



Corporate Power Purchase Agreements Framework Backgrounder and FAQs

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All capitalized terms used herein, unless otherwise stated, have the meanings ascribed to the non-capitalized versions of the same terms in Ontario Regulation 429/04 or as defined in the Prescribed Forms.

Document Change History

Version	Reason For Change	Date
1	C-PPA Framework Backgrounder & FAQs	2025/10/08

1. Overview and Backgrounder

In June 2025, [Ontario Regulation 429/04](#) was amended to introduce a new regulatory framework for Corporate Power Purchase Agreements (C-PPAs), giving large electricity users a new way to support clean energy projects in the province. The framework aims to improve the economic viability of C-PPAs by enabling Class A market participants under the Industrial Conservation Initiative (ICI) program to potentially lower their peak demand factor (PDF) during the top five peak hours of a base period for Global Adjustment (GA) settlement purposes through agreements with eligible renewable generation facilities. This approach creates new revenue opportunities for generators and gives consumers more ways to be part of Ontario's clean energy transition through contracts with renewable projects in other locations.

For more information on the ICI program please visit the [IESO Settlement webpage](#).

The IESO ensures participants meet and maintain eligibility for C-PPAs, requiring market participants to provide confirmation of regulatory compliance.

1.1 Key Terms

Industrial Conservation Initiative (ICI): The ICI program was designed to incentivize eligible industrial and commercial customers to reduce their demand during peak periods in order to help the province defer the need for investments in new electricity infrastructure. Customers who participate in the ICI, referred to as Class A, pay GA based on their percentage contribution to the top five peak hours over a base period.

Peak Demand Factor (PDF): a Class A customer's percentage contribution to the top five peak hours over a 12-month base period (May 1 to April 30)

Base Period: 12-month period which lasts between May 1 to April 30 of the following calendar year. A customer's consumption and demand data during this period are used to determine if a customer is eligible to participate in the ICI program.

Adjustment Period: 12-month period which lasts between July 1 of the calendar year in which the base period ends June 30 of the following calendar year. If a customer chooses to participate in the ICI program for a given adjustment period, their monthly Class A global adjustment charges, during the adjustment period, will be calculated based on their PDF.

Class A: customers participating in the ICI. The term 'customers' refers to both IESO market participants and Local Distribution Company (LDC) consumers.

Class A Consumer: is an Ontario electricity consumer that is not a market participant, an embedded distributor, or a regulated consumer, received electricity from the same licensed distributor throughout the base period, had a maximum hourly demand in each month that averaged more than 5 megawatts over the base period, and did not supply more electricity to the distributor than it received.

Class A Market Participant: is an Ontario market participant that is not a licensed distributor or regulated consumer, was a market participant throughout the base period, physically supplies or withdraws electricity through the IESO-controlled grid, has a maximum hourly demand in each month that averages more than 5 megawatts over the base period, and withdraws more electricity from the grid than it supplies.

Global Adjustment (GA): the electricity bill component that covers the cost of building new electricity infrastructure, maintaining and refurbishing existing generation resources and covers the cost of delivering conservation programs in order to ensure adequate electricity supply over the long term in the province of Ontario.

Load Facility: Means a facility that withdraws electricity either from the distribution system of a licensed distributor or from the IESO-controlled grid.

Market Participant: means any company who is authorized by the market rules to participate in the IESO-administered markets or to cause or permit electricity to be conveyed into, through or out of the IESO-controlled grid.

Binding Date: means, in relation to an Eligible Purchase Agreement, the day on which the agreement first becomes binding on the Eligible Purchase Customer and the Eligible Generator who are the parties to the agreement.

2. Frequently Asked Questions

2.1 Eligibility

For detailed information on the eligibility requirements to participate in the C-PPA framework, please refer to the [Corporate Power Purchase Agreements Framework Guideline](#).

2.1.1 What is a market participant, and is a distribution-connected load or generator eligible to participate in the C-PPA framework?

A market participant is any entity authorized to participate in the IESO-administered wholesale electricity market.

Distribution-connected loads or generators may participate in the C-PPA framework, provided they are registered as market participants and are settled in the IESO-administered market.

For more information on the types of market participants, please refer to IESO's [Introduction to Ontario's Physical Markets](#) training guide.

To learn more about becoming a market participant, visit the IESO's [Connecting to Ontario's Power System](#) webpage.

2.2 Required Forms and Attestations

2.2.1 What is an attestation?

An attestation is a formal declaration confirming that the requirements of Ontario Regulation 429/04 have been met. The required C-PPA attestations must be submitted in the IESO-approved format and within the approved timeframe.

