Feedback Form

Capacity Accreditation for IESO – Date, October 22nd 2026

Feedback Provided by:

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Title: Chair

Organization: Ontario Rivers Alliance

Email: [redacted]

Date: 30 October 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, as a starting point. On their own, they fall short of the IESO's own engagement principles that its work be transparent and traceable. See Section 3 under General Comments.
Beyond the three measures proposed, is there anything else you would like to see from the IESO to support transparency on capacity accreditation?	Yes. See Sections 1 to 3 and the recommendations under General Comments.

General Comments/Feedback

The Ontario Rivers Alliance (ORA) is a grassroots not-for-profit organization with a mission to protect, conserve and restore Ontario rivers. We speak for the people who live on them, fish them, paddle them and pay for the power taken from them.

ORA supports the Independent Electricity System Operator (IESO) in its commitment to transparency and traceability in capacity accreditation and asks that it apply to every resource class without exception. The IESO has left hydroelectric generation out of its accreditation study. ORA respectfully recommends that hydroelectric generation be included in the study, measured by the same methods as every other resource, and that its results be published with the data and the formula behind them.

1. What the study measured, and what it left out:

Capacity accreditation, in the IESO's words, "*translates a resource's installed capacity into the amount that can be relied upon for resource adequacy purposes*".[1] Installed capacity is the most a station can produce. The accredited value is the share of it the IESO counts on when the grid is under stress. That value shapes how much the IESO buys and what ratepayers pay for it.

The IESO has chosen a method called Marginal Reliability Impact (MRI). It compared MRI with the current method, Unforced Capacity (UCAP), and with two others, Effective Load Carrying Capability (ELCC) and Direct Loss of Load (DLOL). MRI compares the reliability benefit of the next block of a resource added to the grid with the benefit of the same amount of perfect capacity, meaning imaginary power that is always available and never breaks down. Its results for the 2032 study year, as a share of installed capacity, are set out below.[1]

Resource class	UCAP	ELCC	MRI	DLOL
Solar	11.33%	19.16%	36.09%	34.06%
Wind	19.25%	19.66%	20.15%	26.59%
Battery, 4 hour	50.00%	10.09%	14.83%	0.25%
Battery, 8 hour	N/A	20.33%	31.29%	0.57%
Battery, 12 hour	N/A	26.27%	37.57%	0.67%
Gas	90.84%	92.96%	94.07%	100.00%
Gas under federal energy limits	N/A	39.93%	52.57%	23.16%
Hydroelectric	**Not shown**	**Not studied**	**Not studied**	**Not studied**

Source: IESO presentation of 22 October 2026, slide 25. The hydroelectric row is added by ORA.

Hydroelectric generation is not in the table. Neither is nuclear. Hydroelectric generation is 9.3 gigawatts (GW), or 24% of Ontario's installed capacity, second only to gas and oil.[2]

ORA asked at the session why hydropower was not in the study. The IESO's David Richardson, Supervisor of Planning Models, gave two reasons. The first was "*we're not aware of kind of any open procurements that would be considering hydro at this point*". The second was that "*hydro is like very site specific*".[3]

ORA respectfully submits that neither reason holds. On the first, no resource of any kind is being procured in Long-Term 2 (LT2) Window 2 yet. The study is preparation for that procurement. The IESO sized each test block at 360 megawatts (MW),[1] a figure Mr. Richardson said was "*tied to what is, I think, currently the expected target for LT2 window two*".[3]

Hydroelectric generation can compete in LT2, which is agnostic to resource type. The last LT2 capacity Request for Proposals (RFP) sought "*up to 600 MW of year-round capacity services*". It was open to any new dispatchable resource of at least 1 MW able to deliver power continuously "*for at least eight (8) consecutive hours*", registered "*other than as variable generation, or as a self-scheduling generation facility*".[4] A reservoir station that the IESO can dispatch can meet that description. The IESO's Long Lead-Time (LLT) RFP, under which hydroelectric generation would be procured, has proposals due on 26 November 2026.[5] The IESO's own response to feedback states: "*The resource classes evaluated through capacity accreditation will be selected according to the applicable procurement.*"[6]

On the second reason, wind and solar are site-specific too. The study still gave each of them a single value, with every new block placed in one zone: "*Incremental resources added in Toronto*".[1] The IESO's own methodology already sorts hydroelectric generation into two groups: "*Hydroelectric generators are modeled as either run-of-river or peaking plants.*"[7] Run-of-river stations use the river's flow as it comes, while peaking and reservoir stations hold water back behind a dam to generate during peak demand. The IESO already sets a hydroelectric value for each zone of the province in its Capacity Auction, an annual auction that pays resources to be available when needed. For 2025, it credited hydroelectric generation with 46% of installed capacity in the Northwest and 67% in Niagara for a summer obligation, against 95% for storage.[8] Niagara is the zone where the Sir Adam Beck pumped storage station sits, and the IESO has not revealed whether its Niagara hydroelectric factor includes that station.

