



Corporate Power Purchase Agreements Framework Backgrounder and FAQs

Version 3
January 2026

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Disclaimer

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The reader should be aware that where a provision of Ontario Regulation 429/04 is applicable, the obligation that needs to be met is as stated in Ontario Regulation 429/04. To the extent of any discrepancy or inconsistency between the provisions of Ontario Regulation 429/04 and this document, the provision of Ontario Regulation 429/04 shall govern. In the event there is any conflict or inconsistency between this document and the IESO market rules, any IESO contract, any legislation or regulation, or any request for proposals or other procurement document, the terms in the market rules, or the subject contract, legislation, regulation, or procurement document, as applicable, govern.

All capitalized terms used herein, unless otherwise stated, have the meanings ascribed to the non-capitalized versions of the same terms in Ontario Regulation 429/04 or as defined in the Prescribed Forms.

Document Change History

Version	Reason For Change	Date
1	C-PPA Framework Backgrounder & FAQs	2025/10/08
2	Updated Key Terms New FAQ: 2.3.5	2025/10/29
3	New FAQs: 2.1.2, 2.1.3, 2.2.10, 2.2.11, 2.2.12, 2.2.13,2.3.7, 2.3.8, 2.3.9, 2.3.10	2026/01/14

1. Overview and Backgrounder

In June 2025, [Ontario Regulation 429/04](#) was amended to introduce a new regulatory framework for Corporate Power Purchase Agreements (C-PPAs), giving large electricity users a new way to support clean energy projects in the province. The framework aims to improve the economic viability of C-PPAs by enabling Class A market participants under the Industrial Conservation Initiative (ICI) program to potentially lower their peak demand factor (PDF) during the top five peak hours of a base period for Global Adjustment (GA) settlement purposes through agreements with eligible renewable generation facilities. This approach creates new revenue opportunities for generators and gives consumers more ways to be part of Ontario's clean energy transition through contracts with renewable projects in other locations.

For more information on the ICI program please visit the [IESO Settlement webpage](#).

The IESO ensures participants meet and maintain eligibility for C-PPAs, requiring market participants to provide confirmation of regulatory compliance.

1.1 Key Terms

Industrial Conservation Initiative (ICI): The ICI program was designed to incentivize eligible industrial and commercial customers to reduce their demand during peak periods in order to help the province defer the need for investments in new electricity infrastructure. Customers who participate in the ICI, referred to as Class A, pay GA based on their percentage contribution to the top five peak hours over a base period.

Peak Demand Factor (PDF): a Class A customer's percentage contribution to the top five peak hours over a 12-month base period (May 1 to April 30)

Base Period: 12-month period which lasts between May 1 to April 30 of the following calendar year. A customer's consumption and demand data during this period are used to determine if a customer is eligible to participate in the ICI program.

Adjustment Period: 12-month period which lasts between July 1 of the calendar year in which the base period ends June 30 of the following calendar year. If a customer chooses to participate in the ICI program for a given adjustment period, their monthly Class A global adjustment charges, during the adjustment period, will be calculated based on their PDF.

Class A Market Participant: is an Ontario market participant that is not a licensed distributor or regulated consumer and participates in the ICI, as defined under Section 7 of [Ontario Regulation 429/04](#).

Global Adjustment (GA): the electricity bill component that covers the cost of building new electricity infrastructure, maintaining and refurbishing existing generation resources and covers the

cost of delivering conservation programs in order to ensure adequate electricity supply over the long term in the province of Ontario.

Load Facility: Means a facility that withdraws electricity either from the distribution system of a licensed distributor or from the IESO-controlled grid.

Market Participant: means any company who is authorized by the market rules to participate in the IESO-administered markets or to cause or permit electricity to be conveyed into, through or out of the IESO-controlled grid.

Binding Date: means, in relation to an Eligible Purchase Agreement, the day on which the agreement first becomes binding on the Eligible Purchase Customer and the Eligible Generator who are the parties to the agreement.

2. Frequently Asked Questions

2.1 Eligibility

For detailed information on the eligibility requirements to participate in the C-PPA framework, please refer to the [Corporate Power Purchase Agreements Framework Guideline](#).

