



October 24, 2025

Project Name: Toronto Integrated Regional Resource Plan
DOCA Project Number: 2025-0891
Proponent: Independent Electricity Systems Operator
Approval Authority: Ministry of Energy and Mines

Dear Keir Johnston,

This letter is to confirm receipt of the project-related correspondence sent by the Independent Electricity Systems Operator (“IESO”), on October 17 and 20, 2025, regarding the Toronto Integrated Regional Resource Plan (“IRRPP”). Please note that our feedback primarily relates to the new supply options for Eastern Toronto (Section 7.8 of the draft report produced by IESO).

The Mississaugas of the Credit First Nation (MCFN) are the Treaty Holders of the land on which the project will take place – specifically, the Toronto Purchase Treaty #13 (1805). Furthermore, the MCFN hold unceded Aboriginal title to the Rouge Valley and to the water and lands under the water of Lake Ontario. Therefore, the MCFN holds Indigenous and Treaty Rights specific to the proposed project location and its environs, which may be adversely impacted by it. The Department of Consultation and Accommodation (DOCA) is designated by the MCFN to handle consultation matters on its behalf.

The DOCA consultation team has reviewed the project-related correspondence identified above, in addition to any associated documentation. The following DOCA Units have completed a review and their questions and comments have been included below.

Consultation Unit

Primary Reviewer: Megan DeVries

Questions and Comments

- Information about MCFN’s treaties and title claims is not adequately reflected in the report drafted by IESO (see paragraph #2, above). The report must include proper acknowledgement of MCFN’s and its ongoing stewardship of its territory prior to finalization, both in the Executive Summary/Introduction and the section on Indigenous engagement.
- The MCFN continues to have a high level of concern regarding both the manner in which engagement with our Nation was carried out by IESO and the recommendation being put forward by IESO in the draft report to address supply needs for Eastern Toronto.



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- The Ministry of Energy and Mines (MEM) cannot rely on the engagement with MCFN carried out by IESO during the drafting of its recommendations report to decide which option to recommend. A Crown decision carries with it the Duty to Consult and Accommodate. Should MEM make a decision without carrying out its own consultation with MCFN, it will have failed in this duty.
- The IESO recommendation and engagement process is clearly not equipped to handle a recommendation of this size, scale, and potential Aboriginal and Treaty Rights impact. The fact that the IESO makes a recommendation with no consideration of the archaeological and environmental impacts of their proposal, only the consideration of supply demands, is a flaw in their mandate. This has resulted in a situation where IESO was unable to engage adequately with MCFN because understanding, answering, and addressing potential impacts to Aboriginal and Treaty Rights was not within their scope.
- Questions not adequately answered by IESO which would assist MCFN in determining potential impacts to our Aboriginal and Treaty Rights include:
 1. What will emergency repairs on the underwater cable entail?
 2. What remediation options are available? What remediation options are required as standard by the approval authority following installation? What remediation options are required should there be emergency repairs required for the underwater cable?
 3. Can and by how much can the path of the underwater cable be adjusted to avoid Species at Risk, their habitat, and/or marine archaeological resources? (MCFN understands IESO has not recommended any specific routing. We are asking **if** and **by how much** can the pathing be adjusted – i.e., what are the allowances of the technology itself?)
- Therefore, MEM must directly consult MCFN following receipt of the IESO report and prior to making any decision about proposed supply options for Eastern Toronto in order to satisfy their duty to consult and accommodate.

Archaeology Unit

Primary Reviewer: Adam LaForme

Questions and Comments

- The IESO's recommendation for a 65 km submarine HVDC transmission line under Lake Ontario introduces substantial archaeological uncertainties that cannot be addressed through the current planning level documentation. The draft IRRP provides no assessment of potential impacts to submerged cultural landscapes, Indigenous archaeological sites, or previously unknown resources that may exist along the lakebed corridor between Bowmanville and the Hearn Station.
- Marine archaeology in the Great Lakes remains a developing field in Ontario, and there are significant unknowns regarding the extent and preservation of submerged archaeological and paleo-landscape features that may exist beneath or adjacent to the proposed cable alignment.



- Until a marine archaeology assessment is undertaken there is insufficient information to understand or mitigate the potential impacts. The absence of baseline data makes it impossible to characterize the risks with confidence. These issues must be fully examined and resolved through detailed study and consultation before any preferred route is endorsed.

Environment Unit

Primary Reviewer: Lindsay Wong

Questions and Comments

- Two reports were reviewed to help assess potential impacts of electromagnetic fields from buried transmission cables on aquatic life. Research was also conducted to supplement the two reports. Overall, the impacts of the electromagnetic fields from buried transmission cables on aquatic life were inconclusive. Some species were impacted while others were not.
- MCFN is concerned about the applicability of the two reports as they discussed saltwater systems and the proposed transmission cable would be in a freshwater system.
- Extensive research would need to be conducted to understand what the long-term impacts would be on freshwater systems.
- IESO noted that depth of cable and cable route were the two options prior to installation of the transmission cable. Continued concern about what mitigation measures would be available once the transmission cable is installed.

Mississaugas of the Credit Business Corporation

Primary Reviewer: Warren Sault

Questions and Comments

- The Mississaugas of the Credit First Nation have noted that the right to economic opportunity, including involvement in the Energy Sector, is a Treaty Right. In order to achieve its objective of economic reconciliation and inclusion of First Nation communities in the Energy Sector, IESO must commit to adopting a treaty-forward approach to the development of energy projects within the Province of Ontario. In regard to the Toronto Integrated Regional Resource Plan (“IRRP”), this would include:
 - MCFN equity participation (50%), as the only First Nation partner, in energy projects developed within MCFN Treaty Territory, as per recommendations contained within the plan.
 - Implementation of a procurement policy which recognizes the right to economic opportunity as a Treaty Right and provides priority for MCFN as the Treaty holder for energy projects developed within MCFN Treaty Territory, as per recommendations contained within the plan.

Until the questions, concerns, and/or interests identified in this letter have been satisfactorily addressed, the proposals within IESO’s report must not receive approval. We

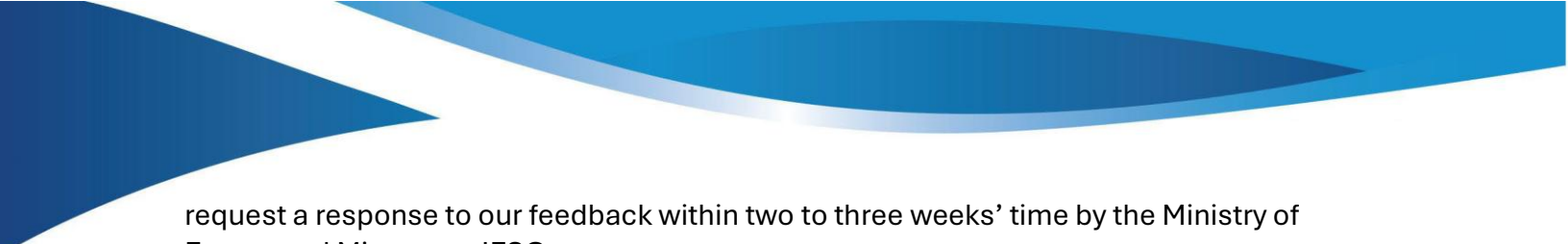


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request a response to our feedback within two to three weeks' time by the Ministry of Energy and Mines, not IESO.

DOCA expects to be notified of any and all future project updates and/or changes.

If you have any questions for the DOCA consultation team, please feel free to contact us.

Thank you,

Megan DeVries

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[REDACTED]

CC

Mississaugas of the Credit First Nation

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