Mr. Richardson also told the session that "*we could kind of throw out a generic one for, you know, an average of what we already have*". He added: "*Well, we do model our existing hydro. So the question is, what would be the contribution of incremental new hydro and that's what this whole approach is.*"[3] The IESO's written response agrees that "*capacity accreditation is possible for hydroelectric facilities*".[6] The IESO's Dave Barreca, Supervisor of Resource Adequacy, added that the LLT RFP is "*past the point where we would make any changes*", and that hydroelectric proposals could be assessed one at a time "*without producing a general result, which would not be meaningful*".[3] ORA respectfully disagrees. Ontario already depends on 9.3 GW of hydroelectric capacity.[2] How much of it can be counted on when the grid is under stress is meaningful to every ratepayer, whether or not a new station is proposed.

The IESO has the data. It has published figures for hydroelectric generation at least four times, using different measures for different regions and years. Its 2015 North of Dryden plan defines dependable capacity as "*98-percentile output*", the output that can be counted on 98% of the time, and puts run-of-river hydroelectric generation at 15 to 30% of installed capacity.[9] Its 2022 report on northeast bulk transmission found the hydroelectric output available 98% of the time to be 22% of installed capacity north of Sudbury, 30% in East Lake Superior and 31% across the Northeast.[10]

Its 2024 Annual Planning Outlook put hydroelectric effective capacity at 70% of installed capacity in summer and 78% in winter, a figure that includes the Sir Adam Beck pumped storage station, in a table that does not appear in the 2025 or 2026 Outlooks.[11],[7] Its Capacity Auction credits hydroelectric

generation with 46% to 67% in summer.[8] None of these is a value for hydroelectric generation under the new method, and none comes with a derivation that anyone outside the IESO can follow. That is neither transparent nor traceable. The lowest figures are for the north, which is where new hydroelectric development is being assessed, including in the Moose River Basin.[12] Mr. Richardson offered a generic value based on "*an average of what we already have*". ORA asks the IESO to produce it, based on the whole existing fleet rather than its best performers, with the stations included listed so that the figure can be traced.

ORA also asked the IESO to report the Sir Adam Beck Pump Generating Station separately from the hydroelectric fleet, because counting it with the hydroelectric fleet can falsely raise the share of that fleet's capacity the IESO counts on. The IESO answered that it "*does not publish dependable capacity or capacity-contribution values for individual sites or generating stations*".[6] ORA is not asking for a site. Pumped storage is refilled by pumping, a hydroelectric station by inflow, and ORA asks that each be reported as a class of its own.

ORA Recommendation 1: That the IESO include hydroelectric generation as a resource class in its capacity accreditation study.

ORA Recommendation 2: That the IESO include nuclear generation as a resource class in its capacity accreditation study.

ORA Recommendation 3: That the IESO base its accredited value for hydroelectric generation on the whole existing fleet, not on a selection of stations.

ORA Recommendation 4: That the IESO list the generating stations included in its accredited value for hydroelectric generation.

ORA Recommendation 5: That the IESO report run-of-river and reservoir hydroelectric generation as separate resource classes.

ORA Recommendation 6: That the IESO report pumped storage as a resource class separate from hydroelectric generation.

ORA Recommendation 7: That the IESO publish an accredited capacity value for hydroelectric generation in time for LT2 Window 2 and any later procurement in which hydroelectric generation is eligible.

2. Showing up when the grid needs it:

The IESO now places hydroelectric generation in the same group as storage, wind and solar. ORA asked whether UCAP overstates the reliability value of a resource whose fuel is inflow. The IESO answered: "*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.*"[6] An energy-limited resource can run only as long as its fuel lasts. For a hydroelectric station, that fuel is the water flowing into the river. The IESO's methodology says the same of peaking stations: "*Peaking plants are treated as dispatchable energy-limited resources.*"[7]

The IESO has measured how the new methods change the value of storage, wind, solar and gas. The change can go either way. Under MRI, a four-hour battery falls from 50% under UCAP to 14.83%, while solar rises from 11.33% to 36.09%.[1] Asked why solar changed so much, Mr. Richardson said it was "*difficult to tease out exactly*".[3] Only a study will show which way hydroelectric generation goes, and the IESO has not done one.

