

Feedback Form

Long Lead-Time RFP – October 21, 2025

Feedback Provided by:

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Date: 4 November 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?

ORA: See my comments below:

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?

ORA: See comments below:

Minimum Project Size

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

ORA:

50 MW does not capture the complex and highly damaging effects of hydropower with reservoirs and peaking operations.

All hydroelectric facilities proposing peaking operations (holding water back in a headpond for peak demand) must undergo the Long Lead-Time process.

For example, in the first green energy rush in 2010/2011, only one of Xeneca Power Development Inc.'s 19 "modified run-of-river" hydroelectric proposals made it through to an MOE Conditional Approval on a Notice of Completion—5 years after its Notice of Commencement.

The conditional approval included six provisions that were to be completed within 4 months. The proponent failed to meet the requirements of that conditional approval, and the project was never built because its feed-in-tariff expired. So none were constructed.

The project proposal would have been for a 3.4 MW installed capacity generating station in an unorganized township with a 15.7 km zone of influence. This entire area had severe heavy-metal contamination in the sediment because of a 100-year mining legacy (see the figure from the Notice of Completion to the right).

Most of Xeneca's proposals were of a similar capacity on small rivers, and some were sent back for additional studies many times but failed to achieve approval. This speaks to the proponent's lack of seriousness and the complexities of the environmental impacts these projects posed.

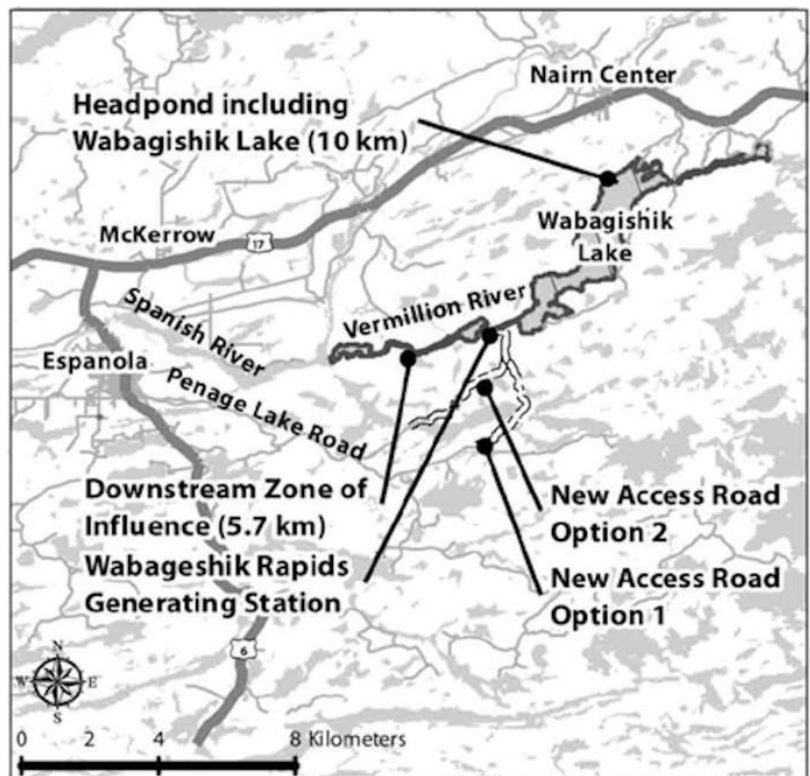
Negative environmental effects from impoundments on smaller rivers are proportionally similar to those on larger rivers, but are often worse in more sensitive systems, where it flows through agricultural land, or where wastewater treatment facilities are releasing effluent into the river. It is also imperative that dams on these smaller rivers are properly planned, consulted on, and constructed to avoid negative effects and dam failure in the event of extreme rainfall or prolonged drought, facing the threat that climate change poses.

The Class EA for Waterpower is totally inadequate to address environmental effects for peaking proposals because it allows the proponent to self-assess whether a project is low- or high-risk in new projects under 200 MW. A low-risk project has removed the requirement for public consultation. Consequently, these projects are high-risk because there is no such thing as a low-risk hydroelectric project when a reservoir/headpond is involved.

