

Feedback Form

Long-Lead Time RFP – January 28, 2026

Feedback Provided by:

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Date: February 11, 2026

To promote transparency, feedback submitted will be posted on the Long Lead-Time RFP engagement page unless otherwise requested by the sender.

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NO - There is confidential information, do not post



YES - Comfortable to publish to the IESO web page

Following the January 28th Long Lead-Time RFP engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the [LLT RFP engagement webpage](#).

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials, please indicate if they are confidential.

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

Policy Considerations

Buy Local Policy Provisions

The IESO is seeking stakeholder feedback to understand:

1. Whether proponents were already planning to source at least 50% of goods, services and workforce related to the project locally (i.e., from Ontario/Canada)
 - a. For those Proponents that were not planning this, is it possible and what would the cost implications be?
2. An indication of Projects that would be unable to source at least 50% of goods, services and workforce locally regardless of cost implications

Are there any other considerations the IESO should be aware of?

Is there any additional feedback you would like to provide in response to the proposed local supply plan requirement currently under consideration?

LLT Design Considerations

Policy Considerations: Buy Local Policy Provisions

Requirements for Projects to Purchase Local and include Indigenous Partners and Indigenous Communities.

Zhaaboshkaatoon is a consortium of the Williams Treaty Communities working with Peterborough Utilities Incorporated to submit the Trent Severn Waterway dams to the IESO's Long Lead Time Energy Procurement (LLT Energy). Zhaaboshkaatoon appreciates the opportunity to provide comments on the January 28, 2026, engagement materials for the LLT Energy, in particular the proposed Local Supply Plan requirement and its alignment with Indigenous Community Participation.

1. Positioning First Nation Rights Holders within the "Local Supply Plan."

The current Local Supply Plan concept is framed around Ontario/Canadian content with a focus on domestic goods, services, and workforce, including a proposed requirement that Proponents attest to sourcing at least 50% of goods, services and workforce from domestic suppliers.

For Williams Treaties First Nations who are Indigenous Rights Holders, "local" must be defined first and foremost in relation to the Indigenous territories and communities in which these facilities will be sited, not solely as a provincial or national industrial policy objective.

We therefore recommend that the Local Supply Plan be explicitly expanded to require:

1. A distinct "Indigenous Procurement and Participation" section, separate from general Ontario/Canada content, which demonstrates how the Proponent will prioritize procurement of goods, services and workforce from First Nation rights-holder communities and Indigenous-owned enterprises whose rights, lands and territories are directly engaged by the project.
2. A requirement for Proponents to quantify planned expenditures with Indigenous-owned or Indigenous-controlled businesses (including equity partners, joint-venture entities and project-specific SPVs) as a percentage of total project costs, and to provide a rationale where this cannot be achieved.
3. A requirement for Proponents to describe how they will support Indigenous workforce development (training, apprenticeships, preferential hiring, career progression) within the rights-holder communities associated with the project's location.

This approach would better align the Local Supply Plan with the Indigenous Community Participation policy intent, which already recognizes projects sited on Indigenous lands or within treaty areas, established or asserted traditional territories or homelands where Indigenous communities hold at least a 10% economic interest.

2. Aligning Local Supply Plan with Indigenous Community Participation (Rated Criteria)

We support the continued use of rated criteria to incentivize Indigenous Community Participation, including Local Indigenous Community Participation. However, there is a missed opportunity if the Local Supply Plan remains a parallel or purely generic “Buy Ontario” exercise rather than being structurally linked to the Indigenous participation framework.

We recommend that:

1. Points (or equivalent rated criteria) will be awarded where the Local Supply Plan demonstrates that a material share of domestic procurement and labour is intentionally channelled through the participating Indigenous communities and their businesses, not just "somewhere in Ontario."
2. The Evidence of Indigenous Community Participation prescribed form should be updated to include a summary table of:
 - a. anticipated Indigenous equity interest; and
 - b. anticipated Indigenous procurement and labour percentages as committed in the Local Supply Plan.
3. The minimum 10% Indigenous economic interest threshold for Local Indigenous Community Participation should be complemented, not substituted, by Local Supply Plan commitments related to Indigenous procurement and labour; in other words, equity, procurement and labour should be treated as mutually reinforcing pillars.

