

# Feedback Form

## Future Clean Electricity Fund – October 13, 2023

### Generators

#### Feedback Provided by:

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Date: December 5, 2023

Following the October 13, 2023 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [Future Clean Electricity Fund](#) web page.

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **October 27, 2023**.** If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

| Topic  | Feedback  |
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| <p>What barriers for new electricity generation projects have you encountered in the province?</p> | <ul style="list-style-type: none"> <li>• The largest barrier that we encounter is <b><u>consultation time</u></b> and resources for our projects, and the lack of respect by the organizations who put in place these unrealistic timelines to respond.</li> <li>• We commend the IESO for recognizing the key role of I communities as rights holders and/or equity partners in recent procurement processes. However, there remains to be seen the action attached to that recognition. As landowners we still face significant financial barriers to participation which this fund could provide meaningful support to address.</li> <li>• Recommend removing barriers to Indigenous communities' access to FCEF Stream Four funds through: <ul style="list-style-type: none"> <li>○ Accessible/streamlined applications that do not require extraneous information, or information that is already available to the IESO through other avenues.</li> <li>○ Timelines that account for community activities (e.g., office closures in December, hunting/harvesting season in the summer); may wish to consider rolling applications rather than set deadlines with short lead time.</li> <li>○ Reduced reporting burden and/or community-IESO reporting partnership (e.g., oral reports provided to IESO contacts)</li> <li>○ Being less prescriptive about use of the funds in order to respect the autonomy and local knowledge of the Nation and their unique needs (e.g., not requiring evidence of competitive procurement of all service providers)</li> </ul> </li> </ul> <p>To address this, we recommend considering, adopting a funding stream specifically for indigenous community projects and where partners are involved contributions for the consultation process established by the community.</p> |

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| <p>What type(s) of support from the IESO would facilitate new clean electricity project development?</p> | <p>Capacity funding for Indigenous partners:</p> <ul style="list-style-type: none"> <li>• When initiating a partnership, capacity funding enables Indigenous communities to provide valuable input into pre-development activities (e.g. for legal advice, leading/participating in environmental and traditional use studies etc.)</li> <li>• Opportunity to explore dedicated funding for capacity funding in the pre-development phase, including funds that are issued retroactively for costs already incurred in the first interactions, set of meetings and initial due diligence with non-indigenous developers prior to having enough information or certainty to submit a capacity funding application.</li> <li>• Funding for Indigenous peer-to-peer mentorship and training:</li> <li>• Opportunity to explore funding for organizations that are supporting training that connects renewable energy champions and provides mentorship and training opportunities, supporting capacity building across communities e.g.: <a href="#">Indigenous Clean Energy</a></li> <li>• Opportunity to retain green energy credits to be utilized as the community sees fit</li> </ul> <p>Under the Community Support Stream:</p> <ul style="list-style-type: none"> <li>• Funding for an appropriate organization, within a First Nation community, such as our consultation team to host learning opportunities (webinar series, conference etc.) for indigenous staff to consider forward looking ideas on renewable energy siting (i.e. how renewables fit with Official Community Plan, safety considerations etc.)</li> </ul> |

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| Do you have any projects under development that would benefit from the FCEF support? | Yes. If existing retro of an existing station, to become more energy sufficient is considered, then we would like to consider use of an existing dam upstream of the Twin Falls Station. This would mean a transfer from the province of an old logging dam to the community to use to hold back the surplus water during the spring, resulting in a consistent flow through the turbines though out the summer dry periods, and a substantial increase in energy generation. |

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| <p>Are there any additional potential funding streams the IESO should consider?</p> | <p><b>Indigenous Green Credits</b><br/> Where a generation facility is owned by an indigenous owner, the funds under the Future Clean Energy Fund should be set aside separately for use by the Indigenous facility owners for reinvestment in their generation facilities or for development of new generation facilities within their indigenous lands, or offered to the Indigenous communities for use as they see fit.</p> <p><b>Remote Costs Fund</b><br/> A remote funding stream_would be also beneficial, as the majority of Indigenous energy is or will be located in remote areas, incurring higher costs for transportation, labour and repairs. We have in the past had to access our hydro plant by helicopter due to road/weather conditions or leave the plant not operational for days.</p> <p><b>Water Rentals Fund</b><br/> Unique to waterpower is the fact that the industry pays “water rentals” to the provincial Consolidated Revenue Fund, averaging \$120 Million annually. These funds could be directed in two ways to support indigenous energy developments:<br/> Resource Revenue Sharing. Where a generation facility is owned by an indigenous owner, the water rentals should be set aside separately for use by the Indigenous facility owners for reinvestment in their generation facilities or for development of new generation facilities within their indigenous lands, or offered to the Indigenous communities for use as they see fit.<br/> Hydro development fund. The IESO and the government may wish to consider a dedicated waterpower projects fund that directs a portion of water rentals to priority Future Clean Electricity Fund streams.</p> |

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| Should any of the identified potential streams be recommended? Removed from consideration? If so, why? | We suggest that the Fund consider a base allotment to the "Indigenous Energy Projects" stream (i.e., a minimum that is not pooled with the funds from other streams), but not a maximum limit, to ensure that these funds are prioritized among the streams being considered. This minimum allotment should roll over year-over-year should it not be fully allocated in any given year. |

## General Comments/Feedback

Kagiano Power Corp is a 100 % owned indigenous generation plant, although we have partnerships with others we support the views of Innergex Renewable Energy on the Umbata Falls hydroelectric facility in northern Ontario (COD: 2008). Most importantly First Nation Communities need Time to respond to these various programs, we do not have the capacity to have individuals dedicated to certain projects. Running a First Nation Community is like running a Country meaning that we must be a part of every government initiative that drops onto our door step or risk being left behind looking like a third world county .