

Recommended Feedback (due August 9 2024):

<https://ieso.ca/-/media/Files/IESO/Document-Library/engage/tsf/TSF-20240725-Feedback-Form.docx>

Partial Contracting Evaluation:

Does the proposed "Partial Contracting Approach" sufficiently:

- **Safeguard ratepayers against project risks?**
Additional mechanisms are necessary to mitigate risks related to post-construction costs, particularly those that may arise from operational and maintenance activities. There is a potential risk of unforeseen expenses being passed on to ratepayers, and these should be carefully managed through robust oversight by both the IESO and the OEB.
 - **Promote competition?**
While the Partial Contracting Approach may encourage competition during the selection process, there could be concern that it might not fully level the playing field for new entrants, particularly those proposing innovative but higher-risk solutions. Ensuring transparency and fairness in the evaluation process is crucial to foster genuine competition. This includes clear guidelines and criteria that are consistently applied across all proposals.
 - **Promote Indigenous Participation?**
The proposed approach makes some strides in promoting Indigenous participation, particularly through the requirement for Indigenous Participation Plans (IPPs). However, the framework should include more explicit requirements for long-term partnerships and benefits for Indigenous communities, not just during the development phase but throughout the operational life of the project. Indigenous participation should be more than symbolic; it should translate into substantial and sustained economic and capacity-building opportunities.
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Qualified Transmitter Registry:

Does a flexible application submission window for a qualified transmitter registry meet developers' or stakeholders' needs?

Recognizing the value of a flexible submission window, particularly for ensuring that a diverse range of transmitters can qualify. However, it is essential that this flexibility does not come at the expense of thorough vetting, particularly concerning the transmitters' experience with Indigenous engagement and their ability to deliver on Indigenous participation commitments. The IESO should include specific checkpoints or deadlines within the flexible window to ensure that all applicants are consistently held to the same high standards.

Evaluation Criteria Review:

Has the IESO captured all necessary evaluation guiding principles and criteria within an expected transmission project proposal?

Further refinement is needed in the following areas:

- **Indigenous Engagement:** Criteria should more explicitly require proof of successful, long-term Indigenous partnerships in previous projects. This could include documented outcomes from past projects and letters of support from Indigenous communities.
 - **Economic Participation:** The criteria should emphasize not just the scale but also the quality and sustainability of economic opportunities provided to Indigenous communities, including long-term equity participation, job creation, and capacity-building initiatives.
 - **Cultural Sensitivity:** Evaluation should consider a proponent's ability to incorporate cultural and environmental considerations that are important to Indigenous communities.
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Indigenous Participation Criteria:

What criteria should be considered to assess a proponent's experience with Indigenous participation and partnerships?

Recommend the following criteria to assess proponents:

- **Track Record:** Demonstrated history of successful, long-term partnerships with Indigenous communities, including specific examples of how these partnerships have been mutually beneficial.
 - **Cultural Competency:** Proponents should show evidence of their understanding and respect for Indigenous cultures, traditions, and land rights, as well as how these have been integrated into past projects.
 - **Capacity Building:** Clear examples of how the proponent has contributed to capacity building within Indigenous communities, including training programs, job creation, and support for Indigenous-owned businesses.
 - **Economic Benefits:** Detailed descriptions of how the proponent has provided or plans to provide substantial, ongoing economic benefits to Indigenous communities, beyond the initial project phase.
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General Comments/Feedback:

Urge the IESO to ensure that the TSF not only facilitates participation but also empowers Indigenous communities with meaningful, long-term roles in transmission projects. This includes ensuring that Indigenous communities are not

merely consulted but are active partners throughout the entire project lifecycle, from planning and construction to operation and maintenance.

Encourage the IESO to continue refining the TSF with an emphasis on transparency, fairness, and the recognition of Indigenous rights and interests. This will not only benefit Indigenous communities but also contribute to the broader goal of developing a more inclusive and equitable energy infrastructure in Ontario.