The value of storage matters well beyond the model. CBC News reported on 22 October 2026 that every project approved in Ontario's largest battery storage procurement was 50 percent owned by local Indigenous communities, among them a 200 MW, eight-hour battery to be built with Eagle Lake First

Nation in northwestern Ontario.[13] The company building it told CBC: "*Battery projects really don't use any water for their operations and they don't generate any emissions*".[13] ORA supports battery storage. A discount applied to storage alone would fall on the Indigenous communities now investing in it, while hydroelectric generation goes untested.

Ontario Power Generation (OPG), the province's largest hydroelectric owner, says the new approach will help to maintain "*a balanced system with an optimal supply mix including baseload nuclear and hydroelectric generation*", along with variable resources, storage and gas. It also states that "*future capacity procurements must ensure that energy-backed capacity is the predominant resource selected*".[14] The IESO's response places hydroelectric generation with storage, wind and solar as energy limited.[6] A published value for hydroelectric generation would show which description is correct.

One of the four methods, DLOL, looks only at the hours when the grid runs short. The IESO describes it as "*Weighted expected performance during critical hours*", and says it "*Only considers resource contributions during risk periods*".[1] In other words, it asks how much each resource is expected to produce, in the model, in the hours of shortage.

ORA takes no position on which method is technically best. But DLOL answers the question that matters most for hydroelectric generation: is a station whose fuel is river flow there overnight, and in a dry season, when the grid is short? The IESO ran DLOL for every resource class it studied except hydroelectric and nuclear generation,[1] although the hours of shortage are already in the model, and so is the existing hydroelectric fleet.

ORA also asked how climate-driven hydrological risk will be reflected in accreditation. The IESO answered: "*The IESO does not currently plan to include hydroelectric resources in the capacity accreditation study.*"[6] That does not answer the question, and it does not serve ratepayers' interest.

The IESO's own 2026 Annual Planning Outlook warns: "*As actual weather and seasonal trends diverge from historical trends, supply resources may perform differently from assumed historical performance.*"[2] Ontario's Provincial Climate Change Impact Assessment states that "*low water flows due to drought conditions can reduce hydroelectricity generation*", and rates electrical power generation the only utility category already at high risk from climate change.[15]

The IESO describes MRI as "*a forward-looking and system-dependent assessment*".[1] It looks forward to the grid of 2032, its demand and its resource mix. It does not look forward to the weather of 2032. The study uses the 2026 Annual Planning Outlook base case,[1] and that Outlook "*considers historical production data for hydroelectric*", which it says "*helps to capture the impact of extreme events*".[2] Thirty years of past flows capture past extremes. They do not capture the warming climate the Outlook itself warns of. Its methodology draws run-of-river output from "*a different yearly run-of-river profile from the previous thirty years of data*", and peaking stations from "*the last five years of operational data*".[7] The word climate does not appear in the presentation. The method is forward-looking about the grid and backward-looking about the weather and the water. For a resource whose fuel is water flow, that leaves ratepayers and the economy carrying a risk the IESO's own Outlook has named and yet has not tested for hydroelectric generation.

Hydroelectric generation is also bought through energy contracts, which pay for electricity produced rather than for being available at peak, including the LLT. Asked whether accreditation would reach the energy stream, Mr. Barreca said: "*at this time, we're not proposing assigning capacity values to resources under the energy stream*".[3] Once built, a hydroelectric station bought that way becomes part of the supply the IESO relies on to keep the lights on, and ratepayers are entitled to know at what value it is counted.

ORA Recommendation 8: That the IESO publish the MRI value of hydroelectric generation.

ORA Recommendation 9: That the IESO publish the DLOL value of hydroelectric generation, calculated in the same study as the other resource classes.

ORA Recommendation 10: That the IESO publish the ELCC value of hydroelectric generation.

ORA Recommendation 11: That the IESO publish the values of nuclear generation under each method it studied.

ORA Recommendation 12: That the IESO explain, for each resource class, why its MRI value differs from its UCAP value, beginning with the four-hour battery and solar.

ORA Recommendation 13: That the IESO report each year how much hydroelectric generation actually produced in the hours of greatest system need.

