

Feedback Form

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

Feedback Provided by:

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Date: September 28, 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

Alignment with Reliability-Based Accreditation and North American Best Practices

We support the IESO's efforts to develop and implement a capacity accreditation framework that better reflects the reliability contribution of individual resources. Moving toward an accreditation methodology that measures the marginal go-forward capacity value of each facility represents a significant improvement over approaches that rely primarily on installed capacity.

A marginal reliability-based framework will help ensure that capacity payments and procurement outcomes are more closely aligned with the resources that provide the greatest reliability benefit to the grid. This approach appropriately recognizes that the contribution of a resource to system adequacy depends not only on its installed capacity, but also on its expected performance during periods of system stress, which themselves are not static from a timing perspective.

The IESO's proposed direction is consistent with the evolution of resource adequacy frameworks across North America. For instance, the NYISO has adopted an Effective Load Carrying Capability (ELCC) framework for evaluating the capacity value of certain resources, reflecting a broader industry trend toward accreditation approaches that measure marginal reliability contributions rather than relying on nameplate capability. Ontario's adoption of a similar framework will help align the province with established best practices while improving the efficiency, transparency, and credibility of capacity procurement outcomes.

Integration with Planning and Reliability Processes

As the accreditation framework is implemented, it will be important for the IESO to ensure that resource adequacy planning, reliability assessments, and procurement processes are aligned with the new methodology.

Changes in accredited capacity values may have implications for planning requirements and procurement targets. If the amount of accredited capacity available from the existing resource fleet differs materially from current assumptions, planning and procurement requirements should be adjusted accordingly to maintain reliability objectives.

Accreditation should therefore not be treated as a standalone procurement mechanism. Rather, it should be integrated consistently throughout the IESO's planning and reliability assessment processes to ensure that procurement decisions accurately reflect the accredited reliability contribution of the resource mix.

Transparency of Accreditation Studies and Methodology

Given the importance of accreditation outcomes for investment decisions, the assumptions and methodologies used to determine accreditation values should be transparent and subject to stakeholder review.

The studies used to calculate marginal reliability values are inherently dependent on assumptions regarding load forecasts, weather conditions, resource performance characteristics, outage assumptions, system conditions, and future resource mixes. Stakeholders should have an opportunity to review and provide input on these assumptions through the established stakeholder engagement process.

Other North American jurisdictions have adopted transparent processes through which accreditation methodologies, modelling assumptions, and study inputs are periodically reviewed with stakeholders. Ontario should follow a similar approach to help ensure that accreditation values remain robust, credible, and broadly supported by market participants.

Transparency is particularly important because accreditation values will directly influence investment decisions, facility expansion opportunities, procurement participation, and the economics of both new and existing resources.

Regulatory Certainty and Timely Publication of Accreditation Values

Accreditation values should be finalized and published well in advance of procurement bid submission deadlines.

Developers require certainty regarding accredited capacity ratings in order to evaluate project economics, structure competitive bids, secure financing, and advance development activities.

The IESO should establish a predictable schedule for accreditation studies and updates that provide participants with sufficient advance notice before procurement activities commence. **Studies should be prospective, looking beyond the current system to potential future system conditions. This would help inform proponents about the evolution of capacity accreditation values and guide long-dated development activities.** Doing so would support more competitive procurement outcomes and enable market participants to make informed investment decisions.

Conclusion

We support the IESO's efforts to implement a capacity accreditation framework that better reflects the marginal reliability contribution of individual resources. A transparent, predictable, and planning-integrated accreditation regime will improve investment signals, align Ontario with North American best practices, and help ensure that the province procures the capacity necessary to maintain reliability at the lowest reasonable cost to consumers.

Successful implementation will depend not only on the accreditation methodology itself, but also on transparent stakeholder engagement, alignment with broader planning and reliability processes, and timely publication of accreditation values to support efficient market participation and investment.