Feedback Form

Long-Lead Time RFP – September 16, 2025

Feedback Provided by:

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Date: September 30, 2025

To promote transparency, feedback submitted will be posted on the Long-Lead Time RFP engagement page unless otherwise requested by the sender.

- ☐ **There is confidential information, do not post**
- X☐ **Comfortable to publish to the IESO web page**

Following the September 16th Long-Lead Time 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 LLT 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 September 30th.**

Foundational Design Elements

Do you have any feedback on the foundational design elements presented during the webinar?

The LLT framing is anchored on lead time (≥5 years) and was designed to allow technologies with longer lead times to have a procurement stream, as they are not eligible to participate in the LT2 procurement due to the target Milestone Date for Commercial Operation. While this is a commendable step towards procuring diverse energy storage resources, the IESO has an opportunity to pivot this procurement to better align with the system needs in terms of operability gaps, duration and diversification of resources.

There is an emerging need for longer duration assets in Ontario due to an increase in electricity demand, penetration of renewable energy generation, and amount of lithium-based energy storage being procured. LDES assets can shift demand and supply as needed, provide inertia, and provide technology diversity. Many of these technologies have mechanical and rotating equipment features, +/- 40 year design lives, and the opportunity for made-in-Canada solutions, maximizing domestic content.

We recommend explicitly scoping the LLT capacity stream to non-lithium and/or non-inverter-based LDES that can demonstrate synchronous attributes, irrespective of whether individual projects need ≥5 years to deliver.

Other system operators have designed procurements to meet these needs:

• SRP (Arizona) launched a non-lithium LDES RFP seeking "non-inverter-based" projects, explicitly to diversify beyond lithium-ion batteries, while securing longer-duration, grid-supportive capabilities.

• National Grid ESO (UK) procured inertia/system strength directly via Stability Pathfinders, contracting synchronous condensers and related assets—because this technical capability (not the technology class or construction time) was the binding need.

Resource Eligibility – Energy and Capacity Streams

Do you have any feedback or general comments to share with the IESO regarding defined eligibility for each stream of the LLT RFP?

Resource Eligibility – Hydro Redevelopments

Do you have any feedback or general comments to share with the IESO ahead of the upcoming repowering webinar regarding the participation of hydro redevelopments?

To help inform eligibility under the LLT RFP, the IESO is looking for project specific details from hydro resources that are looking to redevelop, including:

- existing nameplate and/or contract capacity, location, market participant status, original in-service date, remaining useful life and projected end of life;
- expected time required to redevelop the resource, a list of key milestones/activities, and projected operational lifetime post redevelopment; and
- information regarding whether the redevelopment will result in an increased capacity at the facility beyond what is currently registered with the IESO.

If required, please provide project specific information via a separate document.

Policy Based Rated Criteria: Prime Agricultural Areas (PAAs)

Do you have any information to share with the IESO to inform decisions related to rated criteria for projects locating in PAAs?

Specifically, the IESO is seeking further information, including but not limited to:

- whether proponents are intending to locate their project in a PAA;
- approximate project footprint (in acres), including distinction of surface level and subsurface components;
- land/soil impacts during construction and operation; and
- portion of the land that will remain available for agricultural use post COD.

Team Member Experience Requirements - Capacity

Do you have any feedback regarding the information presented during the webinar?

Round Trip Efficiency (RTE) – Capacity

Do you have feedback to help inform the minimum RTE requirement and development of the associated rated criteria.

We support Energy Storage Canada's comments on RTE in their submission to the IESO for this feedback cycle.

Contract Provisions: Long Term Outages

Do you have any feedback regarding the IESO's proposal related to long-term outages?

Contract Provisions: Environmental Attributes

Do you have any feedback regarding the information shared during the webinar?

We support Energy Storage Canada's comments on environmental attributes in their submission to the IESO for this feedback cycle.

General Comments/Feedback

We support Energy Storage Canada's general comments to the IESO on broadening eligibility to compressed gas storage and their comments on the definition of qualifying projects.