ORA Recommendation 14: That the IESO publish how the accredited value of hydroelectric generation changes in a year drier than the historical record.

ORA Recommendation 15: That the IESO state whether the weather and water-flow inputs to its accreditation study are drawn from the historical record or adjusted for the climate it expects.

ORA Recommendation 16: That the IESO adjust the weather and water-flow inputs used in accreditation for the expected future climate, for every weather-dependent resource, beginning with hydroelectric generation.

ORA Recommendation 17: That the IESO state the capacity value at which hydroelectric generation contracted through an energy stream, including the LLT, is counted toward Ontario's resource adequacy needs.

3. Transparent and Traceable:

The IESO opened this engagement on its own principles. Two of them are that its work be "*Traceable*", meaning to "*Allow everyone to follow the path that is being taken*", and "*Transparent*", meaning to "*Show how engagement helped shape the final outcome*".[1]

The IESO's own evaluation scores MRI "*Low*" on transparency, and UCAP "*High*".[1] It states that "*stakeholders may not be able to independently reproduce MRI values using publicly available information*". Its proposed measures "*would instead allow stakeholders to understand how values are calculated, what assumptions drive them, and why they change*".[1] Understanding a number is not the same as being able to check or validate it. ORA supports the three measures, and asks for the step that would make the values traceable: enough of the inputs to reproduce them, and an independent review. Without that step, the IESO is not living up to the engagement principles it set for itself. Whichever method the IESO adopts, its results must be transparent and traceable, so that ratepayers can be assured they are getting the best value for their dollar.

Others share the concern. Rodan Energy Solutions wrote that "*the leading option in this engagement is also among the least transparent methods under consideration*".[16] Energy Storage Canada wrote that the leading method "*appears to be among the least transparent approaches under consideration*".[17] The Canadian Renewable Energy Association noted that the IESO "*acknowledges that it is difficult to reproduce*".[18] ORA agrees with all three.

The study also leaves things out that the published values will not show unless the IESO says so. "*Transmission constraints and planned outages are not modelled*".[1] Each new block was placed in Toronto. Readers of a published value need to know what those choices do to it.

The IESO has studied the declining value of storage since at least 2025, when it published a technical paper on the subject, and its slides for the LT2 Window 2 session of 14 October 2026 stated: "*The new methodology is expected to show reduced capacity contribution from energy storage due to the IESO having recently procured over 3,500 MW of storage, the shape of the forecast demand curve, and the energy limited attributes of energy storage compared to other resource types.*"[19] The results were

presented eight days later. The IESO has not published one study of hydroelectric generation, which it itself calls energy limited.

Mr. Barreca told the session that some approaches "*could conflict with certain existing government policy*", and that the IESO is "*actively in discussion at the moment right now to try and work that through with them*".[3] At the LT2 session eight days earlier, IESO staff said that how the lower value for storage "*gets translated into RFP rules is another thing*", that some of the options preserve "*the technology agnostic viewpoint*", "*others which do not*", and that "*We're discussing with the government*".[20] Ratepayers are entitled to know which policy is involved and what the IESO is being asked to weigh. Why shouldn't hydro be required to work within the same rules?

The IESO's response answered several of ORA's 1 October questions, and ORA thanks it for that. Others were not answered, among them how the Capacity Auction factor for hydroelectric generation relates to the value the IESO will use in procurement, whether it will again publish effective capacity by fuel type in megawatts as it did in the 2024 Annual Planning Outlook, and ORA's questions on conflict of interest.[21] A traceable process shows what happened to each recommendation.

In ORA's view, hydroelectric generation has for years been the most protected and least transparent resource in the IESO's process. It has not been put through the new test, and it now has a procurement in its own exclusive lane. The Minister's directive behind the LLT energy contract limits it to "*hydroelectric Electricity generating facilities other than pumped hydroelectric facilities*".[22] Under that contract, the IESO "*shall have no interest*" in the facility's Environmental Attributes, which include Clean Energy Credits, until the twentieth anniversary of commercial operation, and receives only half of any proceeds after that. Drought is listed among the "*acts of God*" that count as force majeure, the clause that excuses a supplier when an event beyond its control stops it from delivering. It counts only where its impact "*could not reasonably have been anticipated as at the Contract Date*". The contract runs for 40 years.[22] All of this is offered while Ontario's own forward-looking climate impact assessment rates electrical power generation at high risk from climate change, now and through the 2080s, in every region of the province.[15]

With the Province's own assessment on the record, drought can no longer be called unforeseeable. If the IESO is promising transparency and traceability, hydroelectric generation must be brought into the open and be held accountable. It must prove the baseload role, running steadily around the clock, that OPG claims for it, through the same performance and capacity study as every other energy-limited resource.

