

Akwesasne, May 3, 2022

By email: engagement@ieso.ca

Independent Electricity System Operator  
1600-120 Adelaide Street West  
Toronto, ON M5H 1T1

**Re: Comments on Gatineau Corridor End-of-Life Study**

Greetings on behalf of the Haudenosaunee Confederacy Chiefs' Council (HCCC). The HCCC is now at the top of the Crown's list for consultations regarding developments on our Traditional Lands. This is a responsibility we take very seriously. We want to help encourage sustainable development to the benefit of our People and all Ontarians.

In accordance with this role and our traditional intergenerational responsibilities, we are submitting these comments regarding the IESO's Gatineau Corridor End-of-Life Study. Our approach to reviewing this study at its early stage is comprehensive in scope and factors in the following:

- We favour investments that will facilitate the economic growth of Ontario in a sustainable manner for the benefits of all our Peoples.
- We recognize that these investments must be made so that they meet the mandate of the IESO to promote an efficient electricity market and reliable power grid in Ontario.
- Our obligation to our ancestors and descendants requires that these investments are made in a way that respects the primordial importance of the natural environment across the Haudenosaunee Traditional Lands.
- Our desire and right to have meaningful equity participation in the eventual capital projects and operations that will be the outcome of the Gatineau Corridor End-of-Life Study.

Using the principles above, we have the following comments for your consideration in the Gatineau Corridor End-of-Life Study. For your convenience we have repeated the comments below in a one-page format attached to this letter. We encourage you to use the attached page as our contribution to your feedback page related to this study on the IESO Website.

Feeding the demand in Ottawa and Eastern Ontario from generation sources that are as close to these load centres as possible is desirable both from an efficiency and environmental point of view. This would involve building new transmission connecting Chat Falls to Merivale to Hawthorne to St Lawrence or some version thereof. The advantage of this local approach would be to avoid any proposed corridor routing that runs lines west through environmentally sensitive areas only to reroute power back east to meet local Eastern Ontario demand. If we can reduce the stress on the ecosystem of the Algonquin Park region, while more efficiently transmitting Ontario's energy resources, we will create a sustainable economic development win. Indeed, discussions with our technical partners indicate that it would be possible to even remove existing lines from Algonquin Park and allow the land to be rehabilitated. It is our opinion that the 230kV lines that form the Gatineau transmission corridor represent a major intrusion into the pristine wilderness that is Algonquin Park. Rather than perpetuating this intrusion for yet another 100 years, the IESO should concentrate their efforts on developing options that would allow for the removal of these lines from within the Park.

Slide 39 of the IESO's Gatineau Corridor End-of-Life Study presentation states that a new double circuit 230 kV transmission line will be required to secure the loads in the Peterborough/Quinte West area, south of Algonquin Park, *irrespective* of the future status of circuits T22C and T33E. This implies that the forecast load in Peterborough/Quinte West area can be supplied without any contribution from lines running through the Park.

Since, as far as we are aware, there are no loads within the Park that are supplied directly from the lines that form the Gatineau Corridor, then the only requirement for the continued existence of these lines is to provide a path for the output from the hydroelectric generating facilities on the Madawaska and Ottawa Rivers to reach southern Ontario. If the output from these generating facilities were to be used to supply the local load in the Ottawa area, then there wouldn't be any obvious need for retaining these lines in service. We are therefore opposed to any plan that would perpetuate the existence of the lines that comprise the Gatineau Corridor beyond the southern boundary of Algonquin Park.

Finally, we think the study should encourage solutions that will increase the efficiency of the electricity market in Ontario. Therefore, the Haudenosaunee, through the Haudenosaunee Development Institute (HDI), have created a partnership with deep financial and technical abilities. This partnership is capable of financing, designing, building, and operating any new or refurbished transmission infrastructure recommended in the study. Our partners include project development capabilities through Transmission Infrastructure Partnerships Inc. and Grid Reliability LLC, the financial backing arranged by Drexel Hamilton Investment Banking and the experience in network building and operation of Ameren Transmission. The introduction of this HDI led consortium would not only allow HCCC to have a seat at the table in these important developments, but it would also introduce a strong competitive player to the Ontario energy market which has enormous upside potential for Ontario consumers.

