

Feedback Form

Long-Term 2 RFP – April 24, 2025

Feedback Provided by:

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Date: May 9, 2025

To promote transparency, feedback submitted will be posted on the LT RFP 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 LT2 RFP April 24, 2024, 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 LT2 [engagement web page](#).

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 May 9, 2025.

Tariff Risk Mitigation

Do you have any comments related to the tariff risk mitigation concepts presented during the webinar?

The OWA appreciates that the IESO is assessing measures to address the potential impacts of tariffs on the procurement of energy and capacity resources and encourages that such measures do not distort the outcome of the procurement such that Canadian sourced products are competitively disadvantaged. The IESO will also need to consider the potential implications of outright restrictions on products and services from other jurisdictions.

LT2 RFP and Contract Updates

Do you have any comments related to the other RFP and Contract updates presented during the webinar?

We have yet to see a clear procurement path that addresses the Minister's May 8, 2024 Directive which stipulates that the IESO will existing hydroelectric facilities who want to expand or upgrade to participate in the LT2 RFP. Upgrades and expansions of existing hydroelectric facilities can take a number of forms, from efficiency and/or capacity increases to the addition of turbine/generator units. In many cases, such expansions or upgrades would not result in a separately metered facility, as appears to be the approach embedded in the LT2 Program Rules and Contract. The OWA would appreciate the opportunity to discuss this matter directly with the IESO in to ensure that final Program design does not compromise the intent of the Minister's direction.

LT2 RFP Requirements for Crown Land Projects

Do you have any comments regarding the new Proposal Submission requirements for Crown Land Projects?

The OWA remains concerned that MNR has still not provided details on the Crown Land Site Report requirements and that MNR's processes has already caused delay to the LT2 procurement – in our view a harbinger of issues to come. The last significant procurement of new hydroelectric resources in Ontario resulted in only twenty percent (20%) of projects offered contracts being eventually built and input costs increased by more than fifty percent under a fixed-rate contract – largely due to delays in MNR review and approvals processes. With the rated criteria providing an advantage to projects located in the north, the vast majority of which is provincial Crown land, the lack of urgency by MNR throughout is particularly troubling. As was the case with previous procurements involving Crown land, the IESO should anticipate and prepare for project permitting delays that are beyond the control of the proponent.

LT2 RFP Deliverability Update

Do you have any comments regarding the deliverability guidance updates presented during the webinar?

No

General Comments/Feedback