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Comments from Mississaugas of Scugog Island First Nation (MSIFN)
IESO South Georgian Bay/Muskoka Region Scoping Assessment Outcome Report

November 18, 2025

Submitted to:
Independent Electricity System Operator (IESO) Engagement Team

Via email: engagement@ieso.ca

Re: Response to IESO South Georgian Bay/Muskoka Region Scoping Assessment Outcome Report

Dear IESO Engagement Team,

The Mississaugas of Scugog Island First Nation (MSIFN), as part of the Michi Saagiig Anishinaabeg and signatories to the Williams Treaties, appreciates the opportunity to provide comments on the South Georgian Bay/Muskoka Region Scoping Assessment Outcome Report. The planning area encompasses the traditional territories of the Michi Saagiig Anishinaabeg, covered by the Williams Treaties.

MSIFN has a vested interest in this plan due to its potential impacts on our treaty rights, unceded territories, cultural heritage, and economic reconciliation opportunities. Our comments are informed by our inherent responsibilities as stewards of these lands and waters, as well as previous engagements with energy sector entities such as Ontario Power Generation (OPG) and Hydro One. We draw on principles from the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and the Truth and Reconciliation Commission's Calls to Action.

Consultation and Engagement:

1. MSIFN seeks a government-to-government relationship, integration of Indigenous knowledge into project decision-making, impact assessment and follow-on project activities such as environmental monitoring, and a holistic approach to energy project activities affecting MSIFN and other Michi Saagiig Nations that ensure accountability and alignment with our intergenerational stewardship principles.
2. The Draft Terms of Reference for the South Georgian Bay/Muskoka Region IRRP references "Input from local communities, First Nation communities, and Metis Nation of Ontario", but lacks specifics. We would benefit from detailed planning with IESO representatives to structure and operationalize enhanced consultation processes.
3. We note that there is currently no Indigenous representation on the Technical Working Group.

Economic Reconciliation:

1. The Michi Saagiig Nations assert their right to share in the economic benefits derived from the development of their traditional lands and waters, including the upgrading and expanding of energy infrastructure that supports continued growth. This calls for meaningful participation in decision-making and economic opportunities. MSIFN strongly supports authentic Indigenous participation and exploring Indigenous partnerships in the South Georgian Bay/Muskoka Region IRRP. This aligns with the IESO's and Ontario's reconciliation goals.
2. Hydro One's industry-leading model offers First Nations 50% equity in new large-scale transmission lines (>\$100M), as proven in Waasigan (\$1.2B), St. Clair, and Chatham–Lakeshore. We recommend:
 - Adapting this model to any **new transmission, transmission refurbishments, intertie reinforcements, new transmission stations or transmission sub-stations**.
 - Exploring majority First Nation ownership with MSIFN and other Michi Saagiig Nations as priority partners.
 - Leveraging federal funding programs to enhance ratepayer benefits.
3. Equity and revenue-sharing opportunities should extend to:
 - Station Capacity upgrades (e.g., Everett TS, Alliston TS, Mindhurst TS, and Wallace TS)
 - Transmission line upgrades (e.g. M6E/M7E)
 - Distributed Energy Resources (DERs) and battery storage procurements in the region
 - Energy efficiency programs targeting First Nation-owned enterprises
4. MSIFN is investing in battery storage, renewable natural gas (RNG), and renewable energy generation. The South Georgian Bay/Muskoka Region IRRP should prioritize decarbonization pathways.

Next Steps:

MSIFN requests:

1. A government-to-government consultation framework
2. Integration of Michi Saagiig knowledge keepers in route selection, impact assessments, and monitoring
3. Early engagement with the Technical Working Group
4. Early review of the draft IRRP in Q3 2026
5. Schedule a bilateral meeting with IESO to discuss these comments

MSIFN is committed to collaborative, rights-respecting solutions that support reliable, clean energy while fostering prosperity. We look forward to your response and continued dialogue.

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MSIFN Consultation

Mississaugas of Scugog Island First Nation

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