

Feedback Form

Toronto Third Line – June 25, 2026

Feedback Provided by:

Name: Don Richardson

Title: MSIFN Consultation

Organization: Mississaugas of Scugog Island First Nation (MSIFN)

Email: [REDACTED]

Date: July 16, 2026

To promote transparency, feedback submitted will be posted on the [Toronto Third Line](#) engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
☒ **No – comfortable to publish to the IESO web page**

Following the Toronto Third Line June 25, 2026, 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 [Toronto Third Line 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 July 16, 2026.

Please respond only to the questions that are relevant to your organization, expertise, or interest. There is no expectation to answer every question.

The Mississaugas of Scugog Island First Nation (MSIFN) appreciates the opportunity to provide further comments on the Toronto Third Line (TTL) procurement. MSIFN has been actively engaged across the related Toronto Regional Planning, South and Central Bulk Planning, GTA East, Transmitter Selection Framework, and Ministry of Energy and Mines processes because the TTL is not an isolated procurement. It is part of a broader build-out of major transmission infrastructure across the Lake Ontario Energy Corridor and within areas of direct importance to MSIFN's rights, responsibilities, economic interests, and long-term energy strategy.

MSIFN understands that the TTL is expected to be a first-of-its-kind underwater HVDC transmission project in Ontario, connecting the Bowmanville area to Toronto, and that the IESO is developing a project-specific procurement approach that draws from the Transmitter Selection Framework while accounting for the project's unique technical and commercial risks. The January 2026 IESO engagement summary identified the project as a 900 MW underwater HVDC line, with an in-service target of 2037, and noted that the procurement will involve a hybrid commercial model, eligibility requirements, Indigenous engagement expectations, and an Indigenous Engagement and Participation Plan as a rated component of proposals.

Question 1 - Indigenous Project Experience Requirements

If Indigenous project experience were required at the organizational level, what impact would this have on the procurement? (see June 25 presentation slides 35 & 36 for more details)

Question 2 - OEM Partnerships and Technical Capability Evidence

Should the IESO require additional evidence, either as mandatory or rated criteria, such as OEM partnership agreements or letters of support, evidence of past collaboration, and technical capability integration plans? (see June 25 presentation slide 34 for more details)

Question 3 - Canadian Content Rated Criteria

Regarding rated criteria for Canadian content, what materials should these provisions incent to be transformed and manufactured in Canada? What levels of Canadian content would be achievable and competitive? (see June 25 presentation slides 38 & 39 for more details)

Question 4 - Indigenous Participation Experience Evaluation

In relation to the rated criteria to recognize previous experience with Indigenous community participation, how should experience be evaluated? (see June 25 presentation slide 61 for more details)

Question 5 – Cost Categories and Cost Containment Mechanisms

Do you agree with the proposed cost categories and recommended cost containment mechanisms to scope certainty and risk control? (see June 25 presentation slides 46 to 55 for more details). For the additional cost categories on slide 56 (e.g., land acquisition, engagement, permitting, project overhead), what pricing and containment approaches would you recommend?

Question 6 – Cost Escalation and Indexation

What specific indices would you recommend be applied to the HVDC cable and converter station? Should pre-defined indices be applied to other cost items? If so, which cost items and which indices? (see June 25 presentation slide 54 for more details)

General Comments / RFP Draft #1 Feedback

Please use this section to provide any additional comments on the Toronto Third Line procurement, including feedback on Draft RFP #1 that may not be captured in the questions above.

1. Indigenous engagement experience must be real, organizational, and rights-based - not a paper qualification

MSIFN is concerned with the proposed flexibility that may allow a proponent to satisfy Indigenous engagement experience requirements through designated team members rather than through demonstrated organizational experience. Our review of the draft RFP indicates that the relevant requirement may allow a proponent to demonstrate experience either through organizational experience or designated team member experience, including a minimum of two qualified directors/officers, and that this flexibility could allow proponents without solid and meaningful Canadian First Nation rights-holder engagement experience to bid by hiring individual team members.

For a project of this scale, history, and sensitivity, First Nation rights-holder engagement experience should not be treated as a staffing checkbox. We recommend that the RFP require proponents to demonstrate a proven organizational track record of rights-based First Nation engagement and consultation on Canadian energy or linear infrastructure projects, with clear evidence that the organization has delivered commitments, managed long-term relationships, resourced First Nation participation, responded meaningfully to rights-based concerns, and where appropriate has engaged in providing meaningful procurement and investment opportunities. Individual team member experience may supplement that record, but it should not replace it.

The selected transmitter will be MSIFN's long-term counterpart over a project life that will extend well beyond procurement and construction. A proponent that lacks institutional experience working with rights-holding First Nations in Canada presents significant project risk, including delays, duplication, misaligned expectations, and ineffective consultation. MSIFN therefore recommends that

First Nation rights-holder engagement experience be a mandatory threshold requirement, not simply a rated or flexible criterion.