2.1.1 What is a market participant, and is a distribution-connected load or generator eligible to participate in the C-PPA framework?

A market participant is any entity authorized to participate in the IESO-administered wholesale electricity market.

Distribution-connected loads or generators may participate in the C-PPA framework, provided they are registered as market participants and are settled in the IESO-administered market.

For more information on the types of market participants, please refer to IESO's [Introduction to Ontario's Physical Markets](#) training guide.

To learn more about becoming a market participant, visit the IESO's [Connecting to Ontario's Power System](#) webpage.

2.1.2 Ontario Regulation 429/04 mentions "insufficient wind or sunlight" as an uncontrollable limitation. Does this provision also apply to other resources, such as low water levels for hydro or limited biofuel?

While "insufficient wind or sunlight" applies to electricity generated from "wind or solar energy" per section 10.13(1)(d)(i)(C) of Ontario Regulation 429/04, the Regulation also includes provisions for "other circumstances beyond the reasonable control of the eligible generator", which provision is not limited to specific resource types: section 10.13(1)(d)(i)(E). As noted, an eligible generator may generate electricity from wind, water, biomass, biogas, biofuel, solar energy or geothermal energy: section 10.12(3)(2). While each circumstance is unique and would need to be considered at the relevant time, there does not appear to be any basis in the Regulation to say that hydro or biofuel-based eligible generators may not avail themselves of section 10.13(1)(d)(i) where applicable.

2.1.3 Ontario Regulation 429/04 requires that "some volume" of eligible electricity be supplied during each hour of the base period. How should "some volume" be interpreted?

The IESO understands that the requirement to deliver "some volume" of Eligible Electricity in each hour of the base period refers to any non-zero amount of energy that is capable of being recorded and settled in the IESO-administered markets.

This approach supports ongoing participation and offers flexibility, with exceptions allowed when delivery is prevented by factors beyond the generator's control.

Generators should confirm with the Ministry of Energy and Mines for definitive guidance.

2.2 Required Forms and Attestations

2.2.1 What is an attestation?

An attestation is a formal declaration confirming that the requirements of Ontario Regulation 429/04 have been met. The required C-PPA attestations must be submitted in the IESO-approved format and within the approved timeframe.

2.2.2 Who is required to complete the C-PPA attestations?

Eligible Purchase Customers and Eligible Generators are required to submit the C-PPA attestations to the IESO using the Prescribed Forms specified by the IESO within the specified time frame.

2.2.3 What do I need to submit?

Prior to the start of the first applicable base period, both the Eligible Purchase Customer and the Eligible Generator are required to submit the applicable C-PPA attestations to the IESO in the Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period, along with all associated forms, exhibits, workbooks and other materials by March 30th. This Prescribed Form is intended as a joint submission with distinct requirements for each party to attest to and includes the Generator Workbook and Purchase Customer Workbook by reference. This submission is required only once and does not need to be resubmitted in future base periods for the full term of the Eligible Purchase Agreement, assuming there are no changes to the arrangement requiring notification to IESO as per Ontario Regulation 429/04.

Within 15 days after the end of each applicable base period, the Eligible Purchase Customer and Eligible Generator are required to submit the applicable C-PPA attestations to the IESO in the Prescribed Form: Attestation for Eligible Purchase Agreement – Post-base Period.

2.2.4 Where do I find the required Prescribed Forms and Prescribed Form Materials?

The required Prescribed Forms and Prescribed Form Materials can be found on the [C-PPA website](#).

2.2.5 How do I complete the Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period and associated workbooks if I have more than one facility?

Each Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period, along with its associated workbooks, must relate to a single Eligible Purchase Agreement, one Eligible Purchase Customer, and one Eligible Generator. This Prescribed Form is a joint submission by both the Eligible Purchase Customer and the Eligible Generator, with separate sections for each party.

If multiple facilities are covered under the same Eligible Purchase Agreement:

- **Eligible Purchase Customer:** Submit a single Eligible Purchase Customer Workbook, with each worksheet tab dedicated to a specific load facility.*
- **Eligible Generator:** Submit a single Eligible Generator Workbook, with each worksheet tab dedicated to a specific Eligible Generation Facility.*
- **Prescribed Form:** Ensure the relevant sections of the attestation form reflect the applicable information for all included facilities.

