Feedback Form

Long Lead-Time RFP – October 21, 2025

Feedback Provided by:

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Title: Director of Project Management

Organization: Bedrock Energy Corp

Email: [redacted]

Date: November 4, 2025

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

- ☐ **Yes – there is confidential information, do not post**
- ☒ **No – comfortable to publish to the IESO web page**

Following the October 21st Long Lead-Time 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 RFP Stakeholder Engagement Webpage.

Note: The IESO will accept additional materials where it may be required to support your feedback. When sending additional materials, please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca **by November 4, 2025.**

Section 1: LLT Capacity RFP and Contract

Resource Eligibility - Eligible LDES Technologies

Do you have any feedback on the proposed definitions of Eligible LDES Technologies?

Bedrock – we have no further comments on the resource eligibility. Please refer to previous feedback.

Resource Eligibility - Class II Technologies

Do you have any feedback regarding eligible Class II Technologies?

Note - If you are providing suggestions for additional technologies that the IESO should consider, please provide further information, including but not limited to: details related to level of technology readiness, expected project development timelines, permitting pathway, and project lifetime.

Do you have any feedback related to the proposal to procure a maximum of 100 MW from Class II technologies?

Minimum Project Size

Do you have any feedback related to the proposed minimum project size requirement of 50 MW?

Bedrock – we have no additional feedback and are supportive of the minimum proposed project size requirement.

Minimum Duration and Rated Criteria

Do you have any feedback regarding the potential use of rated criteria to incentivize longer durations of up to 12 hours?

Do you have any feedback/information to share related to cost impacts associated with increasing duration from 8 to 12 hours to help inform weighting of the rated criterion, should it apply?

Bedrock – please refer to feedback provide during Bedrock's meeting with the IESO and additional discussions on the durations that is possible with Bedrock's project.

Team Member Experience

Do you have any feedback regarding the IESO's proposed changes to the Team Member Experience requirements?

Bedrock – please refer to the enclosed memo for our feedback on the team member experience draft requirements.

Must-Offer Obligations

Do you have any feedback regarding the IESO's proposals to: (a) expand Qualifying Hours to include additional hours on weekends and holidays and (b) introduce Real-Time Must-Offer Requirements

The IESO is also looking to understand how these changes may impact your proposed project (e.g., cost, operations)?

Contract Capacity

Do you have any feedback regarding the removal of the option to reduce contract capacity?

Do you expect your contract capacity to differ on a monthly or seasonal basis?

Draft Documents

Do you have any feedback to share in relation to the draft RFP and Contract that have been posted to the IESO website?

Bedrock will provided additional feedback on this topic.

Section 2: Additional Design Considerations (applicable to both Energy and Capacity streams)

Mid-Term Extended Outages

Do you have any comments on the IESO's proposal related to Mid Term Extended Outages?

Please provide information to support your feedback or any suggested revisions to the proposed approach including, but not limited to, nature, timeline and frequency of expected Mid-Term Extended Outages.

Regulation Service Readiness

Do you have any feedback regarding the proposed Regulation Service Readiness Requirements?

Please provide information potential cost and/or development timeline impacts that would apply to have the facility be "regulation ready" and any other information the IESO should consider when exploring this mandatory requirement/rated criterion.

Optional Termination

Do you have any feedback regarding the IESO's proposed Optional Termination provision and/or the proposed concept of a NTP Milestone Date?

Do you have any feedback/information to share regarding how other jurisdictions manage the uncertainty related to developing long lead time resources?

Environmental Attributes

Do you have any feedback regarding the IESO's proposal related to sharing the benefits from Environmental Attributes during the second half of the term?

Do you have any feedback on alternate approaches to managing the uncertainty associated with the value of Environmental Attributes?

Section 3: General Comments/Feedback

Do you have any additional feedback to share with the IESO?

Bedrock has the following comment regarding the proposed procurement size:

Bedrock believes that the 600-800 MW that the IESO has allocated for the LLTR RFP may be too small given the nature of LDES projects. Based on proponent participation in the IESO LLTR RFP process to date, and our knowledge of the potential projects that may be targeting a submission into the LLTR procurement (all of which is publicly available), this capacity allocation would likely only be sufficient to accommodate one project, with other submissions being constrained out, and thereby resulting in the IESO not meeting its overall projected system needs that can be serviced by LDES projects

Please see the attached memo for Bedrock's feedback on the draft team member qualifications proposed by the IESO.

Thank you

Response of: **Bedrock Energy Corp.**

To: **IESO**

Re: Webinar LLT LDES RFP Draft Qualification Requirements (DQR)

November 4, 2025

Preamble

Thank you to the IESO for the opportunity for Bedrock to submit its perspectives and recommendations to the IESO staff on the recently proposed IESO LLTR LDES RFP *Draft Qualification Requirements*, which were released in the IESO LLT Webinar on Tuesday October 21st.

