

Stakeholder Feedback and IESO Response

Long Lead-Time Request for Proposals (LLT RFP) – April 16, 2026

Following the [February 26 2026, Long Lead-Time RFP Engagement Webinar](#), the Independent Electricity System Operator (IESO) invited stakeholders to provide feedback on the following design items: Supply Chain Disclosure, Access Rights - Federal Crown Lands, Regulation Service Readiness Requirements, Timelines, Draft RFP and Contract, and other procurement design considerations. Non-confidential feedback is posted on the [Long Lead-Time RFP Engagement Webpage](#). Feedback identified as confidential by stakeholders is not posted but reflected as part of the common feedback themes. Please reference the feedback forms for specific feedback as the information below is provided in summary.

Note on Feedback Summary and IESO Response

The IESO appreciates the feedback received from stakeholders and communities. The tables set out below respond to the feedback received and are organized by topic. Capitalized terms used in the IESO responses below not otherwise defined herein, have the meaning given to such terms in the draft LLT(e) RFP, LLT(e) Contract, LLT(c) RFP or LLT(c) Contract (each, as applicable) posted to the [Long Lead-Time RFP Webpage](#).

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A) Supply Chain Disclosure

Stakeholders were not supportive of a 50% local content requirement; however, they did not express concerns with the requirement to submit a Supply Chain Disclosure Plan. Views were mixed on the feasibility of meeting the 75% civil works threshold.

Feedback / Common Themes	IESO Response
<p>The IESO should only use the supply chain disclose plan for transparency and not for bid-stage compliance:</p> <ul style="list-style-type: none"> • Early, binding supply chain commitments are impractical given globalized storage supply chains and limited domestic capacity. 	<p>The Supply Chain Disclosure Plan (SCDP) is a Proposal submission requirement intended to support broader policy objectives related to supply chain awareness. The IESO will post a Prescribed Form: Supply Chain Disclosure Plan that Proponents will be required to use for the purposes of meeting this requirement.</p> <p>As part of the Proposal, Proponents are expected to provide the best available information based on their current project plans and market understanding. The IESO will only verify that the plan is complete (i.e., requested information has been provided); it will not be evaluated further. If Proponents are successful in the RFP, their SCDP will be shared with the Ministry of Energy and Mines.</p> <p>Where a Proponent elects to pursue the evaluation incentives related to Canadian Content Requirements and is awarded an LLT(e) Contract or LLT(c) Contract, the Supplier will be required to attest that the Committed Canadian Content Percentage that is achieved at Commercial Operation reflects what was committed to in the Proposal. Per the IESO’s existing rights under the LLT(e) Contract and LLT(c) Contract, the IESO will be able to require additional documentation to verify the Supplier’s attestation, if required.</p>

Feedback / Common Themes	IESO Response
<p>Stakeholders felt a 2% impact is far too low to serve as a mechanism for encouraging Canadian sourced goods and services:</p> <ul style="list-style-type: none"> Some stakeholders suggested Canadian sourcing should offer at least 10% EPP reduction for sourcing more than 50% of total costs from Canadian goods and services. 	<p>The IESO is expecting to be directed by the Ministry of Energy and Mines to include evaluation incentives of between 1% and 3% for Proponents that commit to sourcing between 60% and 100% of Construction Materials and Construction Labour from Canadian sources.</p> <p>As part of the LLT RFP this is proposed as a graduated Evaluated Proposal Price (EPP) reduction framework that provides increasing price adjustments (for the purposes of evaluation) as the Committed Canadian Content Percentage increases, starting at 1% up to a maximum reduction of 3% for proposals committing to a Committed Canadian Content Percentage of 100%. The graduated structure is intended to recognize a range of feasible sourcing outcomes, while encouraging higher levels of Canadian Construction Materials and Canadian Construction Labour Suppliers where possible.</p>

