

# Feedback Form

## Long-Term 2 RFP – August 20, 2026

### Feedback Provided by:

Name: Ritesh Talati

Title: Senior Analyst

Organization: Atura Power

Email:

Date: September 4, 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 August 20<sup>th</sup>, 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](mailto:engagement@ieso.ca) by September 4, 2026.**

September 04, 2026

Via Email: [engagement@ieso.ca](mailto:engagement@ieso.ca)

Independent Electricity System Operator  
(IESO) 120 Adelaide St West – Suite 1600  
Toronto, ON M5H 1T1

## **RE: Atura Power Comments on the LT2 Window 2 Draft RFP and Contract**

Atura appreciates the opportunity to provide feedback on the LT2(e) Window 2 draft RFP and Contract. As the IESO continues to refine the procurement design, early clarity on key design items will support competitive bid formation, realistic project development timelines and executable proposals.

### **1. Window 1 Results and Price Curve Transparency**

The LT2(e-1) results indicate that the energy stream procured approximately 2.37 TWh, representing about 79% of the target. Atura understands that the IESO intends to publish LT2(e) Window 2 targets in the next round of draft materials and encourages the IESO to indicate how the unprocured Window 1 volume has been considered in setting those targets.

Atura supports the IESO's proposal to publish anonymized price curves after procurement completion, provided bidder confidentiality is preserved. Releasing aggregated price information by stream would improve market transparency, support future bid formation, and strengthen confidence in procurement outcomes without revealing commercially sensitive project-specific information.

### **2. Repowering Framework**

Atura supports a repowering pathway that extends the life of existing assets, uses existing transmission infrastructure and reduces development and permitting risk. Atura encourages the IESO to provide additional guidance on the types and extent of work that will qualify as repowering, including how proponents and Independent Engineers should distinguish life-extension work, upgrades and redevelopment.

The proposed structure requires repowering projects to clear an unknown New Build price threshold while competing within a Repowering Cap that has not been established. The IESO should clarify how the combined offer stack will be applied in practice, including whether partial quantities, tiebreakers or other rules will apply where adding the next-ranked proposal would cause the New Build Target or Repowering Cap to be reached or exceeded.

The IESO should also publish the Repowering Cap methodology and an indicative range before final RFP issuance, including how it will assess the maximum acceptable concurrent outages from eligible existing facilities. Given that the reliability impact of outages can vary by location, resource type and

facility characteristics, the IESO should clarify whether locational constraints, resource type and outage timing will be reflected in determining the cap.

### 3. Locational Rated Criteria and Deliverability

Locational criteria directly influence site selection, land commitments, Indigenous and municipal engagement, and interconnection investment. The IESO should publish the final scoring framework and supporting planning rationale, and draft deliverability guidance at least one year before the offer submission date, so proponents have sufficient time to make related development and investment decisions.

The criteria should reflect resource quality, existing infrastructure, planned transmission reinforcements and long-term energy adequacy. The framework should recognize the long-term system value of high-quality wind resources, including Northern Ontario wind, where those resources contribute to energy adequacy and resource diversity.

The IESO should also identify relevant transmission constraints and explain how upgrades expected before the 2032 commercial operation date will be reflected in deliverability assessments. The IESO's timeline indicates that draft deliverability guidance will be provided by September 2026, with final guidance expected by July 2027. Given the importance of deliverability guidance to site selection, Atura encourages the IESO to ensure the draft guidance contains sufficient detail for proponents to assess material deliverability risks before advancing project development. Changes between the draft and final guidance that increase deliverability capacity, including through new transmission lines, upgrades, or other system improvements, would be appropriate. However, changes that materially reduce deliverability after proponents have relied on the draft guidance should be limited, as they may create development and investment risk.

