Taykwa Tagamou Nation

RR#2, Box 3310
Cochrane, Ontario
P0L 1C0

Telephone: (705) 272-5766
Fax: (705) 272-5785
www.taykwatagamounation.com

Sunday, May 14, 2023

SUBJECT: Response to Environmental Registry Posting - IESO Pathways to Decarbonization Study

ERO 019-6647

Thank you for the opportunity to provide initial advice and input on the Environmental Registry posting regarding the IESO's Pathways to Decarbonization Report (P2D). By way of introduction Taykwa Tagamou Nation is a progressive Cree community and are the original signatories to Treaty Nine and landholders within the Moose River/Abitibi/Mattagami water basins.

We have reviewed Ontario Power Generation's "Northern Ontario Hydroelectric Opportunities" Report (NOHO) and the IESO Pathways to Decarbonization Study to ensure that we are kept fully informed on plans for development within Our Territory. In my view, taken together, these reports and the government's policy response further confirm that our region's territory can provide Ontario and its ratepayers clean and sustainable power and should provide the basis for strategic and sustained investment in realizing the province's waterpower potential for the immediate, near and long-term future.

Our comments on the posting are as follows:

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

Taykwa Tagamou Nation supports the development of new hydroelectric generation in Ontario, and specifically in the Moose River/Abitibi/Mattagami Basins through First Nation led direction, development, and ownership where we would invite trusted technical and financial experts to work alongside our project. By leading the process from the onset, First Nations will provide critical information of environment impacts and develop the mitigation methods that are approved by the community, therefore, creating the ability to streamline the consultation process,

New investment in "Made in Ontario" hydroelectricity under full oversight from the First Nation communities will be investment that stays in our communities, along with the 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.

Where the current conversations of large Proponents are now moving into stating, "Indigenous communities will be proponents of or partners in projects," The incumbent companies and organizations have yet again failed to ask First Nation communities, "what does partnership mean to you?" Or "how does partnership look to you?" and then follow-up with true partnership. It is our community's intent to lead and develop hydro-electric opportunities on Our Traditional Territory through the same mindset of the treaty signing. We wish to share in the resources and benefits as true 50/50 equity partners with the project developers and financiers. We strongly

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agree that the process must be led by the First Nations. If the process is led by the First Nations, there will be no requirement for "early" engagement or "ongoing" engagement as the First Nations will create and lead the table for consultation, themselves. In this way there is no chance of First Nations being consulted as an afterthought.

We are supportive of hydroelectric development that will create lasting economic and social benefits to our communities, neighbouring townships, and the region. These projects provide additional significant regional economic benefits through local jobs/careers, support services and contracting opportunities. 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, and provides community benefits that further economic and social progress.

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

Based on our experience and understanding that we are busy Nations with many roles and responsibilities, we agree with the P2D recommendations that "… partners should begin planning and siting work to identify potential new hydroelectric projects" and further highly recommend that the only way forward is by the First Nations leading the process. This will require capacity funding to the Nations to kick-start the process. The First Nations will work towards policy alignment in partnership with 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, long lifespan assets.

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

To ensure that any development occurs efficiently, we agree 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. This will also allow us to build the First Nation capacity to participate over the long run.

Again, thank you for the opportunity to comment.

Sincerely,

Chief Bruce Archibald, Taykwa Tagamou Nation