

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

Capital Power supports, in principle, the IESO's proposed use of a Marginal Reliability Impact (MRI) methodology for capacity accreditation in future procurements. An approach that more accurately evaluates reliability attributes under evolving system conditions represents an improvement over methodologies that rely primarily on historical availability as they are backward, lagging representations of reliability attributes. MRI may further provide a more appropriate basis for recognizing differences in the reliability contribution of resources with varying operating characteristics, including during periods of system need.

For the methodology to appropriately inform investment and procurement decisions, Capital Power encourages the IESO to maintain transparency by:

- Publishing the methodology, underlying assumptions, reference system, and resulting accreditation values by resource type sufficiently in advance of each procurement;
- Explaining how resources with different operating characteristics, including gas-fired generation and battery storage, will be compared and evaluated;
- Establishing a transparent and predictable process for updating accreditation values as system conditions and resource penetration change; and,
- Clarifying whether accreditation values will differ by location and, if so, how locational considerations will be incorporated and communicated through the applicable procurement documents.

Capital Power further submits that capacity accreditation should also be considered as one component of broader procurement design. While MRI may provide a more accurate assessment of the relative reliability contribution of different resources, accreditation alone may not ensure that a procurement secures the full range of resource attributes required to maintain reliability. Procurement structures should therefore remain aligned with the specific reliability need being addressed and provide sufficient certainty that resources capable of delivering the required attributes will be selected and developed. To that end, we encourage the IESO to consider how MRI can be applied alongside procurement streams that distinguish between resources with materially different operating characteristics.

Capital Power looks forward to reviewing the IESO's forthcoming results by resource type and providing further feedback as the proposed methodology and its application to future procurements are developed.