



Red Jar Energy Partners
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Memorandum

Privileged & Confidential

TO: Ministry of Energy and Mines

FROM: Red Jar Energy Partners

DATE: February 20, 2026

SUBJECT: Re: Advancing Critical Transmission Expansion in the Toronto Area (ERO 026-0019)

Red Jar Energy Partners (“RJEP”) appreciates the opportunity to provide comments in response to **ERO 026-0019** regarding advancing critical transmission expansion in the Toronto area.

RJEP supports the Province’s decision to advance the Toronto Third Line transmission project through a competitive procurement process. Given accelerating load growth in the Greater Toronto Area, timely and coordinated transmission investment is essential to maintaining reliability, enabling electrification, and supporting sustained economic development.

RJEP commends the Province for advancing this forward-looking transmission expansion plan, and recognizes the unique technical, environmental, and regulatory considerations associated with underwater transmission infrastructure.

About Red Jar Energy Partners

Red Jar Energy Partners is a Canadian energy development firm specializing in innovative, large-scale power infrastructure. Established in 2021, RJEP was founded by the former leadership team of Spark Power, one of Canada’s largest independent electrical and power services companies, which they founded, grew, and successfully sold in 2023.

RJEP focuses on developing strategic energy infrastructure projects that enable economic growth, grid reliability, and long-term community benefit. RJEP brings deep expertise in project development, construction execution, and structuring meaningful Indigenous partnerships.



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RJEP's feedback on this proposal is informed by this experience and by our mandate to deliver impactful, and timely energy infrastructure that strengthens Ontario's electricity system and supports long-term economic growth.

RJEP offers the following formal feedback regarding the proposed directive to the Independent Electricity System Operator ("IESO") and the associated design of the Transmitter Selection Framework ("TSF"). These considerations for the final Directive are intended to support effective implementation of the Toronto Third Line project and to enhance long-term system value.

a) Importance of Transmitter Experience:

RJEP recommends that the Province ensure that the successful proponent has experience in the development and operation of underwater DC transmission infrastructure. In addition, it is important that the proponents have continuing key supply chain relationships, as these will be critical to meeting the quality and timeframe requirements that this project will demand.

b) Evaluation Criteria for Transmitter Selection

RJEP supports that transmitter eligibility requirements should be based around the technical demands of the project. We commend the Province for proposing criteria that promote transparency, competition and cost-effective investment in new transmission infrastructure.

Given the complexity, scale, and uniqueness of underwater transmission infrastructure, RJEP emphasizes that the selected transmitter must demonstrate proven and directly relevant experience in designing, constructing, delivering and operating comparable underwater transmission projects.

c) Consultation with Indigenous Communities:

RJEP recognizes that Indigenous communities are best positioned to determine how they wish to participate in major infrastructure initiatives affecting their territories. RJEP offers the following comments respectfully and in support of a clear and transparent procurement framework.

To further support transparency, it would be beneficial for the Province to provide additional guidance on how Indigenous participation and partnership commitments will be evaluated within the competitive process.

RJEP offers the following considerations:

i. Priority Equity Participation Consideration for Treaty Rights Holders



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RJEP believes that priority equity participation should be extended to First Nations with established Treaty Rights within the project area. Treaty Holder First Nations should be offered meaningful and substantive ownership opportunities in recognition of their relationship to the lands and waters involved. Transmission assets generate long-term, stable returns and represent a significant opportunity for sustained economic participation and reconciliation and intergenerational wealth creation.

RJEP recognizes that First Nation beyond those with Treaty Rights have the right to engagement and consultation. RJEP suggests that although Treaty Holders should have priority access to equity participation, it would be appropriate to extend the opportunity to participate in procurement, supply chain and other forms of economic participation. In addition, all First Nations with historical ties to the land will be consulted with respect to environmental, heritage and archaeological impacts.

While Treaty Rights holders should receive priority consideration for equity participation, this approach ensures that economic benefits extend beyond ownership and support inclusive engagement.

ii. Demonstrated Indigenous Partnership Experience

If the project proceeds through competitive procurement process, RJEP suggests that the evaluation framework should recognize proponents that demonstrate well-developed Indigenous partnership structures.

Specifically, the evaluation framework could recognize proponents that have existing formalized Indigenous equity partnerships in similar projects, and reward demonstrated success delivering large-scale energy infrastructure projects in partnership with First Nations in Ontario. Overall, the framework should assess the depth, structure and governance of proposed Indigenous participation.



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Next Steps

RJEP supports the Province's proposed direction. The effectiveness of the initiative will depend on well-designed eligibility requirements, clear Indigenous participation expectations, and flexibility to accommodate future system needs.

We appreciate the opportunity to provide input and would welcome further discussion regarding these comments.

Thank you,

Ron Dizy

Red Jar Energy Partners