This would ensure that “local” content is not satisfied solely by non-Indigenous suppliers located elsewhere in Ontario while projects physically occupy Indigenous homelands and treaty territories.

3. Treating First Nations as Strategic Supply-Chain Partners, Not Just Stakeholders

The materials acknowledge stakeholder feedback that only 20–50% of capital expenditures may be realistically sourced from Ontario/Canada, with labour and consulting generally domestic, while major mechanical and insulation equipment is often imported and may come at a premium. Within that constrained Ontario/Canada portion, First Nations are ideally positioned to become strategic partners rather than residual beneficiaries.

We recommend that the IESO:

1. Explicitly recognize Indigenous Rights-holder owned entities as preferred domestic suppliers in the Local Supply Plan framework, where they can competitively provide services such as site preparation, civil works, construction, operations and maintenance, environmental and cultural assessments, monitoring, logistics, and professional services.
2. Encourage Proponents, through guidance and rated criteria, to structure local supply chains so that Indigenous partners are embedded across the full project lifecycle

(development, construction, operations and decommissioning), not limited to early-stage engagement or land-related payments.

Clear recognition of Indigenous-owned entities as priority domestic suppliers would operationalize the LLT RFP's policy intent around Indigenous Community Participation and move beyond a compliance model towards co-development.

4. Reporting Requirements and Transparency

Under the current proposal, Suppliers would annually report on progress against their Local Supply Plan, with initial plans and progress reports shared with the Ministry of Energy and Mines until Commercial Operation.

We recommend that:

1. Local Supply Plan reporting will be disaggregated to show: (i) total Ontario/Canada content, and (ii) First Nation/Indigenous-specific procurement and labour outcomes (by community and by Indigenous-owned supplier where feasible).
2. The IESO and the Ministry establish a process to share, regularly and in an accessible format, aggregated Local Supply Plan performance data with affected Indigenous communities and rights holders, so that we can monitor whether commitments are being met and adjust our own economic development strategies accordingly.
3. Proponents are required to co-develop Local Supply Plan updates with participating Indigenous communities where the project is sited on Indigenous lands or within their treaty area or traditional territory, with any material changes discussed and agreed before being submitted.

These measures would transform the Local Supply Plan into a practical tool for tracking whether the LLT RFP is delivering meaningful Indigenous economic outcomes tied to project locations.

5. Specific Text and Guidance Suggestions

Without prejudging final drafting, we suggest that the IESO consider:

1. Adding to the Local Supply Plan description a requirement that Proponents “identify, quantify and prioritize procurement and workforce opportunities for Indigenous communities whose Indigenous Lands, treaty areas, or established or asserted traditional territories or homelands are engaged by the project, and describe how these opportunities align with the Proponent’s Indigenous partnership arrangements.”
2. Updating related guidance documents and prescribed forms to provide examples of eligible Indigenous procurement categories and to clarify how Indigenous procurement and workforce commitments will be assessed alongside broader Ontario/Canada content.

These changes would provide clarity to Proponents, reduce transactional uncertainty, and ensure that Indigenous procurement is planned early, rather than being an afterthought once major contracts are already awarded.

Zhaaboshkaatoon and its shareholder First Nations communities stand ready to work with the IESO, the Ministry of Energy and Mines, and prospective Proponents to co-design practical approaches that integrate Local Supply Plans with Indigenous Community Participation in a way that honours treaty relationships and advances long-term Indigenous economic development in our territories. We strongly urge the IESO to Pilot the process using the LLT Energy round, and then also apply it to LT2-e2.

Please contact us if we can provide further support. Thank you for your kind consideration of this deputation.

Kind regards,

Patrick
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