2. The IEPP must be enforceable, transparent, and tied to measurable commitments

MSIFN supports the inclusion of an Indigenous Engagement and Participation Plan, but the IEPP must be more than a high-level narrative. The January 2026 IESO engagement summary indicates that the IEPP is intended to be a mandatory, rated component of proposals, that it may become a contractual commitment, and that possible accountability mechanisms include publication of the successful proponent's IEPP, embedding commitments into project milestones and reporting, and penalties for non-performance that benefit impacted communities.

We recommend that the IESO strengthen the IEPP requirements by making the following elements mandatory:

- specific commitments to early, ongoing, and resourced engagement with rights-holding First Nations;
- a requirement to provide capacity funding for technical, legal, financial, environmental, archaeological, procurement, and commercial/investment review;
- clear milestones tied to procurement, investment, routing, design, permitting, construction, operations, and decommissioning;
- public and First Nation-specific reporting on implementation;
- a process for First Nation review of whether implementation is adequate;
- meaningful remedies where commitments are not met, including penalties or holdbacks that directly benefit impacted rights-holding communities; and
- Crown oversight of any delegated procedural consultation steps.

We have already raised concerns that consultation must be early, resourced, and ongoing, and that where procedural aspects of consultation are delegated, the Crown must monitor and enforce those commitments. The RFP should make that oversight explicit. The IESO should also clarify how IEPP commitments will be evaluated, scored, monitored, reported, and enforced over the full life of the project.

3. The Ministry's list of First Nation communities must be released early and used to structure engagement correctly

We note that the draft RFP requires proponents to engage with all First Nation communities specified in a "document to be provided by the Ministry," but that the document had not yet been released. This is a critical issue. The identity of rights-holding First Nations cannot be left unclear while proponents are preparing proposals, designing IEPPs, and initiating early engagement.

We recommend that the IESO and Ministry provide the community list as soon as possible and explain the basis on which the list was developed. The list should also distinguish between rights-holding First Nations, other Indigenous communities or organizations, municipalities, and general stakeholders. This distinction matters because section 35 consultation, rights impacts, economic reconciliation, and long-term partnership discussions cannot be treated as ordinary stakeholder engagement.

MSIFN also recommends that the RFP require proponents to engage through a coordinated First Nation process wherever rights-holding First Nations choose to organize collectively. MSIFN has previously requested a clear outline of roles and responsibilities among the Ministry, IESO, selected transmitter, and rights-holding First Nations, including a standing engagement table with the IESO, Ministry, and rights-holding First Nation communities.

4. The procurement must avoid creating a burdensome “proponent parade”

We have repeatedly flagged that multiple competing proponents can create an unmanageable burden on First Nation leadership and staff. We have noted that once the designation method is issued, the process could become “very messy” with multiple proponents, multiple meetings, and substantial work with proponents seeking First Nation engagement during the competition.

We recommend that the RFP include process rules to prevent duplicative, unmanaged, or extractive engagement by proponents. These rules should include:

- a requirement that proponents respect First Nation-established engagement protocols and points of contact;
- recognition that rights-holding First Nations may choose to coordinate collectively;
- capacity funding for First Nations to assess proponents and proposals;
- clear limits on repetitive introductory meetings that do not advance substantive issues;
- common information requirements so First Nations are not required to educate each proponent separately; and
- a requirement that proponents disclose how they will fund and support First Nation review during the procurement stage.

For MSIFN, this is both a capacity issue and a fairness issue. A procurement process that requires First Nations to repeatedly educate multiple bidders, without adequate funding or coordination, risks undermining the very Indigenous participation objectives the procurement is intended to advance.

5. Equity participation must be meaningful, early, and treated as a core project feature

We understand that Indigenous Equity Percentage is included in the rated criteria. MSIFN supports the inclusion of Indigenous equity, but a rated criterion alone is not sufficient. MSIFN has previously requested that 50% equity be treated as a minimum and has raised concern that equity triggered only when the line is energized prevents First Nations from participating early and reduces the leverage and benefits of a full-equity partnership.

The RFP should be structured to encourage, score, and ultimately require meaningful First Nation equity participation *at the earliest feasible stage*. This should include a pathway for rights-holding First Nations to bring or access capital earlier in the project lifecycle where doing so can reduce risk, improve alignment, and provide ratepayer benefits. MSIFN has also noted that there may be ratepayer benefits where First Nations bring capital early into a project.

We also recommend that the IESO clarify:

- how Indigenous equity percentage will be scored;
- whether equity must be offered to rights-holding First Nations specifically;

- whether equity participation can begin prior to energization or commercial operation;
- how the commercial model will accommodate First Nation capital participation;
- how First Nation equity will be treated under the hybrid IESO/OEB model; and
- whether regulatory changes or project-specific rules will be required to allow early and meaningful First Nation ownership.

Economic reconciliation cannot be reduced to a procurement scoring line. It must be embedded as a project design principle.