ORA Recommendation 18: That the IESO apply all three proposed transparency measures to every resource class, including hydroelectric generation.

ORA Recommendation 19: That the IESO publish enough of the inputs and assumptions for a qualified reviewer outside the IESO to reproduce the accredited values.

ORA Recommendation 20: That the IESO commission an independent review of the accreditation method and its results.

ORA Recommendation 21: That the IESO publish that independent review.

ORA Recommendation 22: That the IESO publish how leaving out transmission constraints and planned outages affects each resource class's accredited value.

ORA Recommendation 23: That the IESO state which existing government policy may conflict with its approach to capacity accreditation.

ORA Recommendation 24: That the IESO publish the outcome of its discussions with government on capacity accreditation before the method is applied in any procurement.

ORA Recommendation 25: That any rule the IESO adopts to reflect the declining value of energy storage in LT2 apply equally to hydroelectric generation.

ORA Recommendation 26: That the IESO state, for each recommendation it receives in this engagement, whether it was adopted and why.

4. Where other participants stand:

Capital Power asked the IESO to clarify "*whether accreditation values will differ by location*".[23] ORA agrees, since every resource in the study was placed in Toronto. Capital Power suggested procurement streams that distinguish between resources with materially different operating characteristics, and Atura Power suggested streams based on the attributes a need requires.[23],[24] ORA asks that any such stream stay open to every resource that meets its requirements, and that the IESO advise government that no resource should be given a stream of its own by directive. Every resource type should compete against every other, which is in ratepayers' best interest.

Brookfield Renewable asked at the session that the IESO make clear that capacity values will not apply to the energy stream.[3] ORA takes no position on that request as it affects wind and solar. ORA asks only that hydroelectric generation bought through energy contracts not escape a published capacity value (Section 2). Hydroelectric generation must compete with every other resource type.

Brandon Kelly of Northland Power cautioned against the IESO "*buying capacity that it thinks it can rely on to solve these needs and that it can in fact not rely on*".[3] ORA agrees and asks that the same caution apply to every resource, hydroelectric generation included. The Pembina Institute observed that "*not all energy sources will be affected equally by the new requirements*".[25] That is why every one of them should be measured.

5. Conclusion:

The IESO has measured what wind, solar, gas and battery storage can be counted on to deliver when the grid is under stress. It has not measured hydroelectric generation, 24% of Ontario's installed capacity, and it now places hydroelectric generation in the same group as storage, wind and solar, whose values moved sharply under the new method. It looks forward to the grid of 2032 and backward at the weather and the water that will be affected by climate change. What is good for the goose is good for the gander: one test, applied to every resource, and published for every resource.

The IESO tells Ontarians its work is transparent and traceable, so that everyone can follow the path being taken. ORA asks the IESO to show that path for hydroelectric generation: the numbers, the data and the formula, set out so that someone who does not work for the IESO can check them. Adopting these recommendations would give ratepayers the same view of hydroelectric generation that the IESO has already given them of every other resource it studied.

Respectfully submitted,

Linda Heron
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OntarioRiversAlliance.ca
[redacted]

Endnotes

1. *Independent Electricity System Operator, Capacity Accreditation for IESO, engagement presentation, 22 October 2026, slides 4, 8, 11, 21, 24, 25, 30, 33, 34 and 43. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAI-20261022-Presentation.pdf*
2. *Independent Electricity System Operator, 2026 Annual Planning Outlook: Ontario's electricity system needs: 2027-2050, March 2026, Figure 8 at page 29, section 7.2.1.4 at page 71 and section 7.2.3 at page*

74. https://www.ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/2026/2026-Annual-Planning-Outlook.pdf

