



**ROBINSON
GLOBAL
MANAGEMENT**

Medium-Term 2 – Capacity Stream (MT2(c) RFP) and Medium-Term 2 - Energy Stream (MT2(e) RFP)

FAIRNESS ADVISOR'S REPORT

RFP Issued: November 15, 2024

RFP Deadline: January 9, 2025, at 3:00 P.M. (EPT)

Report Issued: November 11, 2025

Report Submitted to: Supervisor Resource Acquisition
Resource Development and Procurement
Independent Electricity System Operator

Report Submitted by: Senior Fairness Advisor
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November 11, 2025



Ms. Sheri Bizarro
 Supervisor Resource Acquisition
 Resource Development and Procurement
 Independent Electricity System Operator
 120 Adelaide Street West, Suite 1600
 Toronto, Ontario, Canada
 M6H 1T1

Re: Fairness Advisor Report to the Independent Electricity System Operator for the Request for Proposals for the Procurement of Medium-Term 2 – Capacity Stream and Medium-Term 2 - Energy Stream

Dear Ms. Bizarro,

Robinson Global Management Inc. ("RGM") was retained as the Fairness Advisor for the above-mentioned procurement process on July 2, 2024, to oversee the Medium-Term 2 Capacity Stream and Energy Stream RFP procurement processes administered by the Independent Electricity System Operator ("IESO").

Fairness Advisor Report Purpose and Background

1. Fairness Advisor Scope

We were engaged to provide Fairness Advisory Services to support procurements related to IESO's Request for Proposal procurement processes for the Medium-Term 2 Capacity Stream and Energy Stream from the development of solicitation documents until contract execution.

Our role has been to ensure that the IESO follows the relevant procurement processes and laws and to ensure that all potential proponents are treated consistently and fairly. To date, RGM has monitored the RFP Development, Open Period, Evaluation, and the Notification and Debriefing processes of the procurement.

This letter details our summarized fairness findings for the RFP procurement process we monitored. Neither RGM nor the individual author(s) of this report are responsible for any conclusions that may be drawn from this opinion. For further detail on the above-mentioned process, we recommend that communication be sought from the IESO's Resource Acquisition contact directly, whom RGM also reported to.

In completing this report, we took the IESO's Ministerial Procurement Directives, IESO's internal policies and procedures, Ontario Public Sector Procurement Directive, Canadian Free Trade Agreement (CFTA), Comprehensive Economic and Trade Agreement (CETA), Canada-European Union (EU) policies and procedures and the provisions of the RFP as a standard against which to audit the process.

We have no objections to the recommendations made by the IESO's Resource Acquisition and Contract Management Department as it relates to the Selected Proponents that have been selected by the IESO. Our monitoring and advice were in the capacity as Fairness Advisor and strictly limited to our responsibilities and deliverables listed on the following page.

2. The FA's responsibilities and deliverables for the MT2(C) RFP and MT2(E) RFP included:

1. Advising on, and monitoring, the procurement process for the acquisition of resources required as part of the procurement.
2. Performing activities including (but not limited to) the following tasks:

- a. Supporting the procurement process from design to contract award – reviewing materials and providing advice and comments on the procurement documents and processes, including the form of agreement; evaluation process; and selection criteria.
- b. Participating in all aspects of the procurement process, including (but not limited to):
 - i. Monitoring communications between the IESO and potential proponents;
 - ii. Attending any information sessions / webinars that the IESO may hold for potential proponents;
 - iii. If applicable, monitoring and facilitating any confidential individual information sessions between proponents and the IESO;
 - iv. Monitoring responses to inquiries from interested parties or potential proponents during formal question and answer periods;
 - v. Participating in orientation and training sessions for evaluations; and
 - vi. Monitoring the evaluation process
 - vii. Observing the debriefings with unsuccessful proponents.
- c. Providing a written report that attests to the fairness observed during the entire procurement process (the “Fairness Report”) and submit to a designated IESO recipient after the conclusion of the evaluation process.
 - i. The format of the Fairness Report, including the determination of key subject areas, will be mutually agreed to between the IESO and FA.
 - ii. The Fairness Report will be completed independently by the FA and submitted to a designated IESO recipient upon completion. For certainty, to maintain the integrity of the engagement, the FA will not seek input from the IESO and the IESO will not provide guidance or suggest edits to the Fairness Report at any time.