2.2.2 Who is required to complete the C-PPA attestations?

Eligible Purchase Customers and Eligible Generators are required to submit the C-PPA attestations to the IESO using the Prescribed Forms specified by the IESO within the specified time frame.

2.2.3 What do I need to submit?

Prior to the start of the first applicable base period, both the Eligible Purchase Customer and the Eligible Generator are required to submit the applicable C-PPA attestations to the IESO in the Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period, along with all associated forms, exhibits, workbooks and other materials by March 30th. This Prescribed Form is intended as a joint submission with distinct requirements for each party to attest to and includes the Generator Workbook and Purchase Customer Workbook by reference. This submission is required only once and does not need to be resubmitted in future base periods for the full term of the Eligible Purchase Agreement, assuming there are no changes to the arrangement requiring notification to IESO as per Ontario Regulation 429/04.

Within 15 days after the end of each applicable base period, the Eligible Purchase Customer and Eligible Generator are required to submit the applicable C-PPA attestations to the IESO in the Prescribed Form: Attestation for Eligible Purchase Agreement – Post-base Period.

2.2.4 Where do I find the required Prescribed Forms and Prescribed Form Materials?

The required Prescribed Forms and Prescribed Form Materials can be found on the [C-PPA website](#).

2.2.5 How do I complete the Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period and associated workbooks if I have more than one facility?

Each Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period, along with its associated workbooks, must relate to a single Eligible Purchase Agreement, one Eligible Purchase Customer, and one Eligible Generator. This Prescribed Form is a joint submission by both the Eligible Purchase Customer and the Eligible Generator, with separate sections for each party.

If multiple facilities are covered under the same Eligible Purchase Agreement:

- **Eligible Purchase Customer:** Submit a single Eligible Purchase Customer Workbook, with each worksheet tab dedicated to a specific load facility.*
- **Eligible Generator:** Submit a single Eligible Generator Workbook, with each worksheet tab dedicated to a specific Eligible Generation Facility.*
- **Prescribed Form:** Ensure the relevant sections of the attestation form reflect the applicable information for all included facilities.

*If additional worksheets are required to cover additional facilities, please submit a new workbook.

2.2.6 Where do I submit the Prescribed Forms and Prescribed Form Materials?

All Prescribed Forms and Prescribed Form Materials are required to be submitted electronically via email to the IESO at corporateppa@ieso.ca.

2.2.7 What is the deadline to submit the Prescribed Forms and Prescribed Form Materials to the IESO?

The deadline to submit the Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period to the IESO and Prescribed Form Materials is March 30th of the year in which the first applicable base period begins, for the full term of the Eligible Purchase Agreement. Prescribed Forms and Prescribed Form Materials must be sent by email to the IESO during the submission window of February 1 to March 30. Additionally, Eligible Purchase Customers and Eligible Generators must submit the Prescribed Form: Attestation for Eligible Purchase Agreement – Post-base Period within 15 days after the base period ends.

Please note: Any delays due to firewalls, technical faults, file size, unreadable or partial scans of compiled documents, forms or attachments will not be taken into account. This time stamp (being the time that the email is received by the IESO) will be the sole determinant of whether electronic documents were received prior to the submission deadline. For clarity, the IESO will not be responsible for late deliveries, deliveries to the incorrect email address or location or other electronic delivery failures. Prescribed Forms and Prescribed Form Materials submitted after the submission deadline will not be accepted. Due to limitations on the size of electronic delivery of emails to the corporateppa@ieso.ca, email of twenty megabytes (20MB), Proponents may submit their Prescribed Form and Prescribed Form Materials through multiple emails. Proponents are advised that the IESO's firewall may reject emails containing attachments when originating from certain public email platforms such as gmail.com; yahoo.com; hotmail.com; msn.com; sympatico.ca; rogers.com and similar public email systems. Proponents are strongly encouraged to utilize email systems operating on private servers for the electronic submission of Prescribed Forms and Prescribed Form Materials.

2.2.8 What documentation can I provide as proof of the Eligible Generation Facility's Commercial Operation date?

A generation facility may have previously achieved Commercial Operation under a number of different connection types, including transmission-connected, distribution-connected, or behind the meter (BTM) configurations. The type of documentation that will need to be provided to demonstrate the generation facility's Commercial Operation date may differ depending on how the generation facility was connected.

