

IESO Engagement

From: Janet Macbeth
Sent: July 28, 2023 11:55 AM
To: IESO Engagement
Cc: Indigenous Relations
Subject: WIFN LT RFP comments

Dear IESO LT-RFP Team,

First Nations should be incentivized to form partnerships within their traditional territory at the maximum level possible. Proposed changes to the rated criteria appear to have been added because the results of the last round (and the results of LRP-2 for that matter) included indigenous participation projects where the First Nation was clearly out of their asserted territory. The proposed solution of assigning 3 points (1 for economic interest greater than 10%; 2 for economic interest greater or equal to 50%; and 1 point for attesting that the project is within the traditional territory indigenous partner is flawed. By far, most indigenous participation projects are within the traditional territory of the indigenous partner. It is important not to disadvantage these First Nations in the rule change.

The main disadvantage is the elimination of 2 points offered for projects with indigenous participation levels at 25% to under 50%. Local First Nations will automatically get the 1 point for location in traditional territory, so it is mainly only two points left for equity participation levels. There is little incentive for a partnering company to offer any more than 10% to the First Nation if neither one of them is prepared to partner at a 50% or greater level. This will result in fewer participation projects between 10% and 50%. Under the proposed changes a far northern indigenous entity with a 50% economic interest, and a local First Nation with 49% would be competing equally as both would have 2 points awarded. This is still a lopsided benefit to the entity which is 1000s of km away and goes against the spirit of why these incentives were put in place. Equity interests allow for accommodation and benefits to flow from economic activity within traditional territories. The new proposals lessen these benefits.

Our recommendation is to return to 1 point for 10% equity, 2 points for 25 to under 50%, and 3 points for 50% or greater and to deal with the Indigenous entities far outside their territories in a different way. One possible solution would be to require that at least 10% of the economic interest be held by a First Nation whose traditional territory the project is sited to even qualify for indigenous participation points. This would make sure that there is always local First Nation involvement in an indigenous participation project.

Sincerely,
Janet

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