

# Feedback Form

## Regional Electricity Planning in the Sudbury/Algoma Area – December 18, 2025

### Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the Sudbury/Algoma [engagement webpage](#) unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback on the scoping assessment report. A copy of the report and a recording of the webinar can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by January 12, 2026.**

Topic	Feedback
What additional information should be considered as part of the Scoping Assessment?	Whitefish River First Nation recommends that the Scoping Assessment incorporate community-level and Indigenous-led planning inputs alongside technical load forecasts, including: Indigenous community growth projections, including housing expansion, electrification of heating,

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	<p>community facilities, and future economic development zones that may not yet be fully reflected in municipal or LDC forecasts. Cumulative corridor impacts, particularly where multiple transmission, distribution, and bulk system assets intersect Indigenous territories over the 20-year planning horizon. Local resilience and reliability data, including outage history, restoration times, and voltage performance experienced by Indigenous communities served by radial or constrained systems. Indigenous-led energy priorities, including opportunities for demand-side management, distributed energy resources, storage, and community-scale generation that could function as non-wires alternatives or complementary solutions. Land use, environmental, and cultural considerations, including traditional land use areas and sensitive sites that should inform early screening of options rather than being addressed late in project development. Including this information early will strengthen the Integrated Regional Resource Plan (IRRP) and reduce downstream risk, delays, and conflicts.</p>
<p>What additional considerations, informed by local developments, should be taken into account for the areas identified as requiring further analysis?</p>	<p>For areas identified as requiring further regional coordination—particularly Martindale TS capacity constraints and Manitoulin TS voltage concerns—WRFN recommends the following considerations:</p> <ul style="list-style-type: none"> <li><b>Electrification acceleration risk:</b> Load forecasts should explicitly test higher-than-expected electrification scenarios in Indigenous and rural communities, including space heating, transportation, and small-scale industry.</li> <li><b>Non-wires alternatives (NWAs):</b> Battery energy storage systems (BESS), targeted conservation programs, voltage support solutions, and Indigenous-owned distributed generation should be evaluated alongside traditional wire solutions.</li> <li><b>Indigenous economic participation:</b> Planning should examine opportunities for Indigenous equity participation, long-term service roles, and capacity building related to both wire and non-wire solutions.</li> <li><b>Operational flexibility and resilience:</b> Solutions should prioritize flexibility under extreme weather, outages, or upstream bulk system constraints, particularly for communities currently experiencing voltage sensitivity or limited redundancy.</li> <li><b>Sequencing and timing transparency:</b> Communities should be informed early about when needs are expected to</li> </ul>

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	<p>materialize (e.g., 2030–2034 horizons identified in the Needs Assessment) to allow proactive planning and readiness. WRFN is aware of past instances where proponents have secured Indigenous participation agreements with communities located well outside the immediate project area (approximately 100 km away), while First Nations whose territories were directly affected by the project were not participating. This approach presents risks related to territorial relevance, identification of rights-holders, and the integrity of consultation and engagement processes.</p>
What other areas or specific considerations should be examined through regional planning?	<p>WRFN encourages the IRRP to also examine: Regional energy sovereignty and governance models, including how Indigenous communities can play an ongoing role in corridor stewardship, monitoring, and decision-making. Training and workforce development, ensuring regional planning aligns with opportunities to train Indigenous technicians, operators, environmental monitors, and energy planners. Integrated land-use and infrastructure planning, recognizing that transmission corridors often overlap with roads, fibre, pipelines, and future infrastructure. Climate adaptation planning, including how extreme winter conditions, ice storms, and heat events may affect both demand and infrastructure performance over the planning horizon. Early engagement protocols, ensuring Indigenous Nations are engaged as planning partners during option development—not only during project-specific approvals.</p>

## General Comments/Feedback

Whitefish River First Nation supports the recommendation to proceed with an Integrated Regional Resource Plan (IRR) for the Sudbury/Algoma region. The identified needs—particularly station capacity constraints and voltage performance issues—underscore the importance of integrated, forward-looking planning that considers technical, social, environmental, and economic dimensions together. WRFN emphasizes that meaningful Indigenous participation at the IRR stage will: Improve solution quality and durability Reduce long-term project risk Support reconciliation through practical, outcomes-based collaboration We look forward to continued engagement with the IESO and regional partners throughout the IRR process.