

Feedback Form

Regional Electricity Planning in the GTA East Region – April 20, 2026

Feedback Provided by:

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Date: May 11, 2026

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

Following the GTA East regional planning webinar held on April 20, 2026, the Independent Electricity System Operator (IESO) is seeking feedback on the identified electricity needs and initial screening of potential options. A copy of the presentation as well as recording of the session can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by May 11, 2026.

Topic	Feedback
What feedback do you have on the wire and non-wire options that will be	Click or tap here to enter text.

Topic	Feedback
considered to meet the region’s electricity needs?	
What additional information should be considered in the evaluation of wire and non-wire options?	Click or tap here to enter text.
Are there other types of information that would be helpful for us to provide in future engagements to enhance understanding of community perspectives and insights?	Click or tap here to enter text.

General Comments/Feedback

1. Introduction

The Mississaugas of Scugog Island First Nation (MSIFN), as part of the Michi Saagiig Anishinaabeg and signatories to the Williams Treaties, appreciates the opportunity to provide comments on the GTA East Regional Electricity Planning engagement and GTA East Region Scoping Assessment Outcome Report April 25, 2025.

The GTA East region, extends from Lake Ontario northward to the southern parts of Scugog and Uxbridge, and includes the municipalities of Pickering, Ajax, Whitby, Oshawa and parts of Clarington within Durham Region. MSIFN is the only First Nation community located within the GTA East region, and the single IRRP that covers the entire GTA East region. Simultaneously, MSIFN is actively engaged in numerous concurrent major energy files across the GTA East and beyond. MSIFN is also engaged in strengthening relationships with LDCs in the GTA East Region, including Elexicon, Oshawa Power and Hydro One Networks.

MSIFN Consultation requests that the GTA East Land Acknowledgement be revised to explicitly state that the IESO acknowledges that the GTA East is the traditional territory of the Mississaugas of Scugog Island First Nation.

MSIFN has a vested interest in this planning process due to the direct and indirect impacts on treaty rights, unceded territories (including lands beneath Lake Ontario), cultural heritage, economic reconciliation opportunities, and existing and planned MSIFN capital investments in energy generation, storage and transmission infrastructure in the GTA East Region.

These comments are also grounded in responsibilities as stewards of these lands and waters and reflect principles from UNDRIP, the Truth and Reconciliation Commission Calls to Action, and Section 35 of the Constitution Act, 1982.

2. Alignment with Bulk System Planning and the “Third Supply”

MSIFN Consultation notes that the GTA East IRRP is explicitly linked to the South and Central Bulk Plan, including the proposed:

- New 500 kV transmission line from Bowmanville toward the GTA; and
- New HVDC “Third Supply” submarine cable under Lake Ontario.

These elements are consistent with previous IESO recommendations on the Toronto Third Line, which MSIFN has commented on extensively.

Key Position:

MSIFN Consultation reiterates that any HVDC or in-water transmission infrastructure under Lake Ontario triggers significant rights-based concerns.

As previously stated,:

- The lakebed south of the Gunshot Treaty boundary remains unceded Michi Saagiig territory.
- These projects trigger the Duty to Consult and Accommodate and require consent.
- Impacts may include disruption to aquatic ecosystems, submerged cultural heritage sites, and treaty-protected harvesting areas.

Recommendation:

IESO must:

- Integrate Lake Ontario-specific rights analysis into the GTA East IRRP.
- Ensure early-stage engagement with MSIFN and other Michi Saagiig Nations prior to narrowing options.
- Align regional planning with bulk planning obligations to Indigenous rights.

3. Concerns with Options Screening Approach

The April presentation indicates that:

- Both wire and non-wire options have been screened in, but
- Certain system needs (e.g., load security) are effectively limited to wire solutions (i.e., new transmission).

Concern:

This approach risks pre-determining outcomes in favour of large transmission infrastructure, including those with significant Indigenous and environmental impacts.

Additionally, screening criteria emphasize:

- Technical feasibility
- Cost-effectiveness
- Timing

However, Indigenous rights, cumulative impacts, and jurisdiction are not clearly embedded as core screening criteria.

Recommendation:

IESO should:

- Treat First Nation treaty rights and land rights as core evaluation criteria, not secondary “community considerations”.
- Demonstrate how First Nation rights-holder and First Nation energy system investor input shapes scenario design, not just feedback after screening.
- Revisit screening outcomes where non-wire alternatives could defer or reduce high-impact infrastructure.