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<p>The Canadian Content Requirements should allow for flexibility to account for supply chain changes between the Contract Date and Commercial Operation.</p>	<p>The Canadian Content Requirements include flexibility through a tiered commitment structure. Proponents may elect to pursue an Evaluated Proposal Price reduction by committing to a minimum percentage of the total cost of Construction Materials and Construction Labour to be sourced by the CCR Supplier from Canadian Construction Materials and Canadian Construction Labour Suppliers, within a defined tier.</p> <p>Compliance will be assessed at the time of Commercial Operation, based on whether the achieved sourcing level remains equal to or above the committed percentage. For greater clarity, specific line items that comprise the Canadian Construction Materials and Canadian Construction Labour Suppliers can change, as long as the minimum committed percentage level is achieved as at the time of Commercial Operation.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should encourage local and Indigenous participation by awarding extra points to projects that source part of their materials or labor from the project’s region or from Indigenous companies or workers.</p>	<p>The LLT RFP includes six (6) Rated Criteria points to encourage Indigenous Community participation; this reflects an evaluated proposal price reduction of up to 10%.</p> <p>The IESO is expecting to be directed by the Ministry of Energy and Mines to include evaluation incentives for Proponents that commit to sourcing a percentage of Construction Materials and Construction Labour from Canadian sources. While the IESO does not expect to be directed to include additional incentives expected for Construction Materials and Construction Labour sourced from Indigenous Communities, these can be included as part of the Committed Canadian Content Percentage, if they meet the applicable definitions.</p>

B) Access Rights- Federal Crown Lands

One stakeholder agreed with the IESOs proposal that a Survey Permit from Parks Canada should be the instrument which confirms site access on federal waterways. No other significant feedback on this subject was received.

C) Regulation Service Readiness Requirements

Stakeholders were supportive of the IESO’s proposed Regulation Service Readiness Requirements. Specific feedback is detailed below

Feedback / Common Themes	IESO Response
<p>The IESO should clarify whether LLT Capacity Projects that are subject to the Regulation Services Readiness Requirements must be capable of providing at minimum 10 MW of capacity for the purposes of Regulation Service:</p> <ul style="list-style-type: none"> The requirement is not otherwise tied to the LLT Capacity Project's Maximum Contract Capacity or Nameplate Capacity. 	<p>LLT Capacity Projects are only subject to the Regulation Services Readiness Requirements where the facility qualifies as a Regulation Ready Required Facility (as defined in the LLT(c) RFP). A facility is considered a Regulation Ready Required Facility only if it has a nameplate capacity greater than or equal to 20 MW and is connected directly to the Transmission System.</p> <p>Where applicable, such facilities must be capable of providing regulation services with a magnitude of no less than ± 10 MW and a ramp rate/minute of no less than 50% of that magnitude.</p>

D) Timelines

Feedback / Common Themes	IESO Response
<p data-bbox="214 296 857 548">Multiple Proponents stated that the proposed LLT RFP bid timelines (7–10 months) are significantly shorter than prior IESO procurements which typically allowed 12–14 months for bid preparation:</p> <ul data-bbox="272 579 857 1010" style="list-style-type: none"><li data-bbox="272 579 857 747">• The compressed timeline is especially problematic given new or added requirements (e.g., MSR constraints, Canadian content requirements).<li data-bbox="272 751 857 1010">• Hydroelectric projects have not been procured in over a decade and lack an existing project pipeline, making the short timeline particularly challenging for a first of its kind round.	<p data-bbox="873 296 1406 590">The IESO has extended the bid submission deadline to November 26, 2026, providing Proponents with additional time to advance project development, complete necessary studies, and prepare competitive proposals.</p> <p data-bbox="873 646 1438 947">Proponents are strongly encouraged to engage with the Ministry of Natural Resources to undertake preliminary and exploratory work, including discussions related to site suitability, to support project readiness within the revised timeline.</p> <p data-bbox="873 1003 1446 1388">The IESO notes that the period of time between posting of final procurement documents and the Proposal Submission Deadline for window 1 of the LT2 RFP was less than 4 months for the energy stream and less than 6 months for the capacity stream, which is 1 to 3 months shorter than the time being provided for the LLT RFP.</p>

