

Feedback Form

Clean Energy Credits – April 21, 2022

Feedback Provided by:

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Registry Design Features

Topic	Feedback
Are there any registry features missing from the proposed list, either basic requirements or future functionality?	N/A

CEC Product Offering Options

Topic	Feedback
Has IESO identified the right set of CEC product offerings? Are there any missing?	N/A

Topic	Feedback
Are there benefits/challenges to any of the proposed CEC product offerings that have not been covered?	An additional benefit to the Free Unbundled CEC Distribution is that it guarantees that EAs from electricity generated in Ontario will stay in Ontario. Since the market is intended to be voluntary, some generators may be enticed to sell credits in other jurisdictions with higher credit prices.

Topic	Feedback
Which CEC option(s) works best for your company? For Ontario?	The City of Ottawa supports the option for Free Unbundled CEC Distribution, in which the IESO would retire EAs from existing generation and assets on behalf of customers. This option could be combined in a hybrid model with another product offering to provide a monetary benefit for new renewable energy generation in the Ontario.

CEC Customer Preferences Survey

Topic	Feedback
What are the most relevant findings from the CEC customer survey?	N/A

General Comments/Feedback

We would like to reiterate our concern that ratepayers have been paying to decarbonize the grid and the EAs from existing generation should be retired on their behalf. If CECs are able to be purchased for electricity generated historically, this would affect scope 2 emissions accounting for the Province and organizations, including the City of Ottawa.

On top of this, the City has recently learned that OPG has been selling EAs of their generation to buyers outside of Ontario for some time. We encourage the IESO to investigate whether this practice has led to double counting, as this has the potential to affect the legitimacy of Ontario's claims about the GHG intensity of the bulk transmission grid, and in turn scope 2 emissions accounting for Ontario-based organizations.

Ottawa recommends that new/re-contracted assets only be permitted to sell CECs until 2035. This will improve the business case for renewable generation in the short-term. However, by 2035, it is expected that the electricity grid will have net-zero emissions, in line with the Federal Government's Clean Electricity Standard.

We'd also like to make you aware that only the first 45 minutes of the April 21st engagement is available on Youtube.