

# Feedback Form

## Clean Energy Credits – February 24, 2022

### Feedback Provided by:

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Following the February 24, 2022 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by March 17, 2022.** If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

## Opportunities & Challenges

Topic	Feedback
<ul style="list-style-type: none"><li>• What are the key opportunities and challenges the IESO should be aware of in developing a voluntary clean energy market?</li></ul>	<p>Key opportunities include:</p> <ul style="list-style-type: none"><li>• Creating a market for clean energy attributes that will support clean fuels (e.g., electrolysis produced hydrogen) capacity in Ontario</li><li>• Generate value and new revenue stream for electricity ratepayers from clean regulated energy assets</li><li>• Enabling of clean energy and fuel projects and pathways; attracting ESG focused economic development in Ontario</li><li>• Creating a centralized platform for tracking, transparency, and attribute allocation that highlights the clean Ontario electricity generation, provides opportunity for accurate carbon accounting and further, provides clarity regarding the remaining grid mix carbon intensity</li></ul> <p>Key challenges include:</p> <ul style="list-style-type: none"><li>• Ensuring transparency and education in the form, function, and intent of the voluntary clean energy market</li><li>• Ensuring integration with federal clean energy and fuel initiatives</li><li>• Standardization across all registries for the creation, trading and retirement of credits</li></ul>

## Design considerations

Topic	Feedback
<ul style="list-style-type: none"> <li>Which design considerations outlined in this presentation are most important to you and why?</li> </ul>	<p>Design considerations:</p> <ul style="list-style-type: none"> <li>Flexibility for the buyer to transact and choose the desired mix of Clean Energy Credits and Clean Fuel Credits</li> <li>Transparency of credit details, including information on their creation, retirement, and purchaser / seller info</li> <li>Clear differentiation of credit attributes to empower market participants to achieve their desired goals</li> <li>Maintaining the security of financial transactions by keeping details outside of the credit tracking system; the registry should be for the credit tracking only, and keep the financial transaction outside of this tool</li> </ul>

Topic	Feedback
<ul style="list-style-type: none"> <li>What other design considerations should IESO be aware of?</li> </ul>	<ul style="list-style-type: none"> <li>Ability to grow, adapt to, and be inclusive of new and innovative credits product categories</li> <li>Having functionality to include new products, stimulating innovation in the electricity and clean fuels sectors, and enabling clean technology development</li> <li>Creating a market for clean energy attributes that will support clean fuels (e.g., electrolysis produced hydrogen) capacity in Ontario – ensuring a clear understanding of how this tool can be utilized to produce clean fuels such as electrolysis produced hydrogen</li> <li>Alignment, exchangeability and interchangeability with other registries and tracking platforms</li> <li>Time stamping hourly to ensure credit creation and attributes can align with market participant use case; allowing the customer to choose credits tailored to their needs</li> </ul>

## Engagement Process

Topic	Feedback
<ul style="list-style-type: none"> <li>Which stakeholder groups and/or design topics are most important to include in the planned focus group discussions?</li> </ul>	<p>Topics:</p> <ul style="list-style-type: none"> <li>Creation of a tool that supports a market for clean energy attributes that can support the production of clean fuels production in Ontario</li> <li>Additional products incorporated within the tool to be created, tracked and retired, including all appropriate data of additional products (e.g. Electrolysis produced hydrogen product that is directly related to the clean electricity from Ontario)</li> </ul> <p>Stakeholders:</p> <ul style="list-style-type: none"> <li>Ontario clean fuel producers (including Atura Power)</li> <li>Ontario clean energy generators (including OPG and others)</li> <li>Indigenous communities</li> <li>Other North American and European voluntary registry platform providers</li> </ul>

Topic	Feedback
<ul style="list-style-type: none"> <li>Are there any additional engagement opportunities the IESO should consider?</li> </ul>	<ul style="list-style-type: none"> <li>Alignment with other voluntary credit markets in Canadian provinces – aim to align with the creation of registries across Canadian provinces, as well as the greater North America and Europe – would not want this to hold up the progress of this tool, but with intent to share ideas and learnings with other jurisdictions creating a well-informed tool</li> <li>Incorporate a broader view on carbon accounting, credit creation of all types, and the interaction of clean energy and clean fuels, and other carbon offsetting, credit creating opportunities.</li> </ul>

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<ul style="list-style-type: none"> <li>• Would you be willing to participate in a technical session? If so, on which topic(s)?</li> </ul>	<ul style="list-style-type: none"> <li>• Yes, Atura Power is developing green and low carbon hydrogen projects leveraging Ontario's low carbon electricity grid and would appreciate the opportunity to participate in a technical session to further align the significance of the CEC registry and voluntary credit market on the potential benefits for green and low carbon hydrogen production in Ontario.</li> </ul>

## General Comments/Feedback

Atura Power would like to thank the IESO for engaging with stakeholders on the important subject of a clean energy credits registry for Ontario. It is the opinion of Atura Power that there are opportunities for ensure the creation of a tool that supports corporate and business ESG goals and supports the use of these credits in the creation of low carbon fuel such as electrolysis produced hydrogen. It is important that in the creation of the clean energy credit registry tool the IESO does not limit what type of load that can access and use the registry. With this, stakeholders of all kinds should be able to participate in the voluntary registry more fully, have more options available for reaching their specific goals (e.g. ESG or product based), and ultimately pass benefits along to Ontario ratepayers.