

Feedback Form

Long-Term RFP Community Engagement Indigenous Discussion Session – July 14, 2022

Feedback Provided by:

Name: Susan Sullivan

Title: Community Energy Champion

Organization: Caldwell First Nation

Email: [REDACTED]

Date: Friday, August 5th, 2022

To promote transparency, feedback submitted will be posted on the [engagement webpage](#) unless otherwise requested by the sender.

Following the Long-Term RFP Community Engagement Indigenous Breakout Discussion webinar held on April 12 and 19, 2022, the Independent Electricity System Operator (IESO) is seeking feedback as outlined during the presentation. A copy of the presentation as well as a recording of the session that includes an overview of the feedback request, can be accessed from the [engagement webpage](#).

Please submit feedback to engagement@ieso.ca by August 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.

Indigenous Community Feedback Form

Topic	Feedback
What are your thoughts on the proposed Indigenous project participation concepts? Are there any additional considerations?	When I updated our Chief and Council on the proposed amendments for the RFP process, the biggest take away that I received was that this process needs to be more Indigenized, and that there is still much work to be done to de-colonize the system. We recognize and appreciate the hard work being done by the IESO engagement team, however, we also feel that a lot more work and focus needs to be paid to proponents and making them aware of their roles and responsibilities towards FN communities. They need to better understand that this is not a mere kindness, not some generous act of inclusion for FN communities on their part, but is their very real legal obligation under the federal mandate laid out in the TRCC Calls to Action.

Topic	Feedback
<p>What additional information do communities require to effectively participate in the LT1 RFP?</p>	<p>Due to current capacity limitations for CFN, particularly in our Consultation department, it can be very difficult for us to keep on top of which proponents are seeking projects, where, and when. As CEC, I am finding myself regularly pulled into a consultation support role for our participation in all aspects of the regulatory process. In addition to this challenge, we find that many proponents are unaware of how to approach engagement with CFN, and will sometimes send correspondence to the wrong people, only to have that correspondence go unseen and unaddressed. When this happens, CFN is treated as a box to be checked off the proponent's Indigenous consultation list, because they sent a letter out somewhere, even though no real engagement has actually happened.</p> <p>We have had it happen several times in the last few weeks, where we have just learned of a project, and learned it is already underway, only to look into things and find ourselves listed in the Indigenous Engagement Record as having been consulted because they sent out letters and emails to the wrong point people, and in some cases, even to staff who don't work here anymore. This is wrong, and this should not be considered as engagement by the ISEO. Proponents should not be allowed to pass a chart full of letters/emails sent, but never responded to, forward to the IESO as a complete engagement record in this process. FN communities do want to be consulted on these matters. If responses are not being received, it is very likely that the correspondence is not reaching the right people, and very little effort is being made on the part of the proponents to find out who the right people are.</p> <p>It would be extremely helpful if there was some sort of system or database developed where a list of all proposed projects at all stages of the regulatory process could be searched by region, so we can each keep watch over our traditional territory and the regions that have special interest to our communities more effectively, and so that we can be sure to engage with these proponents, as we do not want to miss out on the opportunity to collaborate and have proper influence on how these projects are undertaken. Even a colour coded scatter dot map for projects, all the way from new proposals to fully approved, green lit undertakings – similar to the one we use to monitor and track the progress of Community Energy Plans for all FN communities – would work well for this sort of oversight, and would be simple for us to navigate as needed. This would be so helpful to us.</p>

Should Indigenous communities that are located near projects be provided with certain levels of Indigenous participation incentives versus communities that are not located near projects?

If so, how should the Indigenous participation mechanisms distinguish between local and non-local communities?

CFN respects the sovereignty and autonomy of all First Nations to make their own decisions as to the priorities and activities of their respective communities. We would never seek to dictate which projects should be of importance to other Nations.

In terms of CFN, with such a small, scattered population developing a brand-new community, mixed with the heavy onslaught of new proponents and projects popping up in and impacting our traditional territory (75% of the identified transmission zone for maximum rated criteria points occur on CFN territory – Windsor, Leamington, and Kingsville), we find ourselves in a unique position, and would benefit very greatly from some sort of special geographical consideration for these projects. In doing so, we would not want to see other communities barred from participation in projects that are of interest to their communities, but rather, would like to see added special incentives based on geographical location *in addition* to any other incentives that would be available to any interested FN.

It is hard to say how this should look. Perhaps extra incentive points could be introduced for geographical considerations, in addition to the proposed Indigenous participation points based on the percentage of economic interest being shared with Indigenous communities? Although this doesn't necessarily prevent the proponents from doing the same box-checking activities we have described.

We would also like to make sure that we are included from the very start of the project planning process, rather than being brought on part way through. Perhaps there could be incentive points awarded for proponents with active plans to host First Nations Field Liaisons (FLRs) in the very beginning phases, such as the archaeological and environmental assessments. This way, not only would that incentive to include us from the start be emphasized, but this could also help us avoid situations where projects are

fully underway, and we don't even know about it. Perhaps instead of a points system for a component like that, it could be made a mandatory requirement to have FN FLR participation on all projects, or at they very least, for the proponent to demonstrate that they went above and beyond to invite FN FLR's to be part of the project and that they tried very hard for this aspect of inclusion to be met. While I don't know the specific solution, it feels like there are lots of angles and opportunities for improvement that could be considered, here.

One of the things we want to avoid is the adoption of pan-Indigenous approaches to engagement with FNs. While I understand how that can complicate the process for proponents, it is important for everyone to understand that First Nations cannot be painted with the same brush, and that each Nation deserves to be engaged in a manner that allows them to define and shape their own inclusion and participation as a sovereign government and sovereign entity. With this in mind, the best way to amend this process is from the proponent side, with more consideration as to how the proponent's required Indigenous consultation efforts can be better developed, defined and utilized for real and meaningful engagement. When I engage with my community as part of government funded activities, I need to provide much more than a simple chart logging the emails I sent out to prove that I have done my due diligence and engaged the membership properly. These proponents need to be asked to offer more real, meaningful efforts on their part to properly work with us. There is very little curiosity to know us and our priorities in relation to their projects outside of what they are being forced to do as part of this process, so perhaps it is time to force them to do a little bit more, and ask them to rise to the challenge of real change going forward.

It would be great to see the development of an IESO Indigenous Engagement Training Program for Proponents. The program should be Indigenously informed and led. It could be used to bring awareness about what has happened historically, to explain why these engagements are so critical, and to help guide their side of the process more meaningfully and effectively. Most of the individuals we are working with are at an age where this sort of

	curriculum was not available to them in their educational paths, which is perpetuating a lack of understanding as to why it is essential that we all live up to the TRCC Calls to Action. The only remedy for this situation is to provide educational programming now, and the only entity with the authority to see something like that through as part of this process is the IESO.
--	--

General Comments/Feedback

Thank you so much for the opportunity to provide some feedback on behalf of CFN. My apologies for the odd formatting – I was unable to correct what was going on with this form.