Feedback / Common Themes	IESO Response
<p data-bbox="224 174 812 386">Municipal elections and summer/fall timing materially constrain Proponents’ ability to engage municipalities and secure required Municipal Support Resolutions (MSRs):</p> <ul data-bbox="272 415 857 1549" style="list-style-type: none"> <li data-bbox="272 415 857 533">• Municipal elections in fall 2026 disrupt council availability and decision-making. <li data-bbox="272 548 857 625">• Summer months reduce effective engagement windows. <li data-bbox="272 653 857 770">• Early engagement does not resolve the structural reluctance of councils in election years. <li data-bbox="272 798 857 875">• MSRs introduce binary risk late in the process. <li data-bbox="272 903 857 1020">• As a result, securing MSRs before October 1, 2026 is seen as impractical for many projects. <li data-bbox="272 1050 857 1549">• The IESO should replace MSRs with: <ul data-bbox="370 1125 857 1549" style="list-style-type: none"> <li data-bbox="370 1125 857 1203">○ Municipal comments (non-binding), and <li data-bbox="370 1230 857 1308">○ Standardized Community Support Funds. <li data-bbox="370 1335 857 1549">○ Alternatively, shift MSRs to a post bid, condition of award requirement, consistent with prior IESO procurements (e.g., ELT1 and LT1). 	<p data-bbox="865 174 1461 516">The requirement to obtain a Municipal Support Confirmation at the time of Proposal submission is a policy requirement, expected to be included in government direction, consistent with what has been done in the LT2 RFP. The IESO expects to receive the same policy direction for the LLT RFP.</p> <p data-bbox="865 569 1461 957">In order to manage stakeholder concerns related to the timing of the municipal election, the IESO has released final versions of the Prescribed Form: Evidence of Municipal Support that can be used for the purposes of obtaining Municipal Support Confirmations. The forms can be accessed on the Long Lead-Time RFP Webpage.</p>

Feedback / Common Themes	IESO Response
<p data-bbox="224 174 781 338">Multiple Proponents expressed concerns the current timeline may discourage participation in the LLT RFP:</p> <ul data-bbox="272 369 857 1041" style="list-style-type: none"> <li data-bbox="272 369 781 495">• Insufficient time to complete development milestones leads to higher bid risk. <li data-bbox="272 520 834 772">• In some cases, information required to submit a proposal, such as connection availability is further constrained by dependency on other procurement outcomes (e.g. LT2 window 1). <li data-bbox="272 785 857 1041">• Proponents may choose not to pursue participation in LLT RFP and instead focus future development efforts on projects that better align with the requirements of the LT2 RFP window 2. 	<p data-bbox="865 174 1469 520">The IESO notes that the LLT RFP and the LT2 RFP are distinct opportunities with unique timelines, targets, and design features, and each will proceed independently. Proponents should assess participation in each procurement based on the specific requirements and objectives of the respective RFP.</p> <p data-bbox="865 573 1469 783">To support proponents in advancing project development and considering deliverability risks, the IESO is offering pre-deliverability testing prior to proposal submission.</p> <p data-bbox="865 835 1469 1140">Test results will be updated as results from window 1 of the LT2 RFP become available. Please note that the first such deadline for LLT RFP Proponents is April 28, 2026. Pre-Deliverability Tests for this phase will include the results of the LT2(e-1) RFP.</p> <p data-bbox="865 1192 1469 1444">In addition, to address concerns related to schedule feasibility and to support broader participation, the IESO has extended the proposed LLT RFP Proposal Submission Deadline to November 26, 2026.</p>

E) Draft RFP and Contract

Feedback / Common Themes	IESO Response
<p data-bbox="203 289 852 457">Consent for early long-lead CODs should not be at the IESO’s sole discretion; instead, consent should be “not unreasonably withheld”:</p> <ul data-bbox="256 489 852 831" style="list-style-type: none"><li data-bbox="256 489 852 831">• Project financeability is highly sensitive to timing. A project that is financially viable with a six-year lead time may not remain viable with a seven-year lead time. As currently drafted, the IESO language introduces uncertainty that could impede financeability.	<p data-bbox="868 289 1487 548">Article 2.3 of the LLT Contracts that were posted to the Website on April 1, 2026 has been updated such that written consent related to a request for an Early Long Lead COD shall not unreasonably be withheld by the IESO.</p>

F) General Feedback

Feedback / Common Themes	IESO Response
<p>Proponents strongly oppose the IESO’s intention to rely on a confidential Reserve Price derived primarily from LT2 (non-hydro) results for LLT Energy hydro projects:</p> <ul style="list-style-type: none"> • Non-hydro technologies do not reflect hydroelectric cost structures, asset life, risk profile, or system value. • Hydro projects have significantly longer lifespans and unique operational/system benefits that are not captured by LT2 benchmarks. • Reliance on non-hydro pricing introduces material pricing risk and bid uncertainty, discouraging participation. 	<p>The Reserve Price in the LLT RFP is intended to serve as a price ceiling that reflects the IESO’s willingness to pay for LLT Energy Projects and LLT Capacity Projects, rather than a target price or an estimate of the underlying cost of specific technologies or projects. The IESO notes that affordability and ratepayer impacts are a key consideration for procurement activities and the IESO will be including a reserve price to manage these impacts.</p> <p>In establishing the Reserve Price, the IESO will consider a range of relevant inputs to value resource specific attributes and support a competitive procurement outcome. The Reserve Price will remain confidential to avoid anchoring proposal prices and to encourage Proponents to submit offers that reflect their own cost structures, risk assessments, and valuation of the contract opportunity.</p>