3. *Medium-Term 2 RFPs Purpose and Background*

Ontario’s electricity system is entering a period of emerging needs driven by multiple factors: the retirement of the Pickering Nuclear Generating Station, the refurbishment of other nuclear facilities, increasing electricity demand from electrification and economic growth, and the expiry of existing supply contracts. To address these needs in a timely and cost-effective manner, the IESO developed the Resource Adequacy Framework, which provides mechanisms for securing capacity and energy resources to ensure ongoing system reliability.

The Medium-Term 2 Request for Proposals (MT2 RFP) was designed as a competitive procurement to acquire electricity capacity and energy from existing facilities capable of contributing to Ontario’s system needs:

- The **Capacity Stream (MT2(c))** targeted up to 3,000 MW of dispatchable capacity from existing facilities larger than 1 MW that are not subject to Ontario Energy Board rate regulation. Contracts were offered for a five-year commitment period starting May 1 in 2026, 2027, 2028, or 2029.
- The **Energy Stream (MT2(e))** sought to procure renewable and alternative energy (wind, biomass, landfill gas) through five-year contracts for facilities able to demonstrate reliable energy production.

The purpose of the MT2 RFPs were to competitively procure cost-effective capacity and energy services that balance ratepayer and supplier risk, ensure resource adequacy, and support Ontario’s evolving energy landscape with a diverse portfolio of generation sources.

MT2(C) RFP and MT2(E) RFP Development & Open Period Process

1. MT2(C) RFP and MT2(E) RFP Development

We were retained prior to the MT2(C) RFP (or “RFP”) development, well in advance of the RFP issuance. We were given multiple opportunities to review and provide meaningful fairness comment on the RFP documents and processes until they were issued to the market in draft and final versions. The IESO prepared Proposal workbooks for Proponents to allow them to submit fully compliant and complete Proposals which aligned with the RFP submission requirements. In our view this was both necessary and helpful for the Proponents and the IESO, in addition to the required forms and contract.

We were able to confirm that the IESO’s RFP documents outlined a process that was in our opinion procedurally fair, open, and transparent, and that should it be followed, it would lead to the administration of the fair, open and transparent evaluation results.

2. MT2(C) RFP and MT2(E) RFP Open Period

The RFP was issued on November 15, 2024, and the Amended Proposal Submission Deadline was January 16, 2025, at 3:00:00 pm EPT. The RFP was in the market, excluding weekends and holidays for forty-two (42) business days or sixty-three (63) calendar days. This period represented the amount of time that the Proponents were provided to understand the RFP requirements, respond to, and submit Proposals to the IESO through the established specified IESO email MT2.RFP@ieso.ca.

Milestone	Date
RFP Issued:	November 15, 2024
Registration Period:	September 19 – October 3, 2024
Qualified Capacity Notification:	October 25, 2024
Proponent Questions Deadline:	December 4, 2024
Addenda Deadline:	December 23, 2024
Amended Proposal Submission Deadline:	January 16, 2025, at 3:00 P.M. (EPT)
Notification of Selected Proponents:	June 16, 2025

3. Questions and Addenda

The RFP documents indicated that Proponents should review and present any questions by the Question and Comments Deadline on December 4, 2024. The Proponents presented questions throughout the engagement and open period processes, which resulted in the IESO issuing two (2) questions and answers (Q&A) batch releases representing a total of 41 questions being asked and responded to. The final Q&A was released by the addendum deadline, December 23, 2024, which was sixteen days before the Proposal Submission Deadline which exceeds the established best practice of at least one five (5) business days.

All Q&A’s and addendums were reviewed by us, the Fairness Advisor as prepared by the IESO and there were no matters of fairness to note in our oversight of this process or the communication issued.

