BIIGTIGONG
NISHNAABEG

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). By way of introduction Biigtigong Nishnaabeg, owners of Kagiano/Twin Falls planton the Kagiano River, major partner of the Umbatta Falls plant on the White River, and benefactor to the Wawatay Plant on the Black River. As well as other potential hydroelectric opportunities within our traditional territory. As such, we are pleased to see a specific reference in the posting to Ontario Power Generation's "Northern Ontario Hydroelectric Opportunities" Report (NOHO). In our 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.

Biigtigong Nishnaabeg, 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. This range and diversity of ownership is already the case for Ontario's 224 existing hydroelectric facilities and is a core strength of the industry in the province. Ontario's heritage hydroelectric fleet moderates electricity prices today and the planned and predictable addition of new hydro (expansions, upgrades, retrofits and greenfield) will have the same effect for decades to come.

Importantly, new investment in "Made in Ontario" hydroelectricity – already the backbone of system reliability – is investment that stays in communities, regions, and the province. An estimated seventy-five percent (75%) of investment in new hydro and ninety percent (90%) of investment in sustaining existing assets remains in Ontario.

2. Recognizing the imperative of Indigenous and Community participation.

It is our expectation that, particularly for new northern hydro development, Indigenous and other communities will be proponents of or partners in new hydroelectric 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. It is insufficient to limit engagement to only the early stages of a potential project.

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, the public and communities are generally supportive of hydroelectric development, provided it is done responsibly, there is meaningful, early participation, and community benefits that further

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economic and social progress.

3. Beginning work now on planning and sitting for new waterpower facilities.
Based on our experience, 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. This engagement can only happen with provincial agencies working hand in hand with indigenous communities within their traditional territories, keep in mind the indigenous peoples have always been stewards of the land and water. Similarly, procurement mechanisms from the IESO must be designed to support long lead-time, long lifespan assets and, recognition of the socio economic factors to the indigenous communities.

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 Duncan Michano
Biigtigong Nishnaabeg &
Director Begetekong Power Cor