

# Feedback Form

## Capacity Accreditation for IESO Procurements – Date, September 17<sup>th</sup> 2026

### Feedback Provided by:

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Date: September 30, 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](mailto:engagement@ieso.ca) by October 1st 2026.**

## General Comments/Feedback

Rodan supports the IESO's objective of modernizing capacity accreditation to better reflect the reliability contributions of Ontario's increasingly diverse resource mix. However, Rodan does not support adopting Marginal Reliability Impact (MRI) in its current proposed form.

The IESO's own evaluation rates MRI "Low" for transparency and only "Medium" for predictability and its ability to capture performance during periods of need. Capacity accreditation is a market signal that shapes procurement outcomes, contributor enrolment, and investment decisions. Transparency and predictability should therefore be core design principles, not trade-offs for modelling efficiency. Rodan is concerned that the leading option in this engagement is also among the least transparent methods under consideration.

## Methodology Dependence and Predictability

The IESO's illustrative examples demonstrate how sensitive accreditation outcomes are to the selected methodology. This variation creates the type of uncertainty that discourages participation.

For an aggregator, this uncertainty passes directly to contributors. Rodan must be able to explain to commercial, industrial, and institutional customers what their flexibility is worth before they commit to a program. If accreditation depends on a reference system that participants cannot reproduce and that may change with each update, securing that commitment becomes more difficult.

The likely result is greater contributor attrition, a smaller demand-side pipeline, and reduced competition in future auctions and procurements.

## Portfolio Diversity and Aggregated Resources

MRI evaluates the marginal impact of a small increment of a particular resource type. This approach does not adequately capture how aggregated portfolios deliver reliability in practice.

Rodan's portfolio combines load curtailment across a broad range of sectors and end uses with other behind-the-meter technologies. Contributors perform across different hours, seasons, and operating conditions, allowing them to complement one another. This diversity firms up delivery and can make the reliability value of the aggregated resource greater than the sum of its individual parts, an effect that a class-level marginal calculation may not capture.

An aggregated demand-side resource is a hybrid resource. Rodan asks the IESO to model aggregated and hybrid configurations and evaluate a range of portfolio scenarios. This would ensure that diversity and complementary operating characteristics are recognized rather than averaged away.

## Interaction with Existing Performance Mechanisms

The IESO states that accreditation is separate from performance management. For demand-side resources, however, capacity is already reduced through capacity testing, performance-based adjustments, and non-performance charges.

Applying a system-level MRI discount in addition to these resource-specific measures could penalize the same risk twice and leave demand response subject to greater cumulative reductions than supply-side resources.

Rodan asks the IESO to explain how MRI would interact with existing performance adjustments and demonstrate that the methodology would not double-count performance risk.

## Transparency, Reporting, and Process

If the IESO proceeds with a more complex approach, it should provide enhanced reporting that enables participants to understand both the resulting accreditation values and the factors that drive them. The reporting should also help participants assess how those values may change over time.

Before applying any new methodology, the IESO should also establish a clear update cycle and define limits on year-over-year changes.