Bedrock is very concerned that the newly proposed experienced criteria are inappropriate for technologies (compressed air energy storage and pumped hydro) that either have not been used in abundant numbers of energy storage projects, or if built have not been built recently, anywhere in the world. Moreover, we believe that these criteria, if implemented, would result in the exclusion of almost all potential participants in the long-duration energy storage procurement process, including Bedrock. We believe that this was not intended by the IESO, and therefore would urge the IESO to pursue a different path.

Recommendation

Bedrock recommends:

1. The IESO revert to the straightforward qualification criteria it has used to date for E-LT1, LT1, and LT2 and not criteria which are specific to individual technologies.
2. In the alternative, if the IESO believes it is necessary to require experience with specific proposed technologies, then the IESO should separate experience requirements related to proposed technologies from the general experience required in planning and developing energy projects. Moreover, in the case of compressed air, the global paucity of compressed air *energy storage* projects should be recognized, meaning that experience with projects involving compression and storage for non-electricity purposes

should be allowed. Finally, the geographic limitations on eligible experience should be expanded to include all of Europe, rather than selected countries only.

Discussion

In the LT2(c) RFP, experience requirements address "Planning, Developing, Financing, Constructing and Operating of at least one (1) Qualifying Project". However, the definition of "Qualifying Project" is extremely broad, and not specific to any technology: "Qualifying Project means an Electricity generation or storage facility: (A) with a nameplate capacity of at least 1 MW (measured in alternating current in the case of solar powered generation); and (B) that has achieved commercial operation in any jurisdiction in Canada or the United States of America no more than fifteen (15) years prior to the Proposal Submission Deadline.

This criteria ensures that project teams include experienced people, but *does not specify technology or even type of project*. Whether a participating project is gas-fired, biomass-fired or lithium battery-based, the criteria do not require "same technology" experience, nor do they even require *capacity contract* experience (since solar project experience is explicitly referred to in the definition of Qualifying Project, and these projects are not general "capacity" projects). Instead, the criteria focuses on ensuring that some team members have experience with *energy projects more generally*.

The recently proposed rules for the long-duration energy storage RFP are completely different: according to the October 21 engagement presentation, experience is separated between "same technology" experience for "planning and developing", and more general energy project experience for "financing, constructing and operating". Moreover, "same technology" experience must have been earned in projects which have reached commercial operation within the last ten years, in targeted countries.

For compressed air energy storage, we believe that only two projects in the world would qualify as "same technology" projects under the proposed criteria, and one of these was explicitly named as a "pilot", which suggests it may not be

appropriate grounds of experience for this RFP. For pumped storage, we believe that no project would qualify. To be blunt, we cannot understand the motivation for proposing criteria which effectively make it impossible for almost any proponent to participate in the RFP.

Again, we question the need for "technology experience" as a criteria in general, given that project proponents are making the decision to utilize a technology and have every incentive to manage their risk by including on their team people who have experience with the technology. Project proponents are investing too much to embark on a project without intimately understanding its features and nuances (moreover, they would never succeed in financing a project without thorough understanding of their chosen technology, and the ability to withstand the due diligence required by financial partners).

However, if same technology experience is to be a requirement of the IESO, then why is the technology experience being tied to the concept of "qualifying project"? Particularly when so few qualifying projects exist?

In the case of compressed air energy storage (CAES) projects, Ontario hosts world-class geologists, downhole specialist engineers and first-class drillers, compression, turbo generation, and ancillary personnel for welding, heat recovery, and all manner of integrated operations. Such people, along with operators and financial experts have the expertise to meet reasonable, technology-focused qualifying criteria. As technology advances, so does the knowledge bank of those experts. This is precisely how the TSSA and CSA specialists advance our evolving high technical Canadian standards. They can be counted on, and the RFP criteria should be expanded to recognize this.

Globally, depths of experience can be called upon to support the use of compression technology, though not necessarily for energy storage projects. Some CAES projects have recently been developed in China, but this country was excluded from the IESO's list of eligible jurisdictions. Other projects have been developed in the USA (but are too old to qualify!) and Germany (both ineligible as a country, and too old for the criteria). Beyond CAES, natural gas storage projects – which share much with CAES in the way of equipment and know-how – have been developed both in Ontario and globally, and provide an enormous pool of experience upon which project developers can and will draw.

Summary

Bedrock respectfully submits that the IESO should withdraw the proposed “same technology” requirement for the LDES RFP, and instead continue with the technology-agnostic approach of the e-LT1, LT1 and LT2(c) RFPs. This will ensure that team members will have reasonable, energy project related experience, while not making unreasonable demands with respect to experience on projects that are limited in number, time and geographic scope.

If instead “same technology” experience continues to be a requirement, then such experience should be completely divorced from the concept of “qualifying project”, and instead “same technology” experience should be described substantively, in terms of professional qualifications required (such as geology, drilling, compression, etc.).