



**Minodahmun
Development** LP

101 Poplar Crescent
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P.O. Box 89
Longlac, Ontario P0T 2A0

May 10, 2022

Lesley Gallinger
President and CEO, IESO
1600-120 Adelaide Street West
Toronto, ON M5H 1T1
Via email: [REDACTED]

Re: Comments on the IESO's Long-Term Request for Proposals process – Minodahmun Development Corporation representing Aroland, Ginoogaming and Animbiigoo Zaagi'igan Anishinaabek First Nations

Dear Ms. Gallinger,

Please accept these comments from Minodahmun Development Corporation (“**Minodahmun**”) representing Aroland, Ginoogaming and Animbiigoo Zaagi'igan Anishinaabek First Nations regarding the IESO's Long-Term Request for Proposals (the “**LT1 RFP**”), which is intended to acquire capacity services to meet system reliability needs from New Build Electricity resources starting in 2027 or earlier.

Minodahmun Development LP (Minodahmun) is a three First Nation partnership that began in 2016, when Animbiigoo Zaagi'igan Anishinaabek, Aroland First Nation and Ginoogaming First Nation joined to work in partnership to advance the interests of the Nations and the regional economy, inclusive of the Greenstone region, the multi-billion dollar Greenstone Gold Mine in Geraldton, and the Ring of Fire. Our First Nations' unified approach led to the formation of Minodahmun Development LP in September 2019 to jointly manage business opportunities and advance employment preparedness in our First Nations related to mining and other industrial projects. Minodahmun (Ojibway): “a clear path.”

Minodahmun's goal is to ensure our First Nations benefit from development in our Territories and generate own-source revenue—revenue that Indigenous governments raise by generating business and other income. As the region within our collective territories transforms into Ontario's newest mining hub, where rail and highway transportation corridors will intersect with transportation to and from the Ring of Fire, Minodahmun's objective is to become the region's leading Indigenous-owned company to support industrial projects. Minodahmun has specific interests in advancing energy generation and storage in the region, given the ongoing frequent and long-duration outage issues with the A4L transmission line, and growing electricity demand associated with mining and forestry operations in the region.

We understand the IESO's LT1 RFP, together with the associated “Expedited Process,” is expected to competitively procure year-round effective capacity from dispatchable New Build resources, including New Build hybrid electricity generation and storage facilities, registered or able to become registered in the IESO Administered Markets, larger than 1 MW and which can deliver a continuous amount of Electricity to a connection point on a Distribution System or Transmission System for at least four

consecutive hours. Minodahmun is keenly interested in participating in the LT1 RFP for between 5 to 10 MW in the Geraldton area in association with the A4L and local distribution systems.

The current iteration of the LT1 RFQ will establish Qualified Applicants for two categories of Long-Term Capacity Projects based on the nameplate capacity of potential Long-Term Capacity Projects. Each Long-Term Capacity Project will be categorized as either:

- a) a Long-Term Capacity Project with a nameplate capacity which is equal to or above 1 MW but less than 5 MW (each a “Small-Scale LT1 Project”); or
- b) a Long-Term Capacity Project with a nameplate capacity which is equal to or above 5 MW, subject to a maximum of 600 MW (each a “Large-Scale LT1 Project”).

Minodahmun Comments:

1) Revising the definition of “Small-Scale LT1 Project” for northwestern Ontario to better reflect reliability and supply needs

To assist proponents focused on electricity reliability services in northwestern Ontario, Minodahmun recommends that the “Small-Scale LT1 Project” definition for northwestern Ontario be restated as “a Long-term Capacity Project with a nameplate capacity which is equal to or above 1 MW but less than 11 MW.” Several transmission and distribution systems in northwestern Ontario experience frequent and long-duration electricity outages, and some systems adjacent to growing mineral resource sectors will see electricity demand increases when new mining projects begin operation. By providing northwestern Ontario flexibility from 1–10 MW for “Small-Scale LT1 Project,” the IESO and qualified proponents will be in an efficient position to provide necessary capacity to connection points on the Distribution System or Transmission System to meet local needs for at least four consecutive hours.

Revising the “Small-Scale LT1 Project” definition for northwestern Ontario for a 1–10 MW range will also enable proponents of regionally important projects from 5–10 MW to enter the procurement as “Small-Scale proponents, which is more suitable for proponents, including First Nation proponents or First Nation joint ventures, to more easily qualify to enter into the procurement process.

2) Indigenous Participation in the RFQ Process

Minodahmun agrees with the IESO’s position that Indigenous participation in Ontario infrastructure projects is important; however, the IESO should reflect the importance of Indigenous participation in *both* the RFQ process and the RFP process, not just in the RFP process. Indigenous proponents and Indigenous joint-ventures with non-Indigenous proponents will have greater opportunities to gain project Crown and Indigenous approvals and meet the IESO’s deadlines to secure the required electricity. Indigenous proponents and Indigenous joint-ventures with non-Indigenous proponents should be awarded “points” or similar in the RFQ process as highly valued RFP participants, using a graduated scale of points based on the relative percentage of Indigenous participation in the proponent entity.

3) Indigenous Participation in the RFP Process

The IESO is proposing that all projects electing to participate in the Expedited process and the LT 1 RFP attain either a Municipal Council Support Resolution or an Indigenous Community Support Resolution, depending on where the project is proposed. Minodahmun agrees with this proposal. Minodahmun also agrees with the IESO's position that Projects able to demonstrate Indigenous participation (economic interest) will attain rated criteria points. Minodahmun supports a graduated rated criteria points award schedule that awards significantly higher points to projects with Indigenous economic interest at 50% or higher.

We thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Glover', followed by a long horizontal flourish.

John Glover, CEO
Minodahmun Development LP

Cc:

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