Feedback Form

Capacity Accreditation for IESO – Date, October 22nd 2026

Feedback Provided by:

Name: Catherine Jeffery

Title: Policy Advisor

Organization: Clean Energy Canada

Email: [redacted]

Date: October 30, 2026

To promote transparency, feedback submitted will be posted on the Capacity Accreditation for IESO engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
- X **No – comfortable to publish to the IESO web page**

Following the Capacity Accreditation for IESO October 22 2026, 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 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 October 30th 2026.**

Transparency and Capacity Accreditation

Topic	Feedback
The IESO proposed three measures to provide transparency for stakeholders for use of the MRI capacity accreditation methodology. Are stakeholders supportive of these measures?	Clean Energy Canada is supportive of these measures, but recommends that the IESO conduct continued stakeholder engagement throughout the methodology development process. This should include consultation to share key inputs, assumptions, and other methodological details while providing an opportunity for experts and developers to test those assumptions and suggest changes, ensuring that the final methodology is calibrated accurately. The methodology should capture all relevant reliability limitations across resource types, including outage and fuel supply risks to natural gas generators. ISO New England, for example, discovered a limitation to their modelling of natural gas reliability risks in their development of the MRI methodology, as their grid faces fuel supply constraints during the winter months which had to be incorporated into the model. Clean Energy Canada also recommends that the IESO commit to a regular update cycle so that sector stakeholders can plan accordingly for these updates in their development timelines. In addition, these regular updates should include explanations of changes to MRI values over time to maintain transparency for the sector.
Beyond the three measures proposed, is there anything else you would like to see from the IESO to support transparency on capacity accreditation?	The IESO has outlined that the Marginal Reliability Impact technique is a superior capacity accreditation methodology in principle. However, it has not demonstrated the need for an *immediate* change to the capacity accreditation framework for LT2 Window 2. Procurement requirements for LT2 were already informed by resource adequacy needs identified through the Annual Planning Outlook—in fact, the IESO increased the required duration of capacity resources from 4 to 8 hours to ensure that resources added to the system could provide maximal value. As other stakeholders have pointed out, capacity accreditation provides a market signal that shapes investment decisions.

	Large-scale projects require long development timelines, and changes to the framework during these periods can weaken confidence. Maintaining a stable investor environment and limiting uncertainty will ensure that the IESO secures new resources at the best price possible. Since an accelerated timeline could pose risks to securing affordable, reliable capacity, Clean Energy Canada recommends that the IESO targets implementation for Window 3 and beyond, rather than for Window 2. This would also allow for comprehensive stakeholder engagement (mentioned above) to ensure that the methodology is as transparent as possible. For instance, NY-ISO—one of the grid operators cited in the IESO's presentation—transitioned to the MRI methodology over the course of several months, beginning with consultations in 2022 and only implementing the new methodology in May 2024. ISO New England followed an even longer timeline, beginning stakeholder consultations in 2021, and is still in the transition phase towards the full adoption of an MRI approach. If the IESO chooses to proceed with an accelerated implementation of the new accreditation methodology for Window 2, Clean Energy Canada recommends that it publishes a comprehensive analysis of system conditions to demonstrate that such a rapid change is truly necessary.

General Comments/Feedback