3. *Independent Electricity System Operator, Capacity Accreditation for IESO, public engagement session, 22 October 2026, transcript prepared by ORA from the session audio, at 00:20:21, 00:21:36 to 00:24:42, 00:25:20, 00:37:26 to 00:37:49, 00:39:38 to 00:40:04 and 00:42:18. https://ieso.ca/Sector-Participants/Engagement-Initiatives/Engagements/Capacity-Accreditation-for-IESO-Procurements*
4. *Independent Electricity System Operator, Long-Term 2 Capacity Services (Window 1) Request for Proposals, consolidated with Addenda 1 to 4, 10 November 2025, sections 1.1(a), 1.2(e), 1.2(f), 4.2(d) and 4.2(f). https://www.ieso.ca/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Term-2-RFP*
5. *Independent Electricity System Operator, Long Lead-Time RFP, procurement web page and schedule. https://www.ieso.ca/en/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Lead-Time-RFP*
6. *Independent Electricity System Operator, Stakeholder Feedback and IESO Response, Capacity Accreditation for IESO Procurements, 20 October 2026, pages 2 and 6. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAI-20260917-IESO-response-to-feedback.pdf*
7. *Independent Electricity System Operator, 2026 Annual Planning Outlook: Resource Adequacy and Energy Assessments Methodology, March 2026, section 4.4 at page 16 and section 4.8 at page 17. https://www.ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/2026/2026-APO-Resource-Adequacy-and-Energy-Assessment-Methodology.pdf*
8. *Independent Electricity System Operator, 2025 Capacity Auction Fleet-Level Availability De-Rating Factors. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/ca/ca-Fleet-Level-Availability-De-Rating-Factors-2025.pdf*
9. *Ontario Power Authority and Independent Electricity System Operator, North of Dryden Integrated Regional Resource Plan, 27 January 2015, section 7.1 and Table 7, page 56. https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/North-of-Dryden/North-Dryden-Report-2015-01-27.pdf*
10. *Independent Electricity System Operator, Need for Northeast Bulk System Reinforcement, 27 October 2022, Tables 1 to 3 and the accompanying text, pages 19 and 20. https://ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Northeast-Ontario/ne-bulk-planning-initiatives-20221027-final-report-need-for-northeast-bulk-system-reinforcement.pdf*
11. *Independent Electricity System Operator, 2024 Annual Planning Outlook, March 2024, Table 2, page 34. https://www.ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/Mar2024/2024-Annual-Planning-Outlook.pdf*
12. *Independent Electricity System Operator, North of Sudbury Bulk Plan, 20 August 2026, sections 9.1 to 9.3, at pages 70, 72 and 73. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/nsbp-20260820-north-of-sudbury-bulk-plan-report.pdf*
13. *CBC News, Inayat Singh, Electricity emissions are rising in Canada. Indigenous communities could help, What on Earth newsletter, 22 October 2026. https://www.cbc.ca/news/climate/what-on-earth-indigenous-power-9.7391343*
14. *Ontario Power Generation, feedback form on the Capacity Accreditation for IESO Procurements engagement of 17 September 2026, 1 October 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAIP-20261001-Feedback-Form-OPG.pdf*
15. *Government of Ontario, Ministry of the Environment, Conservation and Parks, Ontario Provincial Climate Change Impact Assessment, Technical Report, 2023, at pages 162, 163 and 165. https://www.ontario.ca/page/ontario-provincial-climate-change-impact-assessment*
16. *Rodan Energy Solutions, feedback form on the Capacity Accreditation for IESO Procurements engagement of 17 September 2026, 30 September 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAIP-20261001-Feedback-Form-Rodan.pdf*
17. *Energy Storage Canada, feedback form on the Capacity Accreditation for IESO Procurements engagement of 17 September 2026, 1 October 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAIP-20261001-Feedback-Form-ESC.pdf*
18. *Canadian Renewable Energy Association, feedback form on the Capacity Accreditation for IESO Procurements engagement of 17 September 2026, 1 October 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAIP-20261001-Feedback-Form-CanREA.pdf*

19. *Independent Electricity System Operator, Long-Term 2 RFP Window 2, engagement presentation, 14 October 2026, slide 21. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/long-term-rfp/lt2-rfp-20261014-engagement-presentation.pdf*
20. *Independent Electricity System Operator, Long-Term 2 RFP Window 2, engagement session, 14 October 2026, recorded presentation, remarks by IESO procurement staff on the evolving value of energy storage. https://youtu.be/H8MvdQkcwz8*
21. *Ontario Rivers Alliance, feedback form on the Capacity Accreditation for IESO Procurements engagement of 17 September 2026, 1 October 2026, Recommendations 6, 8 and 15 to 17. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/CAIP/CAIP-20261001-Feedback-Form-ORA.pdf*
22. *Independent Electricity System Operator, Long Lead-Time Energy Supply (LLT(e)) Contract, consolidated with Addendum 1, 12 August 2026, recitals and sections 2.10, 11.3(a) and the definition of Term. https://www.ieso.ca/en/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Lead-Time-RFP*
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