



May 28, 2026

Independent Electricity System Operation (IESO)  
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## **Re: Feedback on South and Central Bulk Plan**

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Deshkan Ziiibiing, or Chippewas of the Thames First Nation (“COTTFN”), is an Anishinaabe First Nation with inherent and constitutionally protected rights, as affirmed by section 35 of the *Constitution Act, 1982*. COTTFN is signatory to several pre-Confederation Treaties in southwestern Ontario, including the Longwoods Treaty, to which COTTFN is the sole First Nations signatory. COTTFN’s territory was also recognized in the Big Bear Creek Land Claim Settlement Agreement (2013).

COTTFN Consultation staff have reviewed the April 30<sup>th</sup> webinar materials on the draft South and Central Bulk Plan. The South portion of the Bulk Plan falls within COTTFN’s territory. The draft recommendation (Portfolio B) contains new transformer stations and hundreds of kilometers of new transmission lines. These proposed lines are in addition to several other transmission projects already in construction or development, including St Clair, Longwood to Lakeshore, Windsor to Lakeshore, and Energizing Essex.

### Rights Impacts

In the 2026 Annual Planning Outlook, the IESO is forecasting 65% electricity demand growth by 2050. With growing demand in the region, more transmission infrastructure will be required, and COTTFN is involved as a co-owner of the Chatham to Lakeshore line. However, COTTFN has an obligation to ensure that major projects do not compromise the ability of COTTFN citizens to meaningfully exercise their rights. Without more information, it is too early in the process to assess or mitigate specific impacts to Aboriginal and treaty rights. However, it is undeniable that this scale of infrastructure expansion would have significant impacts.

The vast majority of COTTFN’s territory is either disturbed, privately-held, or otherwise incompatible with the exercise of Aboriginal and treaty rights by the citizens of COTTFN. Through a preliminary cumulative effects analysis, over 88% of COTTFN’s territory is disturbed by anthropogenic footprint, including agriculture, transportation, and industry. Accessible land for hunting has declined by 92% since the precolonial era.

In previous focus groups and surveys for transmission lines, citizens of COTTFN have consistently communicated that their land use is impaired by multiple factors leading to significant constraints on their ability to meaningfully exercise Aboriginal and treaty rights. Top concerns included loss of habitat, fewer animals in the area, contamination, noise (construction and operations), and





application of pesticides to the right of way.

Looking at Portfolio B, it appears that a line connecting Lakeshore to the proposed St Thomas TS is preferred over doubling the Longwood to Lakeshore line. Parts of the Lakeshore to St Thomas line would mirror a previously rejected route for Longwood to Lakeshore. If that line proceeds, it is as though two Longwood to Lakeshore route options were selected. COTTFN is aware of citizens that exercise their rights on the lands and waters in that area.

COTTFN requires direct consultation with IESO and the Ontario government on the proposed portfolio of projects and capacity funding to assess impacts to COTTFN's rights from a cumulative perspective. Project-specific class environmental assessments cannot encompass or properly communicate the spirit of the land and Anishinaabe'aadziwin. COTTFN and sister communities in the Waawayaatonong Treaty Council require the opportunity to conduct Indigenous-led Impact Assessments that are inclusive of cultural rights. Full participation from the early planning stage enables the exercise of free, prior and informed consent, which is required by the *United Nations Declaration on the Rights of Indigenous Peoples* and domestically through the *Declaration on the Rights of Indigenous Peoples Act*.

### Economic Participation

COTTFN must have the ability to economically participate in any new transmission projects in the territory, including equity and non-equity options. At least some of the proposed projects in the recommended portfolio would fall under the new Transmitter Selection Framework, which includes contractually binding Indigenous Engagement and Participation Plans. Hydro One has the 50/50 equity model and any new transmitters in the territory must at least meet that standard. To facilitate equity participation for this scale of infrastructure, COTTFN has been advocating tirelessly for a First Nations Sovereign Wealth Fund. There is a lot of room for improvement in other forms of participation, including employment, training, and procurement. Any new transmission infrastructure must be true partnerships where Rights Holders are substantive owners and participants. Economic participation, however, is not the same as accommodation. The Crown must separately accommodate COTTFN for adverse impacts to Aboriginal and treaty rights.

### Information Requirements

We understand that bulk planning is at a high level and route specific information would come at a later stage, likely through the selected transmitter. However, it is concerning that analysis of portfolio options does not appear to include environmental constraints or impacts to Aboriginal and treaty rights. To facilitate early consultation, COTTFN requests detailed mapping with treaty boundaries and environmentally sensitive areas as soon as possible in the process to identify concerns.





IESO Engagement

COTTFN appreciates the IESO's transparency in its planning processes and frequent engagement with stakeholders. That said, given the rights implications of bulk planning, the IESO should be doing targeted engagements with Treaty Rights Holders. First Nations are dealing with huge consultation demands on limited capacity. Staff cannot attend all the IESO webinars to glean key information. Region specific notification letters through each Nation's standard consultation process would be more effective. While bulk planning is at a high level, it sets in motion decisions that are difficult to modify at later stages.

We welcome the opportunity to continue this discussion at a future meeting.

Sincerely,

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