Even smaller-capacity projects can have significant negative effects on a smaller river system, including degraded water quality, reduced water quantity, erosion, damage to wetlands, aquatic habitat, methane emissions, and cumulative effects.

Considerations for hydroelectric proposals with reservoirs are numerous, complex and significant. These projects must be carefully planned, properly constructed, and operated. The Class EA for Waterpower is totally insufficient to address these key complexities.

The IESO must ensure that all hydroelectric projects using reservoirs are required to go through the Long Lead-Time process.



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?

ORA:

No, 8 to 12 hours seems reasonable and would limit the number of smaller low-head facilities that would needlessly compromise and fragment many smaller streams and rivers.

Team Member Experience

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

ORA:

It is crucial that proponents be rigorously scrutinized to ensure they have the financial means and a successful record of at least 2 qualifying projects, because hydropower is more complex and more impactful on a riverine ecosystem when not properly planned and mitigated.

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)?

ORA: No

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?

ORA: No

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?

ORA: No.

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.

ORA:

I guess the annual, shorter-term outages will be in August/September, when water levels are lowest and there is insufficient water to turn the turbines.

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.

ORA:

See my comments on solar and wind below in the General section.

Hydropower generation takes 8 to 10 years for the planning, construction and readiness for operation.

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?

ORA:

If either party terminates a hydropower project after construction has begun, the terminating party must be required to remove any installed infrastructure and restore the river to its natural condition.

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

ORA: No

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?

ORA:

There are no environmental attributes associated with hydropower and its reservoirs—see ORA comments below. Instead, hydropower proponents should be required to monitor, measure and report their GHG emissions and purchase carbon credits.

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

ORA: See comments below:

Section 3: General Comments/Feedback

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

ORA:

This is Madness!

In October 2024, the provincial government officially set out the goal of becoming an “Energy Superpower” in its energy strategy. In commenting on the North of Sudbury Bulk Plan, it became obvious in the plot on slide 6 of that presentation that the 15% increase in electricity demand forecast between 2024 and 2025, was a result of that declaration, rather than an actual increase in projected demand. It was a huge increase in forecasted energy needs in just one year.

This comes as many reports indicate that Canada is in a significant economic slowdown, with a risk of recession. Consequently, there are uncertainties about the immediate and long-term

future. In addition, billion-dollar deals with Stellantis and Nexstar are causing even more uncertainty.

Do we really want to jump the gun with additional new hydroelectric projects that would commit the province to funding the planning of these boondoggle projects in such an uncertain climate? Especially when the province is proposing legislation to place partnering Indigenous' up-front planning costs on the shoulders of ratepayers?

Solar and wind are the lowest-cost, quickest-to-deploy, and most scalable clean-energy technologies. So, why are they being sidelined over the next 15 years, while investment continues to flow into hydropower with its long lead times, high deployment costs, significant methane emissions, declining water availability and ecologically damaging effects?

Henvey Inlet First Nation's wind installation is a stellar example to follow for smart, lucrative and effective projects, especially in remote areas with energy storage systems!

ORA urges the IESO to reassess its assumption that procuring new electricity generation in the north should include hydropower. This is inconsistent with the province's own climate objectives and its Ontario Provincial Climate Change Impact Assessment (2023), which warns that *"changes in Ontario's climate are expected to continue at unprecedented rates... posing indirect threats to water availability and water quality."*

Building new hydropower facilities in the north doesn't make sense when you can't transmit the electricity south, where it is really needed.

ORA strongly urges the IESO to first ensure the electricity supply is adequate. If needed, build a reliable and adequate electricity supply over the long term by following through with your plan to build a robust transmission system, increase solar, wind, energy storage systems, conservation and other appropriate non-emitting and emerging technologies for electricity procurement in Ontario.

Hydropower Reservoirs Fuel Climate Change:

Hydropower impoundments emit significant amounts of methane throughout their entire lifecycle, driven by the decomposition of organic matter under anaerobic conditions. It is important to note that the life expectancy of a dam is 100 years or more, meaning that any new or reconstructed/refurbished dam and reservoir will emit copious amounts of methane for at least the next 100 years.

