

# Feedback Form

## South and Central Bulk Planning Update Webinar

### Feedback Provided by:

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To promote transparency, the submitted feedback will be posted on the South and Central Bulk Plan engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback following the April 30, 2026, presentation of the draft recommendations for South and Central Bulk Plan. A copy of the presentations as well as recordings of the sessions are available on the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by May 21, 2026.**

## South and Central Bulk Plan - Feedback

The April 30, 2026, webinar focused on the draft South and Central Bulk Plan recommendations as presented. With the plan objectives and scope established, we are seeking feedback on clarity, understanding, and considerations important to note as the plan moves toward finalization.

Question	Feedback
What additional data or context would help provide more clarity and for consideration in the final report?	
What questions or concerns do you have about the draft recommendations that the IESO might consider in future planning activities?	
What additional data or local considerations should the IESO be aware of in finalizing the draft recommendations, or for future planning?	

## General Comments/Feedback

### Introduction

The Mississaugas of Scugog Island First Nation (MSIFN), as rights-holders within the Williams Treaties territory and part of the Michi Saagiig Anishinaabeg, provides the following comments on the South and Central Bulk Plan draft recommendations.

MSIFN acknowledges that the IESO is advancing a significant suite of transmission recommendations to address growing electricity demand across southern Ontario.

However, these recommendations include infrastructure that intersects, traverses, and impacts MSIFN treaty lands, traditional territory, and waters, including Lake Ontario, a point that is not explicitly recognized in the presentation materials and must be addressed as a foundational planning requirement.

The draft recommendations include major new bulk transmission infrastructure, including:

- New 500 kV transmission lines from Bowmanville toward the GTA.
- Potential HVDC transmission (“Third Supply”) from Bowmanville to Toronto (Hearn).

- Multiple additional 500 kV corridor expansions and bulk supply nodes across southern Ontario.

These facilities directly engage and potentially impact:

- MSIFN treaty lands under the Williams Treaties
- Unceded lands, including submerged lands beneath Lake Ontario
- Traditional harvesting areas and cultural heritage sites located both on-shore and in-water

Key Clarification for the IESO: The presentation treats these transmission corridors primarily as technical system solutions. However, these are not neutral corridors - they are rights-bearing landscapes and waters under active jurisdictional interest of MSIFN and other Michi Saagiig Nations.

### **OEB Decision and Order (EB-2025-0065)**

In a recent OEB Decision and Order, EB-2025-0065, the OEB notes, "that early and meaningful engagement is aligned with both the policies of the Government of Ontario... early and meaningful ongoing engagement is viewed as positive and proactive" and "is a process which involves the building of relationships through meaningful engagement".

In this decision the OEB further states: "At their core, the duty to consult, UNDRIP, and reconciliation are all underpinned by the notion of relationships, which itself relies on meaningful engagement."

In this context, the IESO's planning approach does not yet reflect a rights-based approach for such meaningful engagement.

The portfolio evaluation framework emphasizes only:

- Reliability performance
- System operability and resilience
- Cost-effectiveness
- Community/stakeholder feedback

Based on the materials reviewed, Indigenous rights, treaty jurisdiction, and territorial impacts are not presented as core screening or decision criteria in the portfolio evaluation.

This is inconsistent with the OEB's directions on meaningful engagement and MSIFN's prior position that:

- Rights must be integrated at the scenario and option design stage, and
- Not treated as secondary "community considerations" after technical decisions have been made.

Without integrating rights at the evaluation stage, the IESO's referred portfolios (e.g., Portfolio B) may embed obligations and conflicts that become difficult or impossible to resolve later.

## **“Third Supply” and Corridor Planning**

As we have previously noted, the Lake Ontario (“Third Supply”) raises distinct rights and jurisdictional issues. The recommendation for an HVDC transmission line from Bowmanville to Toronto via Lake Ontario is particularly significant and has not involved meaningful engagement or building relationships.

