BINGWI NEYAASHI ANISHINAABEK

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May 14, 2023

SUBJECT: Environmental Registry Posting - IESO Pathways to Decarbonization Study
ERO 019-6647

Thank you for the opportunity to provide input and advice on the Environmental Registry posting regarding the IESO's Pathways to Decarbonization Report (P2D). Bingwi Neyaashi Anishinaabek (BNA – Sand Point First Nation) is located on the southeast shores of Lake Nipigon, and is in the process of developing its community from scratch after decades of displacement. BNA has a partnership in place with our neighbouring First Nations on a hydroelectric project located on the Namewaminikan River system north of our community. This partnership is bringing in revenues to our First Nation which is helping us in our developments. We also have worked with Ontario Power Generation (OPG) in the past in looking at the development of the Little Jackfish River Hydroelectric Project. BNA is very interested in partnering in sustainable hydroelectric development, like the Little Jackfish Project: for the employment that it would bring to our people, the businesses that could be developed to support its construction, and the revenues that would come to our community, allowing us to develop and grow. As such, we are pleased to see specific reference in the posting to Ontario Power Generation's "Northern Ontario Hydroelectric Opportunities" Report (NOHO). In my view, taken together, these reports and the government's policy response can and should provide the basis for strategic and sustained investment in realizing the province's waterpower potential in the immediate, near and long term.

Our comments on the posting are as follows:

1. Realizing the potential of new hydroelectric generation in Ontario.

BNA supports the development of new hydroelectric generation in Ontario by private, Indigenous, municipal and government-owned developers as well as partnerships between the range of owners. BNA believes that our First Nation, along with our neighbouring communities, should be leading the development of these projects.

Importantly, new investment in "Made in Ontario" hydroelectricity – already the backbone of system reliability – is investment that stays in communities, regions and the province.

2. Recognizing the imperative of Indigenous and Community participation.

It is our First Nation's expectation that, particularly for new northern hydro development, Indigenous communities will be proponents of, or partners in, projects. While "early" engagement is certainly expected, as important is "ongoing" engagement as a project moves from a high-level concept to the planning and potential development stages.

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Hydroelectric development can create lasting economic and social benefits to Indigenous communities and enable other significant regional economic benefits. Though every community has unique needs and perspectives on specific projects, BNA is supportive of hydroelectric development, provided it is done responsibly, there is meaningful, early participation, and that the community benefits economically.

3. Beginning work now on planning and siting for new waterpower facilities.

We strongly agree with the P2D recommendations that "Sector partners should begin planning and siting work to identify potential new hydroelectric projects", and "Preliminary work should begin now so that options are available for the future." In addition to early engagement, per above, this will require policy alignment and capacity across provincial government agencies with regulatory responsibilities relevant to predevelopment, environmental assessment and permitting. In the case of hydroelectricity, the Ministries of Natural Resources and Forestry and the Ministry of Environment and Parks are of particular importance. Similarly, procurement mechanisms from the IESO must be designed to support long lead-time, and long lifespan assets.

4. Taking a planned and measured approach to reduce costs.

Experience suggests that a planned and predictable cadenced approach to predevelopment, procurement and permitting that begins now and is implemented over a period of a decade or more will best ensure a cost-effective build out of hydroelectric resources. Ontario has experienced the "boom and bust" approach and witnessed its negative effects on prices and on the loss of expertise and skills in the system. There is a need now to re-establish and sustain the capacity of the industry, partners and communities to reduce costs over time.

Again, thank you for the opportunity to comment.

Sincerely,

Chief Paul Gladu
Bingwi Neyaashi Anishinaabek