

Stakeholder Feedback and IESO Response

Capacity Accreditation for IESO

Following the September 17th 2026, Capacity Accreditation for IESO webinar, the IESO invited stakeholders to provide comments and feedback on the materials presented by October 1st 2026.

IESO has provided the consolidated responses below addressing the principal themes identified in the submitted comments. The presentation materials and stakeholder feedback submissions have been posted on the engagement webpage for this engagement. Please reference the material for specific feedback as the below information provides excerpts and/or a summary only.

Transparency and Methodology

Stakeholder Feedback	IESO Response
How can the accreditation methodology be made sufficiently transparent for stakeholders to understand, validate, and trust the results?	The IESO recognizes that transparency and information sharing is important. At the October 22 nd engagement session, the IESO will discuss some potential options it has identified to help improve transparency and seek stakeholder input on additional options they propose.
What assumptions, inputs, modelling approaches, and reference-system conditions should be publicly disclosed?	The IESO is considering publishing the MRI values for resources as well as the inputs and assumptions that have the greatest impact on accreditation values. This would include information about the reference system such as demand and resource mix, resource class characteristics, and the reliability metric used. This will be discussed further at the upcoming engagement session on October 22 nd .

How can stakeholders be meaningfully involved in reviewing and challenging accreditation assumptions before implementation?	The IESO plans to publish the detailed methodology, key assumptions, and supporting inputs used to develop accreditation values. The Annual Planning Outlook (APO) will serve as the base case, providing stakeholders with access to the supporting information published as part of the APO. Altogether, this will provide stakeholders with visibility into how the values are calculated, the factors drive the results and how values may change as system conditions evolve.
Why does the IESO not separately disclose the dependable capacity of the Sir Adam Beck Pump Generating Station, and should it do so to ensure transparency and accurate comparisons between hydro, pumped storage, and battery storage resources?	The IESO does not publish dependable capacity or capacity-contribution values for individual sites or generating stations. The Sir Adam Beck Pump Generating Station is included within the overall hydroelectric fleet and is therefore not reported separately.
Will the IESO publish detailed technical studies for hydroelectricity similar to those produced for battery storage?	The IESO does not currently plan to publish a detailed technical study for hydroelectric resources. While capacity accreditation is possible for hydroelectric facilities, assessing the reliability contribution of potential hydroelectric facilities would require site specific data to characterize availability due to their energy limited nature.
How will climate-driven hydrological risk be reflected in hydroelectric accreditation?	The IESO does not currently plan to include hydroelectric resources in the capacity accreditation study.

Predictability and Investment Certainty

Stakeholder Feedback	IESO Response
How can the IESO provide accreditation values early enough to support investment, financing, and bidding decisions?	Ultimately, the IESO must ensure that the resources it procures are expected to meet reliability needs. However, the IESO also recognizes the needs of prospective RFP Proponents with respect to investment, financing, and bidding decisions and the importance of maintaining a robust project development pipeline. The IESO will, therefore, continue to work with stakeholders as it considers how to factor the

	outcomes of the capacity accreditation analysis into procurement design.
What update process would provide market participants with confidence that accreditation values will not change unpredictably over time?	Accreditation values are expected to change over time as the supply mix, demand, and system needs evolve. The IESO plans to update values on a regular cadence, allowing market participants to track how values evolve and plan accordingly.
How can the accreditation framework balance adaptability with the need for long-term regulatory certainty?	MRI values need to reflect changes in Ontario's demand, resource mix and needs. At the same time, participants need enough certainty to make investment and bidding decisions. A clear methodology, a defined schedule for recalculating values, clear communication of updated values and on when those values apply could provide certainty around the process, even though the values themselves evolve. The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.

