

Feedback Form

Long-Term 2 RFP – April 21, 2026

Feedback Provided by:

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Date: May 8, 2026

To promote transparency, feedback submitted will be posted on the Long-Term 2 RFP engagement page unless otherwise requested by the sender.

- NO - There is confidential information, do not post**
- YES - Comfortable to publish to the IESO web page**

Following the April 21st Long-Term 2 RFP 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 [Long-Term Procurement engagement webpage](#).

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 8, 2026.

Transparency and Information Disclosure

Do you have feedback on whether the IESO should publish additional non-price information about proposals that were not selected in LT2 Window 1?

The IESO should publish additional non-price information about proposals that were not selected in LT2 Window 1, mainly location, size, and technology. This information would help proponents better assess the relative competitiveness and deliverability of their projects in advance of bid proposals – sharpening the pencils of the more competitive projects, while allowing uncompetitive projects to be dropped without further costs incurred. This is of particular importance with an RFP that is expected to be oversubscribed by a large margin once again.

Do you have feedback on the potential benefits and risks of increased transparency for unsuccessful proponents in future procurement windows?

See answer above re. benefits.

Repowering Eligibility Framework

Do you have feedback on the proposed requirement that facilities complete a minimum of three years of a medium-term contract before becoming eligible for repowering?

The IESO should ensure there is a pathway to participation for resources that are coming off of contracts that exceed 20 years – one that doesn't necessitate the completion of a 3- to 5-year Medium-Term RFP contract.

For instance, it would be wholly inappropriate for the IESO to assume that an asset that signed a 40-year OEFC contract in the '80s would have useful operating life at the end of that contract, let alone 3 to 5 additional years. As such, the IESO should not require these assets to complete a 3- to 5-year Medium-Term RFP contract before competing to repower, especially when MT RFP prices and term may not support the capital investment required to keep that facility operating. **Exempting these facilities would be as simple as setting a minimum asset age requirement to repower, such as 23 years (based on the IESO's latest proposal). Doing so would allow the IESO to remove the requirement that off-contract assets participate in a MT RFP before being permitted to repower, as there may be resources that have operated for 3 years beyond their original contract, but did so under the Capacity Auction or even merchant. If the MT participation requirement is to ensure all asset life is squeezed out of an existing resource before repowering, then the asset age requirement does so more effectively.**

Given the 5-year Medium-Term contract length may not support the capital investment required to keep a facility running, and a full repower may not be feasible given the evolving regulatory landscape, Northland Power supports the exploration of extended MT RFP lengths that provide a contracting term between the current 5-year MT and 20-year LT. An extended MT term length option becomes increasingly important if the IESO extends the initial LT contract to asset life (30-years, for

instance), as greater investment will be required at the end of an extended initial contract, thus necessitating the increased certainty provided by a longer MT contract.

Do you have feedback related to scenarios where repowering work may overlap with existing contract obligations?

Alternate Eligibility Pathways for Repowering

Do you have feedback related to specific existing facilities that do not fit into the proposed repowering framework and may justify an alternate pathway? Please include as much detail as possible (technology type, facility age, contract history etc.).

Recognizing that such details are important to the IESO's decision making in this matter but potentially also commercially sensitive to asset owners, please feel free to mark such details as confidential on this form or, alternatively, reach out to the IESO by email to schedule a meeting to discuss your situation.

As described above, there will be several assets coming off their original contracts that exceed 20 years in length, some being as long as 40 years. It would be inaccurate for the IESO to assume that these aging assets have additional years of life remaining beyond their extended initial terms, absent significant capital reinvestment. Given the age of these assets, they're prime candidates for repowering; The IESO must ensure these assets have a path to participating in the Window 2 without the requirement to complete a Medium-Term obligation. As previously mentioned, switching to a minimum asset age requirement would achieve this outcome. Absent that, longer Medium-Term commitments need to be explored to provide the necessary certainty to allow these facilities to make the capital investments needed to continue reliable operations.

Definition of Repowering

Do you have feedback on the definition of repowering? i.e., on the potential use of technology specific equipment replacement thresholds to define repowering?

We support the IESO's non-prescriptive, performance-based framework for defining repowering, anchored by independent engineer certification and LT2 contract performance obligations.

Repowering Guardrails and Risk Mitigation

Do you have feedback on the use of enhanced independent engineer certification as a key safeguard for repowering projects?

Do you have feedback on the potential application of modified or increased performance security requirements for repowered facilities?

Existing security requirements are significant and sufficient to ensure projects are advanced in good faith. There are diminishing returns to increasing security amounts, to the point that high securities may actively disincentivize participation of good projects, that nevertheless have execution risks that cannot be completely eliminated or hedged.

Do you have feedback on whether these proposed guardrails are sufficient to manage performance and longevity risks?

Deliverability Guidance and Timing

Do you have feedback on the IESO's proposed phased approach to deliverability guidance updates for LT2 Window 2?

Deliverability guidance published as soon as possible following procurement results or certainty around a transmission upgrade proceeding should be the standard the IESO strives for. Development cycles are long so guidance is required well in advance of the procurement windows themselves.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Northland Power supports separate targets and competitions for repowering and new projects, at least in terms of the capacity stream, where gas facilities looking to repower would be competing against new storage facilities. While this may be the appropriate way to procure the cheapest short-duration capacity, absent separate competitions, the IESO would need to recognize and value gas' additional operating qualities (duration, for example) and its dual role as an energy resource.