

Feedback Form

Clean Energy Credits – April 21, 2022

Feedback Provided by:

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Following the April 21, 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 by **May 5, 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.

Registry Design Features

Topic	Feedback
Are there any registry features missing from the proposed list, either basic requirements or future functionality?	<p>We generally agree with the design features outlined by the IESO. Detailed product segmentation (e.g., vintage, technology type etc...), attribute traceability, ease of access, and compatibility with other markets and registries are notably important features. However, we strongly recommend that the IESO only act as a standard setting body to certify existing registries that already provide these services such as M-RETS, and leave suppliers, brokers, and buyers the choice of their preferred registries. Many suppliers, brokers, and buyers located in Ontario are already invested in and employ such registries, and therefore would benefit by avoiding the costs of having to familiarize and implement a new registry; not to mention the benefit arising from the avoided costs for the IESO or another crown-corporation to develop such registries anew. These existing registries already cover multiple jurisdictions and continue to expand and evolve their services—this would satisfy the “future-proofing” and “compatibility with other jurisdictions” requirements set out in the Ministry letter. The immediate harmonization and tracking of Ontario’s “clean attributes” with other markets through existing registries would allow suppliers to seek out both external and internal opportunities right away. In this scenario, the IESO can simply govern the standard setting, certification, and reporting functions without having to devote significant regulatory resources, and would potentially act as a first-mover amongst Canadian jurisdictions.</p>

CEC Product Offering Options

Topic	Feedback
Has IESO identified the right set of CEC product offerings? Are there any missing?	An impetus behind enabling environmental attributes is to allow load customers to voluntarily “fund” and pay for emissions-free electricity with certain characteristics (e.g., vintage, technology type...). In some jurisdictions, a load customer can voluntarily and directly fund the development of a renewable energy project to meet their environmental, social, and governance targets through clean energy credits. The IESO can consider creating “storage credits,” similar in concept to “clean energy credits,” to put a tangible value on the peak shifting value of storage devices. We note that the Clean Energy Credit Stakeholder Survey indicated that up to 50% of the respondents are interested in using “energy from storage technologies.” The IESO can enable the buildout of these storage devices by creating voluntary “storage” credits (different than clean energy credits to prevent double counting) that would allow a load customer to fund the development of a storage project themselves, to the ultimate benefit of the grid and ratepayers.

Topic	Feedback
Are there benefits/challenges to any of the proposed CEC product offerings that have not been covered?	Click or tap here to enter text.

Topic	Feedback
Which CEC option(s) works best for your company? For Ontario?	Click or tap here to enter text.

CEC Customer Preferences Survey

Topic	Feedback
What are the most relevant findings from the CEC customer survey?	We appreciate the IESO making the survey results public. We wish to highlight the high “amount willing to spend” that respondents answer regarding unbundled credit purchases (\$70). Please take this information into account as the IESO designs its various procurement processes (e.g., LT-RFP, expedited RFP...): clean energy credits clearly have market value for load customers, and the IESO’s contracts (bundled or otherwise) should clearly reflect this fact.

General Comments/Feedback

Click or tap here to enter text.