Feedback Form

Capacity Accreditation for IESO – Date, October 22nd 2026

Feedback Provided by:

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Title: Founder & Principal

Organization: Sedona Renewables Inc.

Email:

Date: October 28, 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**
- ☒ **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.**

SEDONA RENEWABLES INC.
Development | Procurement | Delivery

FORMAL STAKEHOLDER FEEDBACK

Capacity Accreditation for IESO Procurements

October 22, 2026 engagement | Marginal Reliability Impact methodology

Submitted by	Faizan Farooqi | Founder & Principal, Sedona Renewables Inc.
Submission date	October 28, 2026
Consultation deadline	October 30, 2026

Position in brief. Sedona supports resource accreditation grounded in reliability rather than nameplate capacity alone. The proposed Marginal Reliability Impact (MRI) framework can sharpen procurement choices; however, its outputs must be reproducible enough for commercial decisions and explicitly separated from physical deliverability, contract capacity, and community and permitting readiness.

Basis of this feedback. I am Faizan Farooqi, Founder & Principal of Sedona Renewables, drawing on more than 15 years in the power and renewable-energy sector. In owner-side leadership and project delivery roles, I have worked with investors, lenders, technical advisers, legal counsel and asset management teams evaluating technology, contract and schedule risk. Recent industry discussions reinforced how sensitive financing decisions can be to unclear reliability metrics. The views and recommendations expressed here are mine.

Technical findings that require a procurement translation

In the October 22 illustrative modeled case, MRI estimates **14.83%** for a four-hour battery, **31.29%** for eight hours, **37.57%** for twelve hours, **36.09%** for solar and **20.15%** for wind. The same slide compares four-hour battery UCAP at 50%. These are not universal technology constants and are expected to change as the system evolves.

1 | Publish the inputs that drive model results

The IESO notes that probabilistic metrics can be difficult for stakeholders to reproduce from public data. Reproducibility matters because an accreditation factor can alter the apparent economics of an otherwise technically identical resource.

Request. Provide a machine-readable reference input pack or reproducible sensitivity outputs: 2026 APO resource portfolio, hourly load and weather assumptions, loss-of-load risk periods, resource additions, planned and forced outages, interconnection assumptions where modeled, SoC operating strategies and resource increments. Version-control each new set and provide a driver-based explanation of changes.

2 | Test sensitivity to storage penetration, duration and demand shape

A four-hour battery can have a materially different marginal reliability contribution in a system already well supplied with four-hour storage than in one with a different load and supply shape. The IESO should not compare 4/8/12-hour values without showing the forecast portfolio and operational assumptions underlying the comparison.

Request. Publish a sensitivity grid covering storage penetration, demand growth, peak duration, seasonal resource adequacy, alternative charging constraints, energy efficiency, candidate-resource location and major transmission assumptions. Show the uncertainty range or directional sensitivity to each material variable.

3 | Distinguish planning metric from bid pricing and binding contracts

An internal planning estimate is not the same as a procurement scoring factor, accredited contract MW, energy market obligation or continuing payment adjustment. Blurring those categories would transfer non-hedgeable system-portfolio risk to individual project lenders after they commit capital.

Request. Before any LT2 procurement uses MRI, publish the resource-by-resource procurement application, factor vintage and effective date. State whether a post-award MRI update affects contract payments, contracted MW, performance security,

delivery obligations or only future solicitations. Prefer prospective changes and transparent transition rules.

4 | Protect consistency without double-counting

MRI is a system-level reliability measure, while location-specific connection feasibility is determined by network conditions. A strong evaluation framework must also consider site permitting, meaningful engagement with affected Indigenous communities and host municipalities, and credible construction readiness; these should not be misrepresented as elements of the MRI calculation itself.

Request. Publish a crosswalk explaining the independent role of MRI, locational deliverability, reliability service requirements, environmental and Indigenous consultation processes, and contract-performance tests. State how double-counting of network limitations and duplicate penalties will be avoided.

5 | Implications for the investor and community perspective

Investors and community partners evaluating project participation need visibility of long-term revenue sensitivity and material technology changes. Indigenous equity and community-benefit arrangements may be affected by the predictability of long-term contracted cash flows, but Indigenous participation should not be reduced to a simple financing variable.

Request. Publish plain-language summaries for community and smaller participants alongside the technical equations; include example impacts on four-hour versus eight-hour battery bid evaluation, but do not claim that an illustrative model result automatically resets any signed contract. Provide adequate stakeholder comment time when assumptions or methodology change.

6 | Governance, version control and feedback cycles

Use a repeatable annual change-management process, with dated methodology revisions, named data sources, documented quality checks and a response-to-feedback log. Separate substantive methodology changes from updated forecasts so market participants can identify the source of any change in accredited reliability value.

The October 27 PULSE findings on disciplined utility capital planning underscore a related but distinct point: robust generation procurement planning and utility grid investment planning need aligned forecast scenarios. MRI should not be extended beyond its intended reliability role to paper over network investment decisions.

Closing position

The IESO can strengthen market confidence and reliability by publishing rules that are independently testable, administratively feasible, and capable of being priced and delivered by accountable proponents. I would welcome continued technical engagement on these implementation details.

Faizan Farooqi
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Reference material reviewed

IESO, Capacity Accreditation October 22 presentation (slides 25-30) | Official source (click to open)

IESO, Capacity Accreditation engagement | Official source (click to open)

IESO, October 23 active consultation deadline bulletin | Official source (click to open)

Ontario, PULSE report, October 27, 2026 | Official source (click to open)