Timing and Implementation Readiness

Stakeholder Feedback	IESO Response
Is the IESO ready to implement a new accreditation methodology for LT2 Window 2, or should implementation be deferred to a later procurement cycle, i.e. Window 3?	As noted above, the IESO must ensure that the resources it procures, including through the LT2 Window 2 RFPs, are expected to meet its reliability needs beginning in 2032. However, the IESO also recognizes the challenges that may arise if a new capacity accreditation process is introduced to quickly. The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
What evidence would demonstrate that stakeholders have had adequate time to understand and adapt to the new framework?	The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
Should a phased transition approach be used to reduce disruption and procurement risk?	The IESO is considering a number of approaches to implementing a capacity accreditation framework in its procurements. The IESO will continue to work with stakeholders as it considers how to factor the

	outcomes of the capacity accreditation analysis into procurement design.
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Reliability-Based Accreditation

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How does capacity accreditation measure a resource's true contribution to system reliability rather than relying on installed or historical capability?	Capacity accreditation translates installed capacity into the amount expected to contribute to resource adequacy. Under the proposed MRI approach, the IESO would probabilistically measure the change in Loss of Load Expectation (LOLE) from adding an increment of a resource and compare it with the change from adding the same amount of perfect capacity. This allows system conditions and interactions to affect the result.
How can MRI more accurately measure the reliability contribution of different resource types?	MRI evaluates every resource class against the same perfect-capacity benchmark while retaining the characteristics that affect how the resource contributes to reliability. These may include forced outages, duration, and energy limitations. The resulting value therefore reflects the reliability benefit of the resource under the modelled system conditions, rather than installed capacity or historical availability.
What are the advantages and risks of adopting a Marginal Reliability Impact (MRI) approach?	MRI provides a forward-looking assessment that reflects system conditions and the incremental value of additional resources. It also uses a fixed set of model runs, reducing the process burden relative to iterative approaches such as ELCC. The main challenges are its modelling complexity, dependence on reference system assumptions, and the potential for values to change as the system evolves. Overall, the benefits of adopting MRI are expected to far outweigh the risks outlined, as it provides a more accurate and efficient representation of each resource's contribution to system reliability. This is consistent with the broader industry shift towards marginal, probabilistic capacity accreditation approaches.

Procurement Design and System Needs

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How will accreditation results influence procurement targets, evaluation criteria, and resource selection?	In general, accreditation values can affect how much installed capacity is required to meet needs and how different resources contribute toward the resultant procurement target. The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
Can accreditation alone ensure the procurement of the resources needed for reliability, or should separate procurement streams be maintained for different attributes?	The sole purpose of the IESO's procurement activities is to ensure that it secures sufficient resources to meet expected future reliability needs. Any changes to procurement processes will continue to hold reliability as the top priority. The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
Can procurement be considered fair if resource-specific accreditation values are unknown when bids are prepared?	The IESO will be careful to maintain fairness as it considers the implementation of this capacity accreditation methodology into its procurement processes.
How can procurement processes remain technology-agnostic while still securing the reliability attributes the system requires?	A common reliability-based framework for accreditation can compare different technologies while retaining the characteristics that affect each resource's contribution. Using the same methodology and benchmark across resource types supports a consistent comparison, while still reflecting differences in availability, duration and energy limitations.

Alignment with Planning and Resource Adequacy

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If accredited capacity values materially change, how will planning assumptions and procurement targets be adjusted?	Accreditation values are based on the reference system and will change as demand, the resource mix and needs evolve. The most recent reference system available at the time of the analysis would be used, with reference systems updated at least

	annually. An updated system would inform the procurement targets, and the resulting accreditation values would be reflective of the capacity needed to meet the applicable needs. The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
How can accreditation better support long-term system reliability and affordability objectives?	It can support long-term reliability by more closely aligning accredited capacity with expected contribution under future system conditions. It can also support affordability by reducing the risk selecting an unnecessarily costly resource mix.