*If additional worksheets are required to cover additional facilities, please submit a new workbook.

2.2.6 Where do I submit the Prescribed Forms and Prescribed Form Materials?

All Prescribed Forms and Prescribed Form Materials are required to be submitted electronically via email to the IESO at corporateppa@ieso.ca.

2.2.7 What is the deadline to submit the Prescribed Forms and Prescribed Form Materials to the IESO?

The deadline to submit the Prescribed Form: Attestation for Eligible Purchase Agreement – Pre-base Period to the IESO and Prescribed Form Materials is March 30th of the year in which the first applicable base period begins, for the full term of the Eligible Purchase Agreement. Prescribed Forms and Prescribed Form Materials must be sent by email to the IESO during the submission window of February 1 to March 30. Additionally, Eligible Purchase Customers and Eligible Generators must submit the Prescribed Form: Attestation for Eligible Purchase Agreement – Post-base Period within 15 days after the base period ends.

Please note: Any delays due to firewalls, technical faults, file size, unreadable or partial scans of compiled documents, forms or attachments will not be taken into account. This time stamp (being the time that the email is received by the IESO) will be the sole determinant of whether electronic documents were received prior to the submission deadline. For clarity, the IESO will not be responsible for late deliveries, deliveries to the incorrect email address or location or other electronic delivery failures. Prescribed Forms and Prescribed Form Materials submitted after the submission deadline will not be accepted. Due to limitations on the size of electronic delivery of emails to the corporateppa@ieso.ca, email of twenty megabytes (20MB), Proponents may submit their Prescribed Form and Prescribed Form Materials through multiple emails. Proponents are advised that the IESO's firewall may reject emails containing attachments when originating from certain public email

platforms such as gmail.com; yahoo.com; hotmail.com; msn.com; sympatico.ca; rogers.com and similar public email systems. Proponents are strongly encouraged to utilize email systems operating on private servers for the electronic submission of Prescribed Forms and Prescribed Form Materials.

2.2.8 What documentation can I provide as proof of the Eligible Generation Facility's Commercial Operation date?

A generation facility may have previously achieved Commercial Operation under a number of different connection types, including transmission-connected, distribution-connected, or behind the meter (BTM) configurations. The type of documentation that will need to be provided to demonstrate the generation facility's Commercial Operation date may differ depending on how the generation facility was connected.

Eligible Generators may provide one or more of the following documentation as evidence of the Eligible Generation Facility's Commercial Operation date, including but not limited to:

- A final Registration Approval Notification (RAN) issued by the IESO,
- A connection confirmation letter from the LDC, or
- An as-built Single Line Diagram that has been signed and stamped by a professional engineer.

2.2.9 What should I do if there are changes to the information I originally provided or if my Eligible Purchase Agreement is amended, transferred or terminated?

If any material information previously submitted to the IESO becomes incorrect or incomplete during the term of the Eligible Purchase Agreement, including changes related to any applicable facility, Compensated Electricity, or other relevant details, the Eligible Purchase Customer or the Eligible Generator must notify the IESO in writing at corporateppa@ieso.ca. Updated and complete information must be submitted within ten (10) business days of becoming aware of the change.

Additionally, if an Eligible Purchase Agreement that has been provided to the IESO is amended, restated, assigned, transferred or terminated, the market participant shall notify the IESO in writing no later than five (5) days after the amendment, restatement, assignment, transfer or termination takes effect.

Please see section 10.13(2) of the Ontario Regulation 429/04 for more details on the required information to provide when notifying the IESO.

Please note: if an agreement between an Eligible Purchase Customer and an Eligible Generator is transferred, assigned, terminated or expired at any point during the base period, it is not considered an Eligible Purchase Agreement for any part of the applicable base period.

2.2.10 How should generators complete the “Compensated Electricity” section of the C-PPA Eligible Generator Workbook if their existing contracts are energy-based?

