

Feedback on Draft NERC 2026 Business Plan & Budget

Electricity Canada's member companies generate, transmit, distribute and market electric energy to industrial, commercial and residential customers across Canada and into the U.S. every day. These entities include provincially owned and investor-owned utilities; independent power producers; independent system operators; wholesale power marketers; and municipally owned local distribution companies. Several Electricity Canada members also own assets in the United States.

We thank NERC for the opportunity to provide feedback on the draft NERC 2026 Business Plan & Budget. We hope that the following comments are informative in finalizing them for 2026.

Bridge Year Approach

Electricity Canada recognizes that there have been significant transitions recently, both internal and external to NERC, and we appreciate NERC's rationale in approaching 2026 as a bridge year.

We are reassured to see that the three-year planning model will continue after 2026, and that its value is recognized. The move towards a longer-term planning horizon has been very helpful in providing some certainty to industry. Even when unexpected priorities arose, the plan offered a common reference and baseline for discussions about how to proceed. While we recognize that longer horizons mean unexpected challenges will arise, there is still value in how the plan supports prioritization and decision making, and signals the trajectory of work to industry and regulators.

Rising Industry Costs

Electricity Canada appreciates that the budget increase proposed for 2026 is lower than previous projections, which is appropriate to a more constrained scope of planning for the bridge year. At the same time, we do wish to emphasize that the trajectory of consecutive, above-inflation increases is concerning to members.

Assessed entities do not all share the same mechanisms for passing along costs. We strongly encourage NERC to continue its engagement with policymakers and regulators so that there is clarity around this element of rising costs they are being asked to review and approve.

Closing Comments

We appreciate NERC's stakeholder engagement regarding the draft 2026 Business Plan and Budget. We trust that this dialogue can contribute to its development, and that the issues outlined in this letter will be given due and fair consideration.

Dated: June 23, 2025

Contact: Francis Bradley, President & CEO, Electricity Canada (Bradley@electricity.ca)