4. Medium-Term 2 RFPs Frequently Asked Questions, Key Feedback and IESO Responses

Since October 1, 2024, the IESO has maintained an ongoing posting of Frequently Asked Questions (FAQs) for the Medium-Term 2 procurement processes. FAQs were issued clearly and transparently based on the section and process of the RFP that they were in reference to. This allowed the information to be reviewed and understood with a greater level of diligence and clarity. All Proponents had access to and the benefit of the responses in this document posted on the IESO’s procurement webpage, however only addenda issued in the RFP Open Period process were able to amend the RFP documents, which was made clear.

5. **MT2(C) RFP and MT2(E) RFP Transparency**

The RFPs stated the process overview, communication protocols, proposal evaluation process, specified terms and conditions, the process and submission timeline information, required prescribed forms the applied glossary of terms, as required for transparency. The RFPs further stated the assessment factors of each evaluated criterion, and any additional processes in accordance with the RFP documents. The transparency in the RFP documents ensured that all Proponents had the clarity required to review whether their Proposals could satisfy the RFP requirements prior to submission.

Where there were pass/fail requirements for all mandatory requirements evaluation sections, these were disclosed with a clear indication when such pass/fail tests would be applied, and the impact that would be applied if a Proponent failed to satisfy any of them.

Our Fairness Advisor was able to confirm that all requirements remained unchanged post RFP closing.

MT2(C) and MT2(E) RFP Evaluation Processes

1. **MT2(C) RFP Closing**

The MT2(C) RFP Proposal Submission received thirty-three (33) Proposal Fees received by the deadline, however, only thirty-two (32) Proposal submissions were made. Thirteen (13) proposals were Capacity Stream responses, and Nineteen (19) Proposals were Energy Stream responses. No proposals were unsuccessful. The single response that did not move forward was held back as it did not contain a material proposal, only fees.

Otherwise, all other Proposals that passed the IESO's Intake Process proceeded to Stage 1 – Completeness Requirements.

2. **Stage 1 – Completeness Requirements (PASS/FAIL)**

Thirty-two (32) Proposals were reviewed to deem that they satisfied the Stage 1 – Completeness Requirements; thirteen (13) proposals were Capacity Stream responses, and nineteen (19) proposals were Energy Stream responses. In accordance RFP section 4.1, each Proposal passed or failed this Stage 1 depending on whether the Proposal was complete and contains all documents, forms and declarations required.

“All Proposals must be complete in all respects at the time of submission. If a Proposal would otherwise fail the Stage 1 completeness review as a result of a manifest error or deficiency on a submitted Prescribed Form, such as a missing date, name, signature or a typographical error (and not, for certainty, a failure to pay the Proposal Fee, a failure to deliver the Proposal Security as required by Section 3.7 or a failure to submit a Prescribed Form in its entirety that is required by Section 3.7), the IESO may, in its Discretion, issue a rectification notice identifying a perceived deficiency and in such case will provide the Proponent a single opportunity to rectify the perceived deficiency and submit the applicable corrected or completed materials within the time period specified by the IESO in such notice.”

This evaluation was completed by qualified IESO procurement staff, who were tasked with evaluating the completeness review and assessing matters for clarification when raised throughout the process, with advice from the approved internal procurement Supervisor, with consultation from the Legal Advisor, and us, the Fairness Advisor as needed.

There were three (3) Capacity Stream Proposals that were unsuccessful. There were no Energy Stream Proposal failures identified. As a result of the above confirmed matters, the ten (10) Capacity Stream Proposals, and nineteen (19) Energy Stream Proposals successfully passed the Stage 1 evaluation process and proceeded to Stage 2 – Mandatory Requirements.

We reviewed all failures and passes identified by the IESO's evaluation team from a fairness perspective and were able to verify all Stage 1 results.

3. Stage 2 – Mandatory Requirements (PASS/FAIL)

This evaluation was conducted by qualified IESO staff that formed the evaluation team. The evaluation team members were selected and trained to ensure that they had the expertise to critically review, understand, and evaluate the Proposals against the pass/fail criteria provided in the RFP documents.