Energy-based contracts typically specify a capacity limit, usually defined as the Contract Capacity (or another similar term) under the specific contract's terms and conditions. Generators should record this Contract Capacity (or the respective equivalent term) as the total capacity (MW) to be supplied under the applicable contract, obligation, or agreement.

2.2.11 How is confidentiality handled in the Attestation Forms?

Information provided in the Attestation Forms, unless already public, is treated as confidential by the IESO. This information remains the joint property of the Eligible Generator and the Eligible Purchase Customer (except potentially the information contained in the workbooks as described in FAQ #2.2.12 below). The IESO will use or disclose the information only as needed to administer the C-PPA Framework as further set out in the Attestation Forms or where disclosure is required by law, including the Freedom of Information and Protection of Privacy Act of Ontario.

For the full confidentiality provisions, please refer to the Attestation Forms (Pre-base Period Attestation Form sections 4(7) and 5(8), and Post-base Period Attestation Form sections 3(7) and 4(9)).

2.2.12 How does the IESO treat confidentiality for the Generator Workbook and the Purchase Customer Workbook?

The workbooks contain facility specific information and may be submitted either with the Attestation Forms (i.e. jointly) or confidentially by an individual participant, as described in the Prescribed Forms.

In general, workbook information is treated the same way as information submitted through the Attestation Forms (i.e. as the joint property of the Eligible Generator and the Eligible Purchase Customer as described in FAQ #2.2.11 above). The only difference is when a workbook is submitted confidentially by one participant. When this occurs, the IESO will not share that workbook or any of its contents with the other participant, whether that participant is the Eligible Generator or the Eligible Purchase Customer respectively, except as may be required to administer the C-PPA Framework as described in the Attestation Forms or as may be required by applicable law.

The definitions of both workbooks are provided in the Attestation Forms and in Exhibits G and H to the Pre-Base Period Attestation Form.

2.2.13 How do I submit a workbook confidentially?

A participant who wishes to submit a workbook confidentially must provide it directly to the IESO, separate from the jointly submitted Attestation Forms. The submission must clearly indicate that the workbook is being provided on a confidential basis and the C-PPA arrangement to which the workbook relates.

When a workbook is submitted confidentially in this manner, the IESO will treat it as confidential as between the Eligible Generator and the Eligible Purchase Customer and will not share its contents with the other participant, except as may be required to administer the C-PPA Framework as described in the Attestation Forms or as may be required by applicable law.

2.3 Additional Questions

2.3.1 Can my generation facility have a portion of its capacity committed to the capacity auction or any IESO contract, and another portion committed to an Eligible Purchase Agreement under the C-PPA framework?

Yes, generation facilities can have a portion of their electricity generation committed to an Eligible Purchase Agreement under the C-PPA framework, while another portion is committed under a separate IESO contract or program, such as the capacity auction. However, the portion of electricity committed to the Eligible Purchase Agreement under the C-PPA framework cannot be Compensated Electricity, that is, it must not have already been paid for, credited, or committed under another agreement (including capacity auction commitments).

This allocation does not require separate metering. A single meter may be used, provided the allocation of electricity between agreements or commitments can be clearly demonstrated.

2.3.2 Can I have multiple Eligible Purchase Agreements under the C-PPA framework?

Yes, an Eligible Purchase Customer or Eligible Generator could have multiple Eligible Purchase Agreements under the C-PPA framework, provided that the electricity committed under each Eligible Purchase Agreement is not classified as Compensated Electricity.

In situations where an Eligible Generator has entered into multiple C-PPAs, or has other agreements or commitments under a contract or program, and the applicable Eligible Generation Facility is equipped with a single meter, the following will apply:

- The total electricity measured by that meter and supplied to the IESO grid or distribution system will be allocated across all applicable agreements or commitments.
- The allocation will be based on the amounts specified in each agreement or commitment.

2.3.3 Can the generation facility store the electricity that is being purchased under the Eligible Purchase Agreement?

No, the generation facility cannot store electricity that is being purchased under an Eligible Purchase Agreement. Electricity purchased under an Eligible Purchase Agreement must be physically supplied into the IESO-controlled grid or distribution system without first being temporarily stored in an energy storage device or facility.

