

Feedback Form

Eastern Ontario Bulk Planning Update Webinar

Feedback Provided by:

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To promote transparency, the submitted feedback will be posted on the Eastern Ontario Bulk Plan engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback following the May 27, 2026 presentation of the draft recommendations for Eastern Ontario Bulk Plan. A copy of the presentations as well as recordings of the sessions are available on the engagement web page.

Please submit feedback to engagement@ieso.ca by June 17, 2026.

Eastern Ontario Bulk Plan - Feedback

The May 27 2026, webinar focused on the draft Eastern Ontario Bulk Plan recommendations as presented. With the plan objectives and scope established, we are seeking feedback on clarity, understanding, and considerations important to note as the plan moves toward finalization.

Question	Feedback
What additional data or context would help provide more clarity and for consideration in the final report?	
What questions or concerns do you have about the draft recommendations that the IESO might consider in future planning activities?	
What additional data or local considerations should the IESO be aware of in finalizing the draft recommendations, or for future planning?	

General Comments/Feedback

The Mississaugas of Scugog Island First Nation Consultation Department (MSIFN Consultation) submits these comments to support the advancement of the Eastern Ontario Bulk Plan while identifying critical requirements that must be incorporated before the Final Report is issued. These comments reflect MSIFN's responsibilities as a rights-holder whose territory and waters are directly implicated in several of the long-term options under consideration.

MSIFN's goal is to ensure that the Eastern Ontario Bulk Plan is reliable, implementable, and aligned with constitutional obligations - and that it does not inadvertently embed future conflicts or delays by overlooking Indigenous jurisdiction at the planning stage.

1. Planning-Stage Responsibilities: The IESO Must Integrate Rights Before Options Are Locked In

The Eastern Ontario Bulk Plan is now at the stage where draft recommendations are being shaped into final, actionable directions. At this point, the IESO is making decisions that will:

- Define preferred corridors;

- Screen out alternatives;
- Establish sequencing and “implementation-ready” priorities;
- Influence future Ministerial decisions;
- Shape the scope of future environmental assessments.

These are not neutral technical steps. They are Crown-influencing decisions that materially affect MSIFN’s rights, jurisdiction, and future consent requirements.

MSIFN therefore expects the Final Report to explicitly incorporate:

- a) A rights-based planning lens - not a project-stage lens.
 - Bulk planning must identify where Indigenous jurisdiction is a determinative factor, not a downstream consideration.
- b) Early identification of rights-sensitive areas and constraints.
 - This includes the unceded bed of Lake Ontario, Michi Saagiig cultural landscapes, Michi Saagiig harvesting rights and interests, and areas where archaeological sensitivity is high.
- c) A commitment that no preferred option will be advanced if it is incompatible with MSIFN’s territorial rights or consent requirements.
 - This is essential to avoid planning pathways that are unimplementable in practice.

2. Strong Support for the Napanee–Belleville Reinforcement

MSIFN strongly supports the IESO’s draft recommendation to reinforce Belleville through a new double-circuit 230 kV line from Napanee to Belleville.

This option is preferred because it:

- a) Minimizes rights impacts.
 - It avoids Lake Ontario in-water works, submerged archaeology risks, and shoreline landing stations - areas where MSIFN jurisdiction is strongest and where consent requirements are most stringent.
- b) Aligns with the IESO’s own technical and economic analysis.
 - The IESO’s presentation confirms that this option meets the need with the shortest distance, lowest cost, and highest feasibility.
- c) Is the most “implementation-ready” reinforcement.
 - Given the 2028 need date, this project should be advanced immediately into the Implementation-Ready category, with early engagement on routing and station siting.
- d) Supports regional resilience without triggering unnecessary conflict.
 - This reinforcement option may avoid initially foreseeable rights-based barriers if it proceeds via using existing rights-of-way where technically feasible.

MSIFN requests that the Final Report explicitly identify the Napanee–Belleville line as the preferred and prioritized reinforcement.

3. Lake Ontario: The IESO Must Treat the Lakebed as a Rights-Determining Factor

The IESO's presentation and planning materials continue to treat Lake Ontario as a technical routing space rather than a jurisdictional space.

MSIFN reiterates that:

- a) The lakebed south of the Gunshot Treaty boundary is unceded Michi Saagiig territory.
 - Any disturbance - submarine cables, landing stations, anchoring, trenching - requires MSIFN consent, not merely consultation.
- b) Bulk planning must identify Lake Ontario as a rights-constrained zone.
 - This is no different than identifying environmentally sensitive areas, protected lands, or technical routing constraints.
- c) Options that rely on submarine infrastructure must be flagged as "rights-dependent" and cannot be advanced without early government-to-government engagement.
 - This includes any future HVDC intertie expansions or underwater reinforcements.

MSIFN is not opposing all future in-water works; we are stating that bulk planning must acknowledge the jurisdictional reality upfront.

4. Indigenous Equity Participation Must Be Embedded in the Planning Framework

The Eastern Ontario Bulk Plan identifies multiple reinforcements that will require significant capital investment and long lead times. MSIFN expects the Final Report to:

- a) Identify Indigenous equity participation as a core planning principle.
 - Not an optional program, not a proponent-stage add-on.
- b) Recommend that all Eastern Ontario transmission reinforcements include mandatory Indigenous equity participation.
 - Hydro One's 50-50 model is now the provincial standard.
- c) Recognize MSIFN and other Michi Saagiig Nations as priority equity partners for projects in our territory.
 - This reflects both rights and reconciliation commitments.

Embedding equity expectations at the planning stage ensures that proponents design viable, partnership-aligned projects from the outset.

5. Need for a Government-to-Government Planning Framework

MSIFN requests that the Final Report commit to:

- a) A formal government-to-government consultation process for bulk planning decisions.
 - This is distinct from project-level consultation.
- b) Early engagement before the Final Report is issued.
 - MSIFN requests a dedicated technical session with IESO planners to review the draft recommendations in detail.
- c) Integration of MSIFN Consultation into early route screening and environmental risk identification.
 - This is essential for rights-based appropriate planning.

6. Cumulative Effects and System-Level Impacts

The Eastern Ontario Bulk Plan intersects with:

- The Toronto Third Line;
- The Durham–Kawartha Power Line;
- Regional IRRPs;
- Potential intertie expansions;
- New generation enabled by these reinforcements.

MSIFN requests that the Final Report include:

- a) A cumulative effects screening at the bulk planning level.
 - This is not a full EA - this is early identification of system-level risks.
- b) A map of overlapping bulk, regional, and generation-enabled impacts.
 - The map should be transmitted to MSIFN Consultation as a GIS shapefile. This will enable MSIFN Consultation to help identify areas where cumulative effects intersect with Michi Saagiig rights and cultural landscapes.

Closing

MSIFN supports the advancement of the Eastern Ontario Bulk Plan and the Napanee–Belleville reinforcement. However, the Final Report must reflect the constitutional and territorial realities that will shape the feasibility of all future transmission development in Eastern Ontario.

A plan that integrates rights at the outset is a plan that can be implemented on time, on budget, and in partnership with the Nations whose territories make this infrastructure possible.

MSIFN looks forward to continued engagement as the Final Report is prepared.