment partners.

Minogi encourages the IESO to maintain procurement flexibility, preserve project financeability, recognize the growing role of First Nation ownership, and continue refining procurement design in collaboration with industry, First Nation partners and other parties.