6. Supply chain disclosure should support authentic Indigenous procurement and local capacity

We recommend that the RFP require proponents to provide a detailed Indigenous procurement and supply chain plan that distinguishes between generic Indigenous procurement targets and procurement involving rights-holding First Nation businesses, partnerships, training pathways, and local economic development

The supply chain plan should include:

- specific opportunities for First Nation-owned businesses and joint ventures;
- transparent reporting on Indigenous procurement spend;
- safeguards against superficial or “paper” Indigenous participation;
- early identification of scopes suitable for First Nation participation, including construction, logistics, marine services, environmental monitoring, training, and operations support;
- commitments to workforce training and apprenticeships; and
- mechanisms for rights-holding First Nations to review procurement implementation.

The RFP should require proponents to demonstrate how supply chain commitments will be implemented, not simply described.

7. Routing, lakebed, marine archaeology, and cumulative effects must be addressed before decisions harden

MSIFN has consistently raised concerns regarding routing, cumulative effects, marine archaeology, marine ecosystem effects, treaty-protected harvesting rights, and the unceded lakebed. Cumulative effects, marine archaeology, marine ecosystem impacts, treaty-protected harvesting rights, and unceded lakebed are key TTL unresolved issues. Our prior Toronto Regional Planning comments also raised concerns regarding the preferred underwater HVDC line from Bowmanville to the Port Lands, including potential impacts on unceded lands under Lake Ontario.

We have requested involvement in routing, including a process to determine the preferred route together with Ontario, especially given MSIFN’s experience with marine archaeology and cumulative impact studies with respect to Lake Ontario and the lakebed. The RFP should therefore require proponents to demonstrate how they will work with rights-holding First Nations on route selection, marine studies, archaeological protocols, environmental assessments, cumulative effects, and mitigation commitments before major project decisions are effectively locked in.

The IESO should also clarify how the Toronto Third Line will be assessed alongside other IESO, Hydro One, OPG, and regional/bulk system projects in the same geography. We have previously emphasized that the TTL is connected to broader South and Central Bulk Planning and GTA East planning, including major reinforcements into Toronto and east of Toronto. A piecemeal approach will not adequately address cumulative impacts or cumulative opportunities.

8. MSIFN should have a role in transmitter selection because the selected transmitter becomes a long-term rights-facing partner

MSIFN has previously requested an opportunity to select the transmitter, noting that the successful proponent will be MSIFN's "dance partner" for the next 80 years. This is a central point. The transmitter is not simply a successful bidder; it becomes a long-term infrastructure owner/operator with ongoing relationships, obligations, and impacts.

We recommend that rights-holding First Nations be given a defined role in the evaluation of Indigenous engagement, IEPP, equity, procurement, routing, and long-term partnership components of proposals. This role could include confidential review of relevant proposal sections, participation in interviews, scoring input, or a First Nation advisory recommendation to the IESO. Without this role, the procurement risks selecting a proponent based on paper commitments that may not reflect the lived experience, priorities, or expectations of affected rights-holders.

9. IESO and the Ministry should respond to and disposition MSIFN's comments

We have previously requested that the Ministry and IESO explain how MSIFN's comments will be dispositioned and provide a response to MSIFN's submission. MSIFN repeats that request here. Given the number of related processes and overlapping submissions, MSIFN requests a consolidated response table identifying:

- which MSIFN comments have been accepted;
- which have been partially accepted;
- which have not been accepted;
- what changes have been or will be made to the RFP, IEPP, term sheet, engagement process, or commercial model; and
- where unresolved matters will be discussed next.

This is particularly important because MSIFN has provided comments across multiple related IESO processes, including Toronto Regional Planning, Eastern Ontario Bulk Planning, South and Central Bulk Planning, Transmitter Selection Framework, and GTA West.

10. Requested revisions and next steps

We respectfully request that the IESO:

1. require demonstrated organizational Indigenous engagement experience in Canada as a mandatory criterion;
2. clarify and strengthen IEPP scoring, reporting, enforcement, and remedies;
3. release the Ministry's First Nation community list and explain its basis;

4. recognize collective rights-holder engagement structures and First Nation-established engagement protocols;
5. provide procurement-stage capacity funding for First Nation review of proponents, RFP materials, IEPPs, technical studies, and commercial models;
6. embed meaningful First Nation equity participation as a core project feature, not only as a rated criterion;
7. clarify how early First Nation capital participation can be accommodated under the hybrid commercial model;
8. require detailed Indigenous procurement and supply chain disclosure, with emphasis on authentic rights-holder participation;
9. require early First Nation involvement in routing, marine archaeology, cumulative effects assessment, and environmental study design;
10. give rights-holding First Nations a defined role in evaluating Indigenous engagement, IEPP, equity, procurement, and partnership components of proposals; and
11. provide a written disposition of MSIFN's comments across the related Toronto Third Line, TSF, GTA East, Toronto Regional Planning, and South and Central Bulk Planning processes.

We remain committed to working constructively with the IESO, the Ministry, and other rights-holding First Nations to ensure the Toronto Third Line proceeds in a manner that is technically sound, respectful of rights, protective of Lake Ontario, and aligned with meaningful economic reconciliation.

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Don Richardson

On behalf of MSIFN Consultation

Mississaugas of Scugog Island First Nation