This aligns with prior submissions emphasizing that First Nation rights-holder participation must occur at assumption-setting and scenario development stages, not after key decisions are made.

4. Cumulative Impacts and Regional Context

MSIFN remains concerned that:

- Multiple projects are advancing simultaneously (Darlington SMRs, Pickering decommissioning, Durham-Kawartha line, Bowmanville line, Toronto Third Line marine cable, bulk system upgrades, multiple GTA East LDC capital infrastructure projects)
- These are not being assessed collectively for cumulative impacts

Previous MSIFN submissions clearly identified the need for a comprehensive cumulative effects assessment across:

- Transmission and distribution expansions
- Nuclear facility changes
- Water and wastewater infrastructure
- In-water works in Lake Ontario

Recommendation:

IESO must:

- Undertake or require a regional cumulative impact framework that spans IRRP, Bulk Plan and LDC infrastructure initiatives.
- Clearly identify which entity is responsible for cumulative effects assessment.
- Incorporate Indigenous knowledge and monitoring into cumulative assessment design.

5. Economic Reconciliation and First Nation Participation

The GTA East IRRP identifies a range of potential solutions:

- Transmission upgrades
- Storage and generation
- Demand-side management

However, there is no explicit discussion of First Nation ownership or economic participation. MSIFN Consultation estimates that Ontario First Nations have approximately \$25 Billion capital investment in current, contracted and designated Ontario energy projects, with more on the way as capital requirements increase and First Nation capital is increasingly recognized as an alternative to proponent debt and strained availability of proponent capital. MSIFN estimates that Williams Treaties First Nations investments in GTA East Energy infrastructure may reach or exceed \$3 billion in the next decade.

MSIFN Position:

MSIFN has consistently advocated that:

- First Nations are rights-holders and economic partners, not stakeholders.
- Projects affecting First Nation treaty territories must include equity opportunities and revenue sharing.
- Hydro One's 50% equity model provides a clear precedent for additional First Nation equity to assist Ontario with electricity expansion.

Recommendation:

IESO should:

- Require First Nation equity participation models for:
 - Transmission projects and critical LDC infrastructure
 - Storage and DER procurements
 - Energy efficiency and demand-side programs
- Ensure economic reconciliation is embedded as a design principle across all option types

6. Need for Early and Structured Engagement

The April presentation emphasizes ongoing engagement, with feedback influencing planning outcomes.

However, previous experience shows:

- First Nation participation often occurs after major assumptions are set
- Access to technical information is limited

Recommendation:

IESO should:

- Establish a government-to-government engagement framework specific to GTA East
- Provide:
 - Early access to modelling assumptions
 - Plain-language and technical materials
 - Capacity funding for participation
- Engage MSIFN prior to the next phase of detailed options analysis (Q3–Q4 2026)

7. Alignment with Low-Carbon and Indigenous Energy Priorities

MSIFN supports reliable and low-carbon energy but emphasizes that:

- Energy transition must align with Indigenous energy strategies
- Planning should integrate:
 - DERs and distributed battery storage
 - Renewable energy
 - Renewable natural gas (RNG)

Previous submissions stressed the need to:

- Prioritize low-carbon pathways
- Leverage First Nation-led energy development and capital

8. Key Requests

MSIFN requests that the IESO:

1. Engage immediately with MSIFN prior to finalizing options analysis.
2. Integrate Indigenous rights and jurisdiction as core planning criteria.
3. Undertake, with MSIFN and other interested First Nation rights-holders, cumulative effects assessment across all related projects.
4. Ensure First Nation equity participation across all infrastructure and non-wire solutions.
5. Provide draft options analysis materials in advance of publication.
6. Align GTA East IRRP with obligations arising from the Toronto Third Line / HVDC project.

9. Conclusion

MSIFN remains committed to collaborative, rights-respecting solutions that support reliable and sustainable electricity planning. However, achieving this requires a fundamental shift from engagement to co-development, where rights-holding First Nations are involved in shaping planning assumptions, infrastructure pathways, and economic outcomes.

We look forward to continuing dialogue with the IESO.

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Don Richardson

On behalf of MSIFN Consultation

Mississaugas of Scugog Island First Nation