Feedback Form

North of Sudbury Bulk Planning Update Webinar

Feedback Provided by:

Name: Brandon Kelly

Title: Director, Regulatory and Market Affairs

Organization: Northland Power Inc.

Email: [redacted]

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To promote transparency, the submitted feedback will be posted on the South and Central Bulk Plan engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback following the May 20, 2026, presentation of the draft recommendations for North of Sudbury Bulk Plan. A copy of the presentations as well as recordings of the sessions are available on the engagement web page.

Please submit feedback to engagement@ieso.ca by June 10, 2026.

North of Sudbury Bulk Plan - Feedback

The May 20, 2026, webinar focused on the draft North of Sudbury Bulk Plan recommendations as presented. With the plan objectives and scope established, we are seeking feedback on clarity, understanding, and considerations important to note as the plan moves toward finalization.

Question	Feedback
What additional data or context would help provide more clarity and for consideration in the final report?	
What questions or concerns do you have about the draft recommendations that the IESO might consider in future planning activities?	
What additional data or local considerations should the IESO be aware of in finalizing the draft recommendations, or for future planning?	

General Comments/Feedback

Northland Power Inc. (Northland) appreciates the opportunity to provide feedback on the *IESO's North of Sudbury Bulk Plan – Draft Recommendations* materials, as well as the discussion that took place during the IESO's May 20, 2026 presentation.

Overall, we support the IESO's proposed transmission developments, as well as the structured, phased approach to addressing the reliability challenges of meeting demand growth and integrating future supply. In particular, we support:

- The need to address end-of-life concerns on grid infrastructure
- The emphasis on strengthening the 230 kV backbone for locations that currently rely heavily on the 115 kV system
- Recognition that transmission and supply resources must evolve in a complementary way
- The staged approach that preserves flexibility while enabling near-term action

In addition to these initiatives, Northland believes that to maximize the benefit of transmission investment, the local grid needs to be supplemented with dispatchable, non-energy limited

supply. Doing so would provide much needed reliability benefits beyond what can be accomplished by transmission alone, while potentially deferring the need to make the additional transmission investments contemplated in Phases 2 and 3 of the plan. Furthermore, this dual transmission and supply approach would better prepare the area for an uncertain future with a wide range of outcomes, including large load growth beyond what's currently considered.

Importance of reliable dispatchable capacity

In the bulk plan, the IESO identified that not all installed generation provides dependable, all-hours capacity and energy. Hydro resources, particularly those located north of Sudbury, are energy-limited with considerable seasonal variation. Solar resources are intermittent and their daily production profiles are an ill fit for the flat daily load profile in the region. Storage is energy limited and potentially constrained by limits on the quantity of Inverter-Based Resources (IBRs) permitted in the North. Gas generation has none of the aforementioned concerns, and in addition to being a provider of "dependable capacity" (per the IESO's planning document), provides a number of additional benefits:

- Provides firm, dispatchable, sustained, non-energy limited generation
- Is available any time, including peak demand periods and contingency events
- Supports voltage control and local system stability
- Responds to fluctuations in hydro production, local demand, and intermittent renewables generation

These capabilities are particularly valuable north of Sudbury, where:

- Varying hydro generation (and in future, wind and solar awarded through LT2) cause large swings in flows, necessitating fast ramping response from other local resources
- Industrial loads (e.g. mining) have relatively flat and high demand profiles, necessitating stable, high availability generation around the clock and year-round
- A sparse transmission network places heavy reliance on local resources to meet demand and reliability needs during planned and forced outages

Integrating dispatchable resources with transmission

We strongly support the IESO's conclusion that transmission and supply resources must work together to ensure reliability. In our view, dispatchable, non-energy limited resources provide the greatest value when it is coordinated with planned transmission reinforcements, particularly those identified in Phase 1 of the bulk plan. Integrating local, dispatchable, and non-energy limited resources can:

- Enhance the value of transmission reinforcements by reducing reliance on long-distance energy transfer and improving system performance during outages
- Support flexible operations by providing controllable output, voltage support, stability in weaker areas of the grid, and reducing reliance on remedial action schemes

We understand that the IESO considered non-wires alternatives when assessing potential solutions, but determined that there were technical reasons limiting their effectiveness. For instance, in the case of battery storage, the IESO concluded it, "can shift energy over short periods but adds to load during charging and does not address all-hour reliability needs". In the case of gas-fired resources, the IESO noted that it may be "constrained by deliverability and uncertainty as existing contracts expire." We note that contractual status is not a technical impediment, but a commercial one, and should not be an impediment to seeking a least cost solution.

As far as the deliverability of gas-fired generation, it's far less of a concern for existing assets given their current status as deliverable. In any event, the IESO's Phase 1 work will enable greater deliverability in the region. Given that, it's important that the IESO also conduct an assessment of non-wires alternatives assuming the Phase 1 transmission reinforcements are in service. In doing so, the IESO may find that non-wires alternatives are more cost effective and timely than current Phase 2 and 3 proposed solutions. We recommend that the IESO conduct such an assessment and adjust the bulk plan accordingly.

Greater clarity on timelines and triggers for transmission

While we support the phased approach of the plan, we note that the specific timelines and triggers for each phase of the transmission plan are currently only described at a very high level. Greater clarify would greatly enhance the plan by:

- Providing more detailed definition of the system conditions or thresholds (e.g. MW of demand in specific locations or specific generation procurement outcomes) that would trigger advancement of the proposed Phase 2 and 3 solutions
- Identifying the expected timelines for the triggers based on the current forecast
- Integrating further analysis on how the timelines and triggers would change if different levels of dispatchable gas-fired generations were procured locally in the North of Sudbury area. This would be similar to an assessment of the impact of non-wires alternatives.

Providing more transparency on the above can enable better coordination between transmission and generation developments, reduce uncertainty in a region experiencing significant economic growth, and support investment planning by market participants.

Conclusion

We commend the IESO for developing a thoughtful and comprehensive bulk plan to address the complex system challenges north of Sudbury. The plan clearly demonstrate that transmission and local resources can work together to deliver a reliable and efficient system. In that spirit, we recommend that the IESO conduct an assessment of non-wires alternatives assuming the Phase 1 transmission reinforcements are in service, and report back to stakeholders. In doing so, the IESO may find that non-wires alternatives are more cost effective and timely than current Phase 2 and 3 proposed solutions, and the bulk plan can be adjusted accordingly.

We appreciate the opportunity to work together to improve the planning outcome and build a reliable, resilient, and efficient system that meets the near-term needs and long-term growth of the region.