Feedback Form

Capacity Accreditation for IESO – Date, October 22nd 2026

Feedback Provided by:

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Date: October 29, 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?	Yes, OPG is supportive of these transparency measures since these can improve market participants' understanding of how Marginal Reliability Impact (MRI) values are calculated, anticipate changes, identify key drivers, and have a clear timeline for implementation.
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's presentation includes an MRI result for the Toronto zone in the 2032 study year. Given that capacity procurements may have terms ranging from 3 to 20 years, and could eventually expand to the annual capacity auction, greater visibility into MRI assumptions and results would be valuable. OPG seeks clarification on whether the IESO will publish MRI results by study year, season, and load zone. Much of the procured capacity may be located outside the Toronto zone, stakeholders would benefit from understanding whether MRI values differ across zones due to: • Transmission constraints; • Regional demand profiles; and • The location and deliverability of capacity resources.

General Comments/Feedback

Direct Loss of Load (DLOL)

Can the IESO provide a view for the DLOL values for battery resources? The values are significantly lower compared to other resource types.

Clean Electricity Regulations (CER) - Limited Gas Treatment

The IESO presented results for "Gas" and "CER-limited Gas" across the different methodologies assessed. For the CER-limited gas scenario, can the IESO please provide details on how the CER is applied to gas generation units in the calculation of MRI? The CER has an annual limit for emissions from gas generation. Does the MRI apply an algorithm to disaggregate the annual emissions limit into monthly (or seasonal) limits, such that the generation can be reserved for the most needed months? Additionally, the MRI results for CER-limited gas was ~52%. How sensitive is this to using monthly energy limits with carryover versus an annual energy budget optimized to minimize LOLE?

OPG thanks the IESO for endeavoring to develop a framework with the goal of providing a more transparent, consistent, and forward-looking basis for valuing resources' contributions to reliability, and looks forward to continued engagement on this matter.