Recent independent peer-reviewed studies (e.g., [DeSontro et al., 2018](#); [Beaulieu et al., 2020](#); [Scherer & Pfister, 2016](#)) demonstrate that reservoir methane emissions can rival or exceed those coming from thermal/natural gas facilities over a 20-year horizon. Moreover, dam-related freshwater warming, eutrophication, sediment retention, and methyl-mercury accumulation in fish threaten cold water ecosystems and Indigenous communities that rely on fish as a main staple in their diet. You can turn off a gas-fired facility, but you cannot turn off the methane coming from a reservoir until the dam is removed.

Aggressively Misleading and Greenwashed Hydropower:

Contrary to the greenwashed rhetoric of the hydropower industry and the province, it is not clean, non-emitting, or renewable, as it carries a multitude of negative environmental impacts that are generally not addressed:

1. Hydropower has high construction costs and takes 8 to 10 years for the planning, construction and readiness for operation.
2. Ontario has 224 hydroelectric facilities, but only 2 facilities have provided operating fish passage.
3. Dams disrupt connectivity to prime spawning habitat, leading to declines in migratory fish populations.
4. Dams are considered a major factor in the extirpation of Ontario's Atlantic Salmon stock, a significant cause of anthropogenic mortality and decline in Ontario's American Eel, and a key threat to Ontario's declining Lake Sturgeon populations.
5. New hydropower using reservoirs will emit significant amounts of methane that can rival those of a gas-fired facility and will continue to do so for approximately 100 years, until the dam is removed.
6. There are no up-front requirements to secure the funds for decommissioning when the dam is no longer viable or useful. Funds for decommissioning dams are few and far between.
7. Hydropower's intermittent and unreliable nature is posing increasing challenges across Ontario and Canada due to recurring drought, resulting in reduced flows and the need to burn fossil fuels for energy.
8. Hydropower and its reservoirs can severely impact the riverine environment for many kilometres upstream and downstream of a dam, especially when there are multiple cascading facilities and reservoirs on a river system, which is often the case.

New Hydropower Doesn't Make Sense:

In addition, it is good to see that the IESO recognizes that hydropower is an energy-limited and unreliable resource—not just at night when reservoirs are refilling, but also during summer droughts when air conditioners are ramping up and water levels are low. ORA can list many more negatives with hydropower than there are positives.

So, instead of energy-limited and costly new or expanded hydropower, the IESO should model the least expensive solution, including:

- Indigenous-led solar microgrids, small-scale community wind projects, and hybrid renewable portfolios paired with modern energy storage systems (battery or compressed air).

- Transmission infrastructure reinforcement and redundancy to unlock existing capacity without new or enlarged impoundments.
- Industrial demand management, electrification efficiency, and conservation-first approaches.

Indigenous Consultation:

The IESO and the province must ensure that Free, Prior, and Informed Consent from Indigenous communities is not undermined by economic pressure, a lack of disclosure of the negative effects or a scarcity of alternatives. Ontario Power Generation and the Ontario Waterpower Association are marketing equity partnerships in hydropower and related storage projects as economic lifelines for remote communities.

While ORA supports Indigenous prosperity, such participation should not come at the expense of environmental values or long-term liabilities. The IESO/Province should:

1. Provide independent, community-controlled capacity funding for legal, technical, and environmental reviews not tied to any specific project.
2. Present non-hydro alternatives side-by-side—solar, wind, community storage, and efficiency so communities can make informed decisions. Solar and wind, along with energy storage systems, are scalable, cheaper to construct, and can be up and running much faster than hydropower. In addition, a new report from the climate think-tank

electricity than coal plants for the first time. [Solar output surged nearly 30% year-on-year and met 83% of global electricity demand growth.](#)

3. Require lifecycle GHG and water-quality disclosure details for each generation option considered.
4. Limit new pumped storage development to closed-loop (off-river) sites on already disturbed lands.
5. Require upfront decommissioning and environmental damage funds to prevent stranded or unsafe infrastructure.

This approach ensures Indigenous communities are not pressured into compromising their values and can pursue sustainable, self-directed energy sovereignty consistent with climate and cultural resilience.

Linda Heron, Chair
[Ontario Rivers Alliance](#)