

Feedback Form

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

Feedback Provided by:

Name: Dena Van de Coevering

Title: Policy Advisor

Organization: Energy Storage Canada

Email: [REDACTED]

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

Energy Storage Canada (ESC) appreciates the opportunity to provide feedback on the IESO's Capacity Accreditation engagement process.

We support the IESO's efforts to modernize capacity accreditation in a manner that better reflects the reliability contributions of different resource types. As Ontario's electricity system evolves, accreditation methodologies should accurately recognize the characteristics of emerging technologies while supporting efficient procurement decisions and long-term reliability outcomes.

As this work progresses, ESC encourages the IESO to balance methodological improvements with the need for clear, predictable, and durable market signals. Energy storage projects require significant capital investment and long development timelines. A stable accreditation framework, combined with a consistent procurement cadence, will help maintain investor confidence, support a strong development pipeline, and sustain competition. Frequent or material changes to accreditation outcomes can increase uncertainty and project risk, potentially reducing market participation.

In evaluating accreditation approaches, it is important to consider how resources perform not only individually, but as part of a broader portfolio. The reliability contribution of a portfolio can differ significantly from the sum of individual resource accreditations, particularly where technologies complement one another across different hours and operating conditions. As Ontario's resource mix becomes more diverse, accreditation frameworks should account for these interactions and evaluate a range of portfolio scenarios to ensure outcomes appropriately reflect the benefits of resource diversity, flexibility, and complementary operating characteristics.

This is particularly relevant for hybrid and integrated resources. Storage paired with renewable generation can provide reliability benefits that exceed what may be apparent when each resource is assessed independently. Accreditation methodologies should explicitly consider these configurations to ensure efficient and cost-effective reliability solutions are appropriately recognized.

ESC also supports greater transparency regarding the system conditions and modelling assumptions that drive accreditation outcomes. Stakeholders would benefit from clear visibility into critical reliability periods, system risk drivers, and resource performance during those periods. More broadly, ESC remains concerned that the methodology emerging as the leading option through the engagement process appears to be among the least transparent approaches under consideration. While analytical rigour is important, transparency should be treated as a core design principle. Capacity accreditation serves as a market signal that influences procurement outcomes, investment decisions, and long-term resource development. If stakeholders cannot reasonably understand how values are determined, what assumptions drive outcomes, or why accreditation values change over time, confidence in the framework may be weakened.

If the IESO proceeds with a more complex accreditation approach, it should be accompanied by enhanced reporting and stakeholder visibility into key assumptions, modelling inputs, sensitivities, critical reliability periods, and resource performance. Stakeholders should be able to understand not only the resulting accreditation values, but also the factors driving those outcomes and how they may evolve over time.

It is also important that capacity accreditation not be viewed as the sole measure of system value. Energy storage provides benefits beyond capacity adequacy, including operational flexibility, rapid response capability, congestion management support, and integration of other resources. As electricity systems become increasingly complex, market frameworks should continue to evolve to recognize reliability and resiliency outcomes alongside energy services. Over time, future capacity, reliability, and ancillary service frameworks should

appropriately reflect capabilities such as Fast Frequency Response, voltage support, synthetic inertia, system strength, grid-forming operation, black-start functionality, and local reliability support. Storage is uniquely positioned to provide multiple reliability services simultaneously, helping maintain system stability and flexibility while remaining a cost-competitive resource. As these capabilities become increasingly important to system operations, market and procurement design should remain technology-neutral but outcome-focused, ensuring resources are recognized and compensated based on the reliability and operational benefits they deliver.

Storage has demonstrated that it is a cost-competitive reliability solution that can play an increasingly important role in supporting Ontario's reliability, flexibility, and affordability objectives. Recent procurements have demonstrated storage's strong competitiveness, and other jurisdictions are increasingly looking to Ontario's experience as they develop their own procurement frameworks. As the IESO continues to evolve its accreditation, procurement, and market frameworks, these changes should be implemented in a manner that complements, rather than disrupts, ongoing investment and development activity.

Overall, ESC supports an accreditation framework that recognizes portfolio and hybrid resource benefits, improves transparency, appropriately reflects the full reliability value of modern storage technologies, and maintains stable market signals. Preserving a predictable procurement cadence and a stable investment environment will help ensure cost-competitive resources such as energy storage can continue to contribute to Ontario's future reliability needs while delivering value to consumers.