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Comments from Mississaugas of Scugog Island First Nation (MSIFN)

IESO Eastern Ontario Bulk Planning Engagement

January 23, 2026

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 feedback on the items discussed during the December 12, 2025 engagement session. We focus on impacts to land, potential equity opportunities, and recommendations for engagement.

1. Concerns Regarding Transmission Reinforcements in Eastern Ontario

The December 12th, 2025 engagement session emphasized the focus on adequacy of electricity supply to Ottawa and Belleville over the next 20 years. The IESO has discussed assessing opportunities for expanding interties with Quebec/New York and exploring opportunities to improve transmission capability to deliver new resources, such as the Wesleyville/Port Hope New Nuclear Project. This could include increasing eastbound transmission capability from the

Bowmanville/Lennox area to supply eastern Ontario. New electricity generation would be enabled by these transmission reinforcements. Any activities within these regions will impact the Crawford Purchase and Treaty 27 lands.

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 the development of Draft Recommendations for the Eastern Ontario Bulk Plan.

Questions:

1. Supply to Belleville Study – Please describe whether a new or existing right-of-way would be required for each of the possible transmission reinforcement paths to Belleville (Napanea to Belleville, Hinchinbrooke to Belleville, and Clarington to Belleville).
2. Supply to Ottawa Study – Please describe whether a new or existing right-of-way would be required for each of the possible transmission reinforcement paths to Ottawa (Bowmanville to Ottawa, Lennox to Ottawa, and St. Lawrence to Ottawa).

Next Steps

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

In general, it is very difficult for MSIFN to provide specific comments on the proposed/conceptual transmission reinforcement options for the Eastern Ontario Bulk Plan without better understanding the potential footprint on lands and waters of each option. 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.

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MSIFN Consultation Team

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