

Long Lake #58 First Nation

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May 12, 2023

Via Email: MinisterEnergy@ontario.ca

Honourable Todd Smith, Minister of Energy

Ministry of Energy
10th Floor
77 Grenville Street
Toronto, Ontario M7A 2C1

Dear Mr. Smith,

RE: IESO Pathways to Decarbonization Study (ERO#019-6647)

I write on behalf of Long Lake #58 First Nation (“LLFN”) regarding the Independent Electricity System Operator (“IESO”) “Pathways to Decarbonization” (“P2D”) study. LLFN is pleased to provide the Ministry of Energy (the “Ministry”) with feedback on the findings of the P2D study as well as on the IESO’s “no-regret” recommendations.

LLFN appreciates the Ministry’s goal of eliminating greenhouse gas emissions from the grid and supports a moratorium on new natural gas generating stations in Ontario. We are pleased that the P2D study has determined that it is possible to manage Ontario’s energy transition with the necessary investments. The transition should occur as rapidly as possible *before* 2050 