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Comments from Mississaugas of Scugog Island First Nation (MSIFN)

IESO Eastern Ontario Bulk Planning Engagement

October 31, 2025

Submitted to:
Independent Electricity System Operator (IESO) Engagement Team

Via email: engagement@ieso.ca

Re: Response to IESO Eastern Ontario Bulk Planning Engagement (ongoing, per <https://ieso.ca/Sector-Participants/Engagement-Initiatives/Engagements/Eastern-Ontario-Bulk-Planning>)

Dear IESO Engagement Team,

The Mississaugas of Scugog Island First Nation (MSIFN), as part of the Michi Saagiig Anishinaabeg and signatories to the Williams Treaties, appreciates the opportunity to provide focused comments on the Eastern Ontario Bulk Planning engagement. The planning area encompasses the traditional territories of the Michi Saagiig Anishinaabeg, covered by the Williams Treaties.

MSIFN has a vested interest in this initiative due to its potential impacts on our treaty rights, unceded territories, cultural heritage, and economic reconciliation opportunities. Our comments are informed by our inherent responsibilities as stewards of these lands and waters, and draw on principles from the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the Truth and Reconciliation Commission's Calls to Action, and Section 35 of the Constitution Act, 1982.

Below, we provide targeted feedback on key elements of the Eastern Ontario Bulk Plan, with emphasis on transmission reinforcements, potential in-water or near-shore infrastructure, equity participation, and reconciliation imperatives.

1. Concerns Regarding Transmission Reinforcements in Eastern Ontario

The Eastern Ontario Bulk Plan identifies needs to enhance supply to Belleville, Kingston, and Ottawa areas over the next 20 years, including potential upgrades to the Flow Into Ottawa interface, new interconnections with Quebec or New York, and reinforcements in the Belleville area. Any infrastructure proposed near or across Lake Ontario implicates MSIFN territories.

Impacts on Unceded Lands Under Lake Ontario

Any underwater, near-shore, or shoreline-adjacent transmission routing (e.g., intertie crossings, submarine cables, or shoreline landing stations) traverses the bed of Lake Ontario, south of the Michi Saagiig Gunshot Treaty (Johnson-Butler Purchase, 1787–1788). Historical records and Michi Saagiig oral histories confirm that the treaty ceded only shoreline-adjacent lands to the distance a gunshot could be heard, leaving the lakebed and submerged territories unceded. The Michi Saagiig Nations have asserted title over these waters.

This triggers the Duty to Consult and Accommodate (DTCA) and requires consent for any disruption to the lakebed. Construction activities (e.g., cable laying, anchoring, trenching, shoreline works) could disturb:

- Sensitive aquatic ecosystems
- Submerged archaeological resources
- Traditional harvesting areas (fish, medicines, cultural sites) protected under Section 35

Consultation Requirements

- Full consultation on route alternatives
- First Nation-led impact assessment protocols
- Mitigation measures to avoid infringement

Additional Concerns

- Lakebed Ecosystem and Species of Interest: The recent discovery of endangered Lake Sturgeon in the Lake Ontario corridor raises serious concerns for any in-water works in Eastern Ontario.
- Cumulative Impacts: A comprehensive cumulative impact assessment is needed across:
 - Eastern Ontario intertie upgrades (if in-water)
 - Pickering decommissioning
 - Darlington expansions (SMRs, intake/outfall)
 - York-Durham Sewage System deepwater infrastructure
- Generational Knowledge Gaps: Ongoing and proposed projects continue to restrict access to traditional waters and land based harvesting areas, disrupting cultural knowledge transmission to future generations.
- Federal Jurisdiction: Potential effects on fish habitat, migratory birds, and Indigenous rights trigger the Impact Assessment Act (IAA). We recommend a designation request under s.9(1) to the Minister of Environment and Climate Change for all projects that may create effects on areas of federal jurisdiction.

2. Advocacy for Indigenous Equity Participation: Extending Hydro One's 50-50 Model

MSIFN strongly supports authentic Indigenous economic partnerships in the Eastern Ontario Bulk Plan, aligned with Ontario's reconciliation goals.

Application of Hydro One's Equity Model

Hydro One's industry-leading model offers First Nations 50% equity in new large-scale transmission lines (> \$100M), as proven in Waasigan (\$1.2B), St. Clair, and Chatham–Lakeshore. We recommend:

- Adapting this model to any new transmission, **transmission refurbishments, intertie reinforcements, new transmission stations or transmission sub-stations** in Eastern Ontario
- Exploring majority First Nation ownership with MSIFN and other Michi Saagiig Nations as priority partners
- Leveraging federal funding programs to enhance ratepayer benefits

Extension to Other Project Elements

Equity and revenue-sharing opportunities should extend to:

- Substation upgrades (e.g., Belleville TS)
- Distributed Energy Resources (DERs) and battery storage procurements in the region
- Energy efficiency programs targeting First Nation-owned enterprises

This aligns with the Ministry's Integrated Energy Plan and advances economic reconciliation.

3. General Recommendations for Engagement and Implementation

Enhanced Consultation Processes - The Eastern Ontario Bulk Planning webpage references Indigenous participation but lacks detail. MSIFN requests:

- A government-to-government consultation framework
- Integration of Michi Saagiig knowledge keepers in route selection, impact assessments, and monitoring
- Early involvement in Q4 2025 updates and Q1 2026 final report

Next Steps

- Schedule a bilateral meeting with IESO to discuss these comments
- Ensure MSIFN input into Hydro One's Regional Infrastructure Plan for Eastern Ontario

Alignment with Low-Carbon Priorities

MSIFN is investing in battery storage, renewable natural gas (RNG), and renewable infrastructure. The Eastern Ontario Bulk Plan should:

- Prioritize decarbonization pathways
- Maximize use of RNG from ratepayer organic waste as natural gas is integrated into planning

MSIFN is committed to collaborative, rights-respecting solutions that support reliable, clean energy while fostering prosperity. We look forward to your response and continued dialogue.

Miigwech,
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