

Feedback Form

Long Lead-Time RFP – October 21, 2025

Feedback Provided by:

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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?

The OWA suggests that, with respect to Pumped Storage (PSH), the IESO clarify that besides purpose-built greenfield PSH (a storage system that uses the pumping and release of water between two reservoirs at different elevations to store and retrieve potential energy), retrofitting and modernizing existing conventional hydropower assets for pump-back capability is also considered “pumped storage”. The most obvious conversion approaches would be to:

- Add a pump-turbine to an existing plant;
- Install a separate pump station to return water from the tailrace to the headpond reservoir;
- Replace existing turbine-generator units with reversible pump-turbine equipment.

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?

No comment.

Minimum Project Size

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

The OWA does not support the proposed minimum project size requirement of 50MW for pumped storage hydro. The inventory of Ontario’s >150 PSH technical potential sites includes a number of projects less than 50MW and it can be expected that additional PSH projects will come forward in response to the LLT procurement. The LLT minimum capacity for PSH should be 1MW, consistent with the Energy Stream.

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?

The OWA would support some form of weighted criteria.

Team Member Experience

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

We recommend that the criteria for "Planning and Developing at least one Same Technology Qualifying Project" for PSH projects be expanded to include hydroelectric under the "same technology" as PSH, given that Pumped Storage **Hydropower** is simply another form of hydroelectricity.

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)?

No comment, provided that such availability for additional hours is compensated.

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?

For some PSH projects (e.g. retrofitting and modernizing existing conventional hydropower) contract capacity may vary on a monthly or seasonal basis as a function of water availability.

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?

No additional comment provided that the input provided herein is considered/incorporated.

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.

Per our previous submission, the OWA supports the maximum duration of twelve months but recommends that it be available over up to two (2) outages to ensure any significant work required is planned and executed properly.

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.

The OWA would support a rated criteria approach for the Capacity Stream to incentivize facilities to install the required equipment to be ready to provide regulation services in the future.

With respect to the Energy Stream, we note that the majority of the responses to the IESO's RFI were for hydroelectric projects less than 10MW in capacity. As such, the OWA does not support the inclusion of a mandatory requirement or rated criteria for hydro projects for these run-of-river projects which have limited ability to provide Automatic Generation Control given the lack of water storage on managed river systems. Smaller stand-alone, run-of-river facilities cannot reliably respond to sudden changes in grid demand, especially during periods of low flow and/or due to their regulatory responsibilities on managed river systems.

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?

Proponents require much more detailed information on the IESO's proposal and rationale to include two-way optional termination provision in the LLT contracts and in particular the basis upon which the IESO could exercise such provision absent some form of non-compliance with contractual provisions. As presently described, it would appear that the provision would enable the IESO to terminate the contract without cause and yet be required to "provide a fixed payment to the Supplier to cover **a portion** of development costs". This introduces a new and potentially unmanageable risk at this late stage of procurement and contract design.

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?

The OWA recommends that the IESO's approach to Environmental Attributes under the LLT be consistent with those under LT2 (i.e. supplier owns the Attributes for the duration of the contract).

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?

Yes, the OWA does not support the IESO's proposal to introduce Reserve Prices under both the energy and capacity streams. Rather, the OWA recommends that, as has been the case with other procurements, the IESO establish a % threshold of capacity/energy targets within the capacity/energy streams (e.g. 80%) as the basis for determining which projects are initially successful, with a reasonable bounding of the upper limit of price based on the average price bid. A reserve price serves no purpose in "managing uncertainty related to the cost of developing long lead time resources" as it will be proponents, through the competitive procurement process who will be responsible for the majority of risk management against bid price (as indexed between contract execution and commercial operation). A more reasonable approach, and one we have previously recommended, would be to provide incentives to those projects which achieve commercial operation early.

Finally, we look forward to a more fulsome engagement on the LLT energy stream and, in particular, the inclusion of hydroelectric redevelopments/refurbishments and incremental energy from upgrades and expansions.

Below please find a 2023 map of Ontario's PSH Technical Potential sites¹



Figure 23 Distribution of Theoretical Potential PSH Sites in Ontario

¹ <https://waterpowercanada.ca/resources/pumpedstoragehydropowerincanada/>