We are very excited about the opportunities that the IESO and Ontario may initiate and generally support sensible development. We wish to find ways for the Haudenosaunee to participate in building the future for our peoples and for all Ontarians.

In Peace and Friendship,

Michael Kanentakeron Mitchell  
Eastern Director,  
Haudenosaunee Development Institute  
(Original Signed by M.K.Mitchell)

CC:

Ahmed Maria, Director - Transmission Planning IESO [REDACTED]  
Candice Trickey, Director of Corporate Affairs IESO [REDACTED]  
Jordan Penic Senior Manager Engagement and Indigenous Relations at IESO [REDACTED]  
Clare Gutjarh, Advisor, First Nation and Métis Relations IESO, [REDACTED]

Attachments: *Comments on the Gatineau East Corridor Study made behalf of the Haudenosaunee Development Institute*

# Comments on the Gatineau Corridor End-of-Life Study made on behalf of the Haudenosaunee Development Institute

Name: Michael Kanentakeron Mitchell

Title: Eastern Director

Organization: Haudenosaunee Development Institute

Email: [REDACTED]

Date: May 4, 2022

Topic	Feedback
What additional information should be considered in the study assumptions to determine electricity needs?	See Comments Below
What feedback is there on the recommended scope of refurbishment for the EOL facilities and integrated solution package?	See Comments Below
What information should be considered in finalizing the recommendations?	See Comments Below

- Feeding the demand in Ottawa and Eastern Ontario should be made from generation sources that are as close to these load centres as possible.
  - This is desirable both from efficiency and environmental points of view.
  - This would involve building new transmission in the Gatineau region connecting Chat Falls to Merivale to Hawthorne to St Lawrence.
- The advantage of this local approach would be to avoid any proposed corridor routing that runs lines west through environmentally sensitive areas only to reroute power back east to meet local Eastern Ontario demand.
  - We can reduce the stress on the ecosystem of the Algonquin Park region, while more efficiently distributing Ontario's energy
- It is even possible and desirable to remove existing lines from Algonquin Park and allow the land to be rehabilitated.
  - It is our opinion that the 230kV lines that form the Gatineau transmission corridor represent a major intrusion into the pristine wilderness that is Algonquin Park. Rather than perpetuating this intrusion for yet another 100 years, the IESO should be

concentrating their efforts on developing options that would allow for the removal of these lines from the wilderness preserves in the Park.

- Slide 39 of the IESO's Gatineau Corridor End-of-Life Study presentation states that a new double circuit 230 kV transmission line will be required to secure the loads in the Peterborough/Quinte West area, south of Algonquin Park, *irrespective* of the future status of circuits T22C and T33E. This implies that the forecast load in Peterborough/Quinte West area can be supplied without any contribution from lines running through the Park.
- There are no loads within the Park that are supplied directly from the lines that form the Gatineau Corridor.
  - Therefore, the only justification to continue the operation of these lines is to provide a path for the output from the hydroelectric generating facilities on the Madawaska and Ottawa Rivers to reach southern Ontario.
  - If the output from these generating facilities were to be used to supply the local load in the Ottawa area using new local transmission lines mentioned above, then the lines traversing the Park would no longer be needed.
- We are therefore opposed to any plan that would perpetuate the existence of the lines that comprise the Gatineau Corridor beyond the southern boundary of Algonquin Park.
- The Corridor Study will no doubt call for the commissioning of new lines in the Gatineau region. It is our belief that the people of Ontario would be best served if these projects were awarded to qualified developers in a fair and open competition, with the full participation of Indigenous Peoples.