Eligible Generators may provide one or more of the following documentation as evidence of the Eligible Generation Facility's Commercial Operation date, including but not limited to:

- A final Registration Approval Notification (RAN) issued by the IESO,
- A connection confirmation letter from the LDC, or
- An as-built Single Line Diagram that has been signed and stamped by a professional engineer.

2.2.9 What should I do if there are changes to the information I originally provided or if my Eligible Purchase Agreement is amended, transferred or terminated?

If any material information previously submitted to the IESO becomes incorrect or incomplete during the term of the Eligible Purchase Agreement, including changes related to any applicable facility, Compensated Electricity, or other relevant details, the Eligible Purchase Customer or the Eligible Generator must notify the IESO in writing at corporateppa@ieso.ca. Updated and complete information must be submitted within ten (10) business days of becoming aware of the change.

Additionally, if an Eligible Purchase Agreement that has been provided to the IESO is amended, restated, assigned, transferred or terminated, the market participant shall notify the IESO in writing no later than five (5) days after the amendment, restatement, assignment, transfer or termination takes effect.

Please see section 10.13(2) of the Ontario Regulation 429/04 for more details on the required information to provide when notifying the IESO.

Please note: if an agreement between an Eligible Purchase Customer and an Eligible Generator is transferred, assigned, terminated or expired at any point during the base period, it is not considered an Eligible Purchase Agreement for any part of the applicable base period.

2.3 Additional Questions

2.3.1 Can my generation facility have a portion of its capacity committed to the capacity auction or any IESO contract, and another portion committed to an Eligible Purchase Agreement under the C-PPA framework?

Yes, generation facilities can have a portion of their electricity generation committed to an Eligible Purchase Agreement under the C-PPA framework, while another portion is committed under a separate IESO contract or program, such as the capacity auction. However, the portion of electricity committed to the Eligible Purchase Agreement under the C-PPA framework cannot be Compensated Electricity, that is, it must not have already been paid for, credited, or committed under another agreement (including capacity auction commitments).

This allocation does not require separate metering. A single meter may be used, provided the allocation of electricity between agreements or commitments can be clearly demonstrated.

2.3.2 Can I have multiple Eligible Purchase Agreements under the C-PPA framework?

Yes, an Eligible Purchase Customer or Eligible Generator could have multiple Eligible Purchase Agreements under the C-PPA framework, provided that the electricity committed under each Eligible Purchase Agreement is not classified as Compensated Electricity.

In situations where an Eligible Generator has entered into multiple C-PPAs, or has other agreements or commitments under a contract or program, and the applicable Eligible Generation Facility is equipped with a single meter, the following will apply:

- The total electricity measured by that meter and supplied to the IESO grid or distribution system will be allocated across all applicable agreements or commitments.
- The allocation will be based on the amounts specified in each agreement or commitment.

2.3.3 Can the generation facility store the electricity that is being purchased under the Eligible Purchase Agreement?

No, the generation facility cannot store electricity that is being purchased under an Eligible Purchase Agreement. Electricity purchased under an Eligible Purchase Agreement must be physically supplied into the IESO-controlled grid or distribution system without first being temporarily stored in an energy storage device or facility.

2.3.4 How are Eligible Generators with C-PPAs settled?

Eligible Generators are settled in the IESO-administered markets for all electricity physically supplied into the IESO-controlled grid or a distribution system. In addition to this, C-PPAs are settled directly between the participating parties on a periodic basis, in accordance with the terms of the agreement. The IESO expects that the Eligible Purchase Customer and Eligible Generator each settle the market price through the IESO administered market and separately settle the difference between the strike price and the market price, consistent with how virtual PPAs typically work in other markets.

2.3.5 How are the Peak Demand Factor and Global Adjustment calculated for Eligible Purchase Customers with multiple delivery points?

Since Global Adjustment (GA) is settled at the delivery point level, any demand reduction from an Eligible Generator will be distributed proportionally across an Eligible Purchase Customer's delivery points, based on measured withdrawal at each delivery point during the peak hour.

Example:

An Eligible Generator injects 1 MW during one of the top 5 peak hours. The load facility has three delivery points with the following withdrawals during that hour:

- Delivery Point 1: 1 MW
- Delivery Point 2: 2 MW
- Delivery Point 3: 3 MW

Total withdrawal = 6 MW.

The 1 MW reduction is distributed proportionally:

- Delivery Point 1: $(1/6) \times 1 \text{ MW} = 0.167 \text{ MW}$
- Delivery Point 2: $(2/6) \times 1 \text{ MW} = 0.333 \text{ MW}$
- Delivery Point 3: $(3/6) \times 1 \text{ MW} = 0.500 \text{ MW}$

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