### 4. Indigenous Participation

During the public session, it was identified that section 2.2(h), which addressed Indigenous participation in LT2(e- 1), appears to have been deleted from the LT2(e) Window 2 draft RFP. Atura requests that the IESO confirm whether this deletion was inadvertent and, if so, confirm that the Indigenous participation framework for Window 2 will remain consistent with the framework applied in Window 1. Atura supports meaningful Indigenous participation and partnerships in energy development. Early certainty on the applicable framework is important for proponents and Indigenous communities as they assess participation opportunities, negotiate durable commercial arrangements, secure approvals and complete financing. Requirements should be clear, consistently applied and structured to reward substantive participation without creating avoidable execution risk.

## 6. DARTA Protection Threshold

Atura has concerns with the proposed reduction of the DARTA protection threshold from 85% to 60%. The IESO has acknowledged that removing DARTA would transfer risk to proponents; however, the underlying source of that risk remains unchanged. Day-Ahead to Real-Time price deviations are often driven, in part, by differences between forecasted and actual system conditions that generators are not positioned to control. Lowering the threshold increases merchant exposure for renewable projects. Given the IESO's system-wide visibility and role in forecasting, Atura encourages the IESO to restore the threshold to 85% so that the contract continues to reflect an appropriate allocation of forecasting risk.

## 7. Capacity Procurement Design

Atura notes that the IESO is continuing to assess the LT2(c-2) capacity stream and looks forward to providing comments once draft capacity documents are posted. Atura supports the IESO further examining the capacity stream to appropriately value the reliability contribution of different resource types. In advance of that release, Atura offers the following preliminary comments in support of the IESO's ongoing development of the capacity stream design.

Atura encourages the IESO to consider establishing a separate non-storage stream within the capacity procurement, consistent with the approach used in LT1. The separate non-storage stream used in LT1 provided a simple procurement structure that was effective in supporting the procurement of resources with the operating characteristics required to meet capacity needs. Adopting a similar approach for LT2(c-2) would allow the IESO to value the capacity contribution of different resource types in a direct and practical manner, rather than introducing more complex mechanisms intended to achieve the same outcome. Separate capacity procurement targets for storage and non-storage resources could then be used to guide the quantity procured from each stream and ensure the final procurement outcome reflects the system's capacity needs.

## 8. Canadian Content Requirements

Atura supports the IESO's objective of promoting Canadian content and domestic supply chain participation. To make the requirements commercially executable, the IESO should finalize eligibility, measurement, reporting and compliance rules early enough to support credible sourcing strategies, bid pricing and financing. Clear requirements will help avoid proponents either pricing unnecessary contingencies into bids or accepting risks that cannot reasonably be managed at the time of bidding.

Atura is supportive of an LLT-style Supply Chain Disclosure Plan, provided it remains indicative and non-binding at the proposal stage. Given long development and procurement horizons, OEM selection, suppliers, manufacturing locations and country-of-origin treatment may change before final procurement. The IESO should preserve flexibility for legitimate sourcing changes, provided committed Canadian Content Requirements are still met, and should clarify how Canadian content is calculated where Canadian-assembled equipment includes imported components.

Atura also recommends that the IESO address material tariff and trade-policy changes after proposal submission, including tariffs, counter-tariffs, surtaxes and changes in country-of-origin treatment. These risks can materially change project costs after bid pricing is established and may otherwise require proponents to price contingencies into their offers. The IESO should consider a threshold, shared exposure or financial realignment mechanism for material post-bid changes and maintain proportionate Canadian content remedies tied to the actual shortfall rather than a more punitive liquidated damages regime. The framework should also distinguish deliberate non- performance from legitimate supply chain disruption, supplier availability constraints, or trade-policy changes outside a proponent's control.

Atura appreciates the IESO's continued engagement on the LT2(e) Window 2 procurement and encourages the IESO to provide clear direction on the outstanding design matters to support informed development and bid decisions. We look forward to continued collaboration with the IESO and stakeholders as the procurement design is further refined.

Thank you for considering our  
comments. Yours truly,



**Ritesh Talati | Senior Analyst | Atura Power**  
**1415 Joshuas Creek Drive Unit #200, Oakville, ON L6H 7G4**