In accordance with RFP section 4.2, in the Stage 2 process, each Proposal passed or failed depending on whether it satisfied the following information requirements: (a) the Proposal is for a Qualified Facility; and (b) the Monthly Contract Capacity is equal to or less than the Qualified Capacity as set out in Section 2.1(b). If the Proposal met the Mandatory Requirements, it proceeded forward in the evaluation process.

At the completion of the Stage 2 evaluation process, all ten (10) Capacity Proposals and nineteen (19) Energy Proposals were deemed successful and proceeded to Stage 3 in the evaluation process.

We reviewed all failures and passes from a fairness perspective and were able to verify all Stage 2 results.

4. Stage 3 – Review of Economic Bid Statement

Proposal Prices were ranked for the Stage 4 selection process by the IESO. The evaluation was undertaken by the IESO procurement team. We reviewed and attended the live evaluation pricing review during this stage, and from a fairness perspective we were able to verify all Stage 3 results.

5. Stage 4 – Selection (capacity-based ranking, up to 3,000 MW)

In accordance with RFP Section 4.4, "the Proposals on the Preliminary List other than a Bulk Proposal were processed and added to the "Offer List" in order until such point where the selection of the next ranking proposal on the Preliminary List will result in the aggregate Maximum Contract Capacity of Proposals on the Offer List being equal to or greater than eighty percent (80%) of the aggregate Maximum Contract Capacity of all Proposals other than a Bulk Proposal on the Preliminary List (such Proposal, the "Target Marginal Proposal")."

The process undertaken by the IESO procurement team, with advice from senior management on the competitiveness and market acceptability of pricing. During this stage the IESO exercised its reserved right under section 5.10(k) of the RFP, which allows the IESO to reject any or all Proposals at the IESO's discretion. The IESO's exercise of its reserved right, in this case, was driven by a practical view that the Proposal Price would not represent a cost-effective outcome for ratepayers. As a result, one (1) Capacity Proposal was removed from selection in Stage 4.

Minor Qualification:

We recommend that in future procurements, the IESO share its intent to conduct a market pricing acceptability review transparently during the open period. This would allow Proponents to understand how and when such reviews will be applied and adjust their offers proactively.

The FA observed evaluation training, ensured consistent application of evaluation criteria, and reviewed pass/fail determinations and price submissions for fairness.

On May 8th, 2025, twenty-eight (28) contracts were offered ((9) Capacity and (19) Energy Proposals. However as of June 6th, twenty-seven (27) contracts were returned and completed, but one Proponent opted not to sign back their offered contract as they did not follow the Duration Capability requirements and therefore could not deliver the four (4) hours of Contract Capacity needed.

Therefore, with the reduction of one (1) proposal that could not fulfil a contract offered, eight (8) Capacity Proposals and nineteen (19) Energy Proposals were selected to proceed forward into the contract finalization process with the IESO following due diligence exercises and the IESO's use of its reserved rights under section 5.10 of the MT2(c) RFP.

Stream	# of Executed Contracts	Max Contract Capacity
Capacity	8	2006.14 MWs
Energy	19	994.97 MWs

We reviewed and were able to verify all Stage 4 results from a fairness perspective.

MT2(C) RFP and MT2 (E) RFP Evaluation Process Methodology

1. Evaluator Training Session

Prior to the start of evaluating Proposals, the IESO evaluation team received a mandatory detailed evaluation training, provided by the IESO's procurement representatives and Fairness Advisor. The training covered all aspects of the evaluation process and how to execute the evaluators' roles and responsibilities effectively and fairly to maintain the integrity of the process planned. The evaluators were briefed thoroughly on the best practices with respect to confidentiality of Proposals; conflict of interest; undue influence; secure management of the Proposals; and preparing their individual evaluations and comments in conformance of an approved evaluation workbook and guideline prepared for each evaluation stage that aligned with the RFPs evaluation requirements and processes.

2. Conflict of Interest & Confidentiality Management

We are not aware of the existence of any conflict of interest or a breach of confidentiality occurring at any point during the evaluation process. All perceived matters were brought to our attention, reviewed, assessed, and resolved if and where present.