2.3.4 How are Eligible Generators with C-PPAs settled?

Eligible Generators are settled in the IESO-administered markets for all electricity physically supplied into the IESO-controlled grid or a distribution system. In addition to this, C-PPAs are settled directly between the participating parties on a periodic basis, in accordance with the terms of the agreement. The IESO expects that the Eligible Purchase Customer and Eligible Generator each settle the market price through the IESO administered market and separately settle the difference between the strike price and the market price, consistent with how virtual PPAs typically work in other markets.

2.3.5 Who qualifies as a customer eligible to participate in the ICI program?

Customers who are eligible to participate in the ICI program may include:

- Customers in the manufacturing and industrial sectors, including greenhouses (with NAICS codes commencing with the digits "31", "32", "33" or "1114") with an average monthly maximum hourly demand greater than 500 kW and less or equal to 1 MW during the applicable base period.
- Customers with an average monthly maximum hourly demand greater than 1 MW but less than or equal to 5 MW during the applicable base period. Customers in this category need to opt-in to the program.
- Customers with an average monthly maximum hourly demand greater than 5 MW during the applicable base period. Customers in this category are automatically entered into the ICI program and need to opt-out if they wish to be treated as a Class B customer for the applicable base period.

2.3.6 How are the Peak Demand Factor and Global Adjustment calculated for Eligible Purchase Customers with multiple delivery points?

Since Global Adjustment (GA) is settled at the delivery point level, any demand reduction from an Eligible Generator will be distributed proportionally across an Eligible Purchase Customer's delivery points, based on measured withdrawal at each delivery point during the peak hour.

Example:

An Eligible Generator injects 1 MW during one of the top 5 peak hours. The load facility has three delivery points with the following withdrawals during that hour:

- Delivery Point 1: 1 MW
- Delivery Point 2: 2 MW
- Delivery Point 3: 3 MW

Total withdrawal = 6 MW.

The 1 MW reduction is distributed proportionally:

- Delivery Point 1: $(1/6) \times 1 \text{ MW} = 0.167 \text{ MW}$
- Delivery Point 2: $(2/6) \times 1 \text{ MW} = 0.333 \text{ MW}$

- Delivery Point 3: $(3/6) \times 1 \text{ MW} = 0.500 \text{ MW}$

2.3.7 How is the Peak Demand Factor (PDF) calculated for a customer with a C-PPA? Is it based on actual generation during the top five peak hours or on the contracted capacity?

The PDF calculation is based on actual generation during the coincident peak hour, not on the contracted capacity. For example, if a facility has a 1 MW C-PPA and the solar farm generates 0.6 MW during the peak hour, the PDF would reflect a 0.6 MW reduction for that hour, all else being equal.

2.3.8 How does billing change for a LDC-connected Class A customer when they transition from being a non-market participant to a market participant?

As a market participant, electricity charges will be billed by the IESO instead of your Local Distribution Company (LDC). Charges include commodity, wholesale market service, wholesale transmission, and other associated charges. Distribution-related charges may still apply through your LDC. For more details, please visit the [Guide to Wholesale Electricity Charges](#).

Transitioning requires coordination with your LDC, the IESO, and your Meter Service Provider to address operational, metering (e.g. retail to wholesale), regulatory (e.g. Class A transfer), and other applicable requirements.

For more information on becoming a market participant, please contact IESO Market Registration at market.registration@ieso.ca.

2.3.9 Can I request changes to Ontario Regulation 429/04 through the IESO?

No. The IESO administers the C-PPA framework in accordance with Ontario Regulation 429/04, but it does not set or amend provincial policy (which is determined solely by the Government of Ontario). The IESO will collect and share stakeholder feedback with the Ministry of Energy and Mines.

2.3.10 Is the IESO able to provide a definitive interpretation of Ontario Regulation 429/04?

No. While the IESO administers the C-PPA framework in accordance with Ontario Regulation 429/04 and provides this FAQ and related materials to explain how those requirements are expected to be applied in IESO processes, the IESO is not the regulatory authority that is ultimately responsible for interpreting or overseeing compliance with the regulation (which is the Ontario Energy Board). Relatedly, parties should be reminded that each circumstance is unique and would need to be considered at the relevant time.

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