The bulk planning process neglects and avoids mentioning key matters, including the unceded lakebed, cumulative impacts of massive infrastructure projects, Section 35 rights, potential requirements for consent, disturbance of cultural heritage, effects on fisheries and harvesting.

IESO bulk planning is focused on IESO system optimization and IESO interests in corridor efficiency solutions and does not reflect legal and rights-based implications. The IESO emphasizes corridor preservation and actions to accelerate transmission development.

From MSIFN’s perspective, early corridor preservation decisions are among the most consequential planning steps, as they effectively lock in future land use and impact pathways. There is a need for meaningful engagement before corridor identification or protection decisions are finalized, and a need to treat corridor preservation as a rights-triggering activity, not a preliminary technical step.

The IESO should also engage on cumulative effects across multiple interconnected projects. The bulk plan confirms multiple concurrent developments, including:

- Large-scale transmission expansion
- Nuclear expansion (e.g., Bruce, Darlington)
- Storage and renewable integration
- Regional and distribution system upgrades.

This aligns with MSIFN’s prior concern that multiple energy projects are advancing simultaneously without meaningful engagement on cumulative impacts to rights and interests.

The key issue: bulk planning is occurring:

- At a scale that aggregates impacts across multiple regions,
- But without a corresponding regional cumulative effects framework.

Economic reconciliation must also be linked to transmission, generation and storage expansion. The plan emphasizes enabling economic growth and supporting electrification and regional development. However, there is no explicit recognition of First Nation equity participation in transmission development, distribution expansion, and related generation and storage requirements. This remains a critical gap given the scale of capital investment required (multi-billion-dollar infrastructure) and established precedents for Indigenous equity participation in Ontario energy infrastructure.

As we have previously identified, First Nations are both rights-holders and capital partners, not stakeholders.

## **Recognition of Williams Treaties First Nations**

The IESO presentation includes a general territorial acknowledgement referencing multiple First Nations and Treaty 13 lands in Toronto. However, there is no explicit recognition of the Williams Treaties First Nations as rights-holders in the GTA and Lake Ontario corridor. There is no acknowledgement that bulk transmission recommendations intersect Williams Treaties First Nations traditional territory and treaty-protected areas. This omission is significant given that the study areas include Williams Treaties First Nations traditional lands and jurisdictional interests and the Lake Ontario lakebed south of the Gunshot Treaty boundary remains unceded Michi Saagiig territory. The IESO must explicitly identify, within the final report:

- Which recommended transmission projects intersect specific treaty lands and traditional territory
- How those impacts are being assessed at the planning stage, not deferred to project-level processes

## **MSIFN requests that the IESO:**

1. Meaningfully engage with MSIFN and other interested rights-holding First Nations to explicitly map and disclose how all recommended transmission lines intersect MSIFN and other treaty lands and traditional territory.
2. Integrate Indigenous rights and jurisdiction as core criteria in portfolio evaluation and final recommendations.
3. Undertake a Lake Ontario-specific rights and impact assessment for any HVDC or in-water transmission infrastructure.
4. Pause corridor preservation decisions in MSIFN treaty and traditional areas until government-to-government engagement occurs.
5. Establish a cumulative effects framework spanning bulk, regional, nuclear, and in-water infrastructure.
6. Develop formal First Nation equity participation pathways tied to all transmission, distribution expansion, generation, storage, and bulk infrastructure investments.
7. Engage MSIFN at the scenario and modelling stage prior to finalizing the bulk plan.

## **Conclusion**

The South and Central Bulk Plan represents a generational build-out of Ontario's electricity system. However, the plan continues to treat transmission development as a primarily technical exercise while the recommended infrastructure directly engages MSIFN treaty lands, traditional territory, and water jurisdiction.

A fundamental shift is required. To move forward responsibly, the IESO must transition from 'engagement after technical design' to meaningful engagement for co-development planning with rights-holding First Nations at the planning and decision-making stage.

We look forward to positive discussions with the IESO regarding these important issues.