

Feedback Form

Long-Term 2 RFP – February 24, 2026

Feedback Provided by:

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Date: March 13,
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 February 24th 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 March 13, 2026.

Procurement Timelines

LT2 Window 2 Proposal Submission

Do you have any feedback on the proposed timing for proposal submission?

Northland Power supports the revised proposal deadline and Milestone COD deadline.

General Framework

Contract Term

Do you have any feedback on the proposed contract term for repowering under the Long-Term RFP?

To the extent the IESO believes the useful life of existing assets is greater than the 20 years typical for most assets' initial contract, it may consider offering future contracts that match that asset life. Matching contract terms to asset life allows for optimal project financing structures, lowering overall costs while spreading those costs over more years. Indeed, British Columbia and Quebec have already moved to 30-year contract terms to better align with asset life.

Resource Eligibility

Repowering

Do you have any feedback on the proposed eligibility requirements and definition of repowering?

The IESO's assumption that assets coming off their initial 20-year contracts have, at minimum, five years of useful operating life left, will be true in some cases, but not necessarily in all.

Extending that logic beyond 20-year contracts that were designed and executed by the IESO is an even shakier assumption. 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 five additional years. As such, it would be inappropriate for the IESO to require these assets to complete a 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.

To that end, 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.

Target and Competition Mechanics

Do you have any feedback on the proposed competition mechanism for new and repowered facilities?

Northland Power supports separate targets and competitions for repowering and new projects. This is particularly important in 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 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.

Mandatory Requirements

Do you have information to share with the IESO to further inform the mandatory requirements framework as it relates to repowering of existing facilities? E.g., in the areas of exemptions, municipal and Indigenous support resolutions requirements, and agricultural land and other environmental permitting.

For potentially extended MT commitments, no mandatory requirements beyond what is present in the current 5-year MT contract should be added.

Existing facilities that were approved and constructed under previous agricultural land-use regimes should not be subject to the same agricultural land-use restrictions as new projects. Doing so would unnecessarily exclude existing projects already embedded in the environment and community.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

Northland Power shares CanREA's concerns with respect to the proposed large gap between the publication of Deliverability Guidance documents. Publication of Deliverability Guidance would be most useful as soon as the IESO has incorporated the results of LT2 window 1, leaving the longest runway before the window 2 proposal deadline.