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<p>Proponents emphasize that confidential reserve pricing materially undermines investor confidence:</p> <ul style="list-style-type: none"> • Proponents cannot assess the reasonableness of bid economics without some visibility into pricing expectations. • The IESO should disclosure of the Reserve Price (or its methodology) early for industry feedback. • If confidentiality is retained the IESO should: <ul style="list-style-type: none"> ○ Waive bid submission fees. ○ Commit to a second procurement round if targets are not met. ○ Offset pricing risk through other procurement flexibilities. 	<p>The IESO does not intend to disclose the Reserve Price or the specific methodology used to calculate it in advance of the Proposal Submission Deadline. The IESO will document the Reserve Price in coordination with its fairness advisor in respect of the LLT RFP. An indication of potential value attributes was shared during the February 26 Stakeholder Engagement Session. Maintaining confidentiality of the Reserve Price is intended to avoid anchoring proposal prices and to support a competitive procurement outcome.</p> <p>With respect to proposal costs, the Proposal Fee is intended to support the costs associated with proposal evaluation. As such, the IESO will not return Proposal Fees in circumstances where a proposal price exceeds the Reserve Price.</p> <p>At this time, the IESO expects to be directed to run a single window of the LLT RFP. Future windows will be at the discretion of the Ministry of Energy and Mines and are expected to depend on procurement outcomes (e.g., pricing, contracts awarded, remaining targets) and system needs.</p>

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<p>Multiple Proponents recommended running LLT and LT2 in parallel in 2027, with aligned submission dates. Key benefits cited:</p> <ul style="list-style-type: none"> • Enables: <ul style="list-style-type: none"> ○ Shared transmission connections. ○ Blended or hybrid projects (e.g., hydro + wind). ○ Improved ability to meet Canadian content requirements. • Reduces: <ul style="list-style-type: none"> ○ Development risk, ○ Connection costs, ○ Overall costs to ratepayers. • Supports more efficient network expansion and project planning. 	<p>The LLT RFP and LT2 RFP are distinct procurements with unique timelines, targets, and design features, developed to meet different policy and system objectives. As such, each procurement will proceed independently, and on their own timelines.</p> <p>The IESO recognizes the importance of providing Proponents with sufficient time to assess participation and development strategies. In response to this feedback, the IESO has extended the proposed Proposal Submission Deadline of the LLT RFP to November 26, 2026.</p>

Feedback / Common Themes	IESO Response
<p>The IESO should provide earlier access to deliverability information to avoid information asymmetry. Specific requests:</p> <ul style="list-style-type: none"> • Release the transmission upgrade list as early as possible. • Initiate pre-deliverability assessments sooner. • Introduce flexibility by: <ul style="list-style-type: none"> ○ Allowing more than three submissions. ○ Clarifying that submission limits apply to projects, not Proponents. 	<p>Connection guidance for pre-deliverability testing is available in Appendix A of the March 26 Stakeholder Engagement Session materials, to support early project planning and development considerations.</p> <p>The IESO has posted Pre-Deliverability Test Intake Forms to the Website.</p> <p>The IESO will test up to three intake forms, across all Pre-Deliverability submission deadlines, per prospective Proponent, for each of the LLT(e) and LLT(c), with each form corresponding to one connection arrangement and project size. Where more than three intake forms (for each of the LLT(e) or the LLT(c)) are submitted by a prospective Proponent, these will be tested at the discretion of the IESO, based on priority indicated by the prospective Proponent, which the IESO will endeavor to apply equally to all prospective Proponents. Projects will be tested for deliverability individually, without due regard. Instructions related to submissions can be found within the forms, and the associated deadlines are also posted on the Website.</p> <p>In addition, the Deliverability Testing Methodology has been posted on the Website to provide clarity on the assumptions, scope, and limitations of the deliverability tests being conducted.</p> <p>Deliverability consultations can also be scheduled from now until two weeks prior to the Proposal Submission Deadline.</p>