Recognition of Diverse Resource Types

Stakeholder Feedback

IESO Response

How can accreditation fairly compare resources with different operating characteristics, such as gas generation, storage, renewables, demand response, hydro, and nuclear resources? Will pumped storage be assessed separately from Hydro?	The proposed MRI approach applies the same calculation, assumptions, and perfect capacity benchmark across all resource classes, while reflecting the operating characteristics represented for each class. The resource classes evaluated through capacity accreditation will be selected according to the applicable procurement.
How will hybrid resources and integrated resource configurations be assessed?	Hybrid and integrated resource configurations were not included in the initial analysis. The IESO has not yet developed an approach for hybrid resources.
Should accreditation explicitly account for portfolio diversity and complementary resource interactions?	MRI assesses an incremental resource within the broader modelled system, which already reflects the diversity and operating characteristics of the existing resource mix. The resulting value therefore captures whether the resource complements the portfolio or provides reliability benefits that are already being supplied by other resources.
For a resource whose fuel is inflow, does UCAP overstate the reliability value of its incremental capacity?	The source of fuel isn't what drives UCAP overstating reliability value, it's the fact that a hydroelectric unit is energy limited that leads to UCAP overstating marginal value. This is similar to all forms of storage, wind, solar, and energy limited thermal units.

Market Confidence and Competition

Stakeholder Feedback	IESO Response
What steps are needed to ensure accreditation reform strengthens rather than weakens investor confidence?	The IESO recognizes the importance of regular, predictable, and transparent information sharing in maintaining investor confidence, and will, furthermore, stakeholder any changes to its procurement processes relating to capacity accreditation.
How can procurement stability be preserved while introducing a fundamentally new accreditation framework?	The IESO has used versions of capacity accreditation in numerous past and ongoing procurement initiatives, including the ongoing MT RFP series and its annual capacity auction. The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
Could late-stage changes to accreditation rules reduce competition, increase costs, or discourage participation?	The IESO would be reluctant to introduce changes to its procurement processes that would reduce competition, increase costs, and/or discourage participation.

Fairness and Consistency

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How can the transition to a new accreditation approach avoid disadvantaging proponents that have already invested under existing rules?	The IESO will continue to work with stakeholders as it considers how to factor the outcomes of the capacity accreditation analysis into procurement design.
How should accreditation methodologies be applied consistently across all resource types and technologies?	MRI applies the same calculation and perfect capacity benchmark across resource classes while retaining the operating characteristics relevant to each class and applying a common reliability framework.
How can the framework ensure that performance risks are not double-counted for certain resources?	The methodology will clearly outline the performance risks reflected in the accreditation calculation for each resource class. This will help identify where those risks are already accounted for and ensure that any additional procurement evaluations address separate risks rather than applying overlapping ones.

Learning from Other Jurisdictions

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What lessons can Ontario learn from jurisdictions that have adopted ELCC or similar reliability-based accreditation frameworks?	The IESO reviewed accreditation approaches used in other North American jurisdictions and calculated Ontario's values using UCAP, ELCC, MRI and DLOL. The review showed an industry wide move toward probabilistic, forward-looking accreditation methods. The main lesson for Ontario is that the methodology should be selected and implemented as part of the broader planning and procurement framework, rather than considered in isolation. The recommendation of MRI followed the IESO's evaluation of the approaches against the considerations established in the previous engagement and the results produced for the Ontario system.
Which accreditation practices have proven effective elsewhere, and which pitfalls should be avoided?	The jurisdictional review found that probabilistic, forward-looking approaches are being used or developed in several regions. The California Public Utilities Commission, PJM Interconnection and Southwest Power Pool use ELCC; the Midcontinent Independent System Operator is moving toward DLOL; the New York Independent System Operator and ISO New England are moving towards an MRI framework. For Ontario, the methodology and update process will need to be efficient enough to align with IESO procurement timelines and processes. Transparency will also be important, including a clear explanation of methodology, assumptions and inputs.
How can Ontario align with North American best practices while accounting for its unique system conditions?	The IESO is evaluating the accreditation approaches used across North America, together with the timelines and processes required to develop, update and apply the resulting values. This allows IESO to assess each approach against Ontario's system conditions, needs and timelines, rather than adopting a framework directly. MRI is currently preferred because it captures system dependence and the incremental impacts of a new resource using a fixed set of model runs,

	providing a better fit with the IESO's procurement processes than iterative approaches such as ELCC.
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