3. Undue Influence Management

No evaluator or other individual participant in the evaluation process, exerted undue influence over the process. Each evaluation stage was completed in a sequential order, as presented in the RFP documents, and with the observance of IESO's Procurement representatives, Legal Advisor, and us, the Fairness Advisor. All key evaluation process decisions were made by more than one person, verified by at least one other person, and documented. We reviewed all decisions through our invitation by IESO to conduct live fairness monitoring of the evaluation process. This allowed the IESO to ensure that decisions had the benefit of verifications and validation by others external to itself.

4. Scoring Methodology Relating to Intake Receiving Process, Stage 1 Completeness and Stage 2 Mandatory Requirements Evaluations

The evaluations occurred between January to April 2025. The evaluation team completed the Stage 1 and Stage 2 evaluations using the established best practice consensus two - step method: firstly, each evaluator, working alone, reviewed, and evaluated with supporting comments, each Proposal workbook in its entirety for each evaluation stage; secondly, the evaluators met at a group consensus meeting, for each evaluation stage.

During the evaluation consensus meetings held on each of Stage 1 and 2, we witnessed the evaluators discuss their individual findings actively and thoughtfully. While largely relying on their initial individual comments, the evaluation team discussions which occurred during each consensus meeting, strived to, and successfully arrived at a consensus evaluation assessment and comment for each assessment criterion of each evaluation stage. The evaluation team which completed their duties throughout Stages 1 and 2 for each stream of Proposals (Capacity and Energy).

Evaluators were given an ability to challenge comments or opinions with their own written comments and to engage in a healthy discussion on any evaluation item with the goal of aligning the evaluation comments and decisions for each Proposal to the RFP evaluation requirements. All discussions were respectful and informed, as evaluators were prepared for each and every meeting, as were the IESO Procurement representatives and the supporting advisors, where needed. Each meeting within each evaluation stage was logistically consistent and maintained a consistent and full compliment of the evaluation participants so that each Proposal received an equivalent level of consideration by the same group of persons.

The evaluation team ensured that their evaluation aligned with the disclosed evaluation and Proposal requirements, Proposal evaluation methodology, glossary of terms disclosed, and maintained the disclosed criteria throughout the processes, as stipulated in the RFPs.

All evaluation results were transparently verified by IESO Procurement representatives, their Legal Advisor, and us, the Fairness Advisor, who monitored the consensus meetings to ensure accuracy.

Final Procurement Results

Capacity Stream (MT2(c)):

- 8 selected proponents (Atlantic Power, Bay Power, GTAA, Iroquois Falls, Kap Power, Kingston Cogen, London District Energy, OPG Lennox)
- Total Awarded Capacity: 2,006.14 MW.
- Weighted Average Fixed Capacity Payment: \$598.27/MW-business day
- Contract start dates: range from May 1, 2026, to May 1, 2029

Energy Stream (MT2(e)):

- 19 selected proponents/projects across wind, biomass, and landfill gas (e.g., Acciona Ripley, Brookfield Prince I/II, Kruger Port Alma, Wolfe Island, Erie Shores, etc.)
- Total Awarded Capacity: 994.97 MW.
- Weighted Average Fixed Price: \$79.55/MWh
- Contract start dates: range from May 1, 2026, to May 1, 2029

Fairness Advisor Attestation

Summary Fairness Findings

Based on our oversight of the MT2(c) and MT2(e) RFP processes, Robinson Global Management Inc. concludes that The Independent Electricity System Operator (IESO) conducted the Medium-Term 2 procurement processes in a manner that was fair, open, consistent, and transparent. We have no objections to the IESO's recommendations regarding Selected Proponents. The results confirm that the procurement achieved competitive outcomes, awarding contracts across a diverse set of proponents, technologies, and geographies, while maintaining compliance with all fairness, transparency, and procedural requirements.

Sincerely,



Andrea Robinson, B.A, LL.M., Q. Arb., PMP.
Senior Fairness Advisor, Robinson Global Management Inc.

cc: Don Solomon, B.A., CERT. ARCH.TECH.
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