

Feedback Form

Capacity Accreditation for IESO Procurements – Date, September 17th 2026

Feedback Provided by:

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Date: October 1, 2026

To promote transparency, feedback submitted will be posted on the Capacity Accreditation for IESO Procurements 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 Procurements September 17 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 [Capacity Accreditation for IESO Procurements](#).

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 1st 2026.

General Comments/Feedback

CanREA strongly recommends that the IESO continue to use its existing accreditation framework for LT2 Window 2 and consider implementing any alternative accreditation framework, methodology and values for LT2 Window 3 onward, for the reasons outlined below.

- 1. The engagement and implementation timeline is too short.** By the IESO's own account, implementation and validation of the methodologies is still underway, and results will not be shared until a future session. With proposal submissions due in mid-2027, proponents cannot responsibly develop, site, finance, or price projects for Window 2 against accreditation values they have not seen. Many project proposals are already well advanced on the basis of the current framework. If potential new accreditation values arrive too late, bidders may withdraw, viable projects may fall away, or bids may carry risk premiums – all of which could put the IESO's targets and 2032 reliability needs at risk.
- 2. The sector needs time to properly study the options, methodologies and accreditation results.** The IESO's evaluation rates Marginal Reliability Impact (MRI) is low on transparency and acknowledges that it is difficult to reproduce, depends on modelling assumptions and the reference system, and may change as conditions evolve. Stakeholders need an adequate amount of time to review the results, understand what drives them, and provide informed feedback via adequate and transparent rounds of engagement between the IESO and the sector.
- 3. The sector requires clear implementation guidance before any new framework is introduced.** The industry adapts to new rules when it has advance notice and visibility. In response to the IESO's request during its Sept 17 engagement session, CanREA recommends that the IESO publish full methodology documentation and reference-system assumptions, release indicative values by resource type and duration, with sensitivity ranges, well before any draft RFP, publish a forward view of values across future windows and a defined update cycle with limits on year-to-year changes, and apply the methodology consistently to all resource types, including correlated outage and fuel-supply risk for thermal resources.
- 4. Procurement stability and investor confidence.** The IESO has emphasized the need to attract significant private capital to meet Ontario's reliability requirements. Frequent or late-stage changes to fundamental procurement assumptions undermine the confidence that developers, lenders, equity investors, and equipment suppliers require to make investment decisions. Accreditation methodology is not a minor technical parameter; it directly affects project economics, bid strategy, financing assumptions, and expected contract value. Maintaining the existing framework for LT2 Window 2 would reinforce confidence that procurement rules will remain stable throughout the development cycle while allowing sufficient time for an orderly transition to any new methodology.
- 5. Fairness to proponents already advancing projects.** Many proponents have already incurred substantial development expenditures and made siting, equipment, interconnection, and commercial decisions based on the existing accreditation framework. Introducing new accreditation values after projects have progressed could significantly disadvantage proponents that acted in good faith based on the information available at the time. Procurement rules should provide a level playing field and avoid creating retroactive impacts on projects developed under different assumptions.

- 6. Limited evidence that immediate implementation is necessary.** The IESO has identified valid reasons for evaluating alternative accreditation approaches; however, it has not demonstrated that an immediate change is required for LT2 Window 2 to achieve reliability objectives. Given the magnitude of the proposed change and the absence of published accreditation results, stakeholder review, and implementation experience, the burden should be on demonstrating why accelerated implementation is necessary rather than on proponents to absorb the resulting uncertainty. A short delay to Window 3 would not prevent the IESO from advancing the methodology while ensuring that its implementation is informed, transparent, and broadly understood.
- 7. Calibration and real-world validation are still required.** The transition to a more sophisticated accreditation methodology should be treated as an iterative process. Before accreditation values directly influence procurement outcomes, stakeholders should have an opportunity to compare results against historical resource performance, test key assumptions, and assess whether outcomes align with operational experience and reliability objectives. Publishing values and methodologies in advance of implementation would allow the IESO and stakeholders to identify unintended consequences before those outcomes affect procurement results.

CanREA would like to reiterate our recommendation that the IESO continue to use its existing accreditation framework for LT2 Window 2, and consider exploring and implementing any alternative accreditation framework, methodology and values only for LT2 Window 3 onward.

If the IESO decides to incorporate elements of a new accreditation framework into LT2 Window 2, CanREA recommends a phased transition approach that limits changes from current accreditation values during the current procurement cycle. This could include the use of transitional accreditation values, caps on year-over-year changes, or parallel publication of both UCAP and MRI based values to provide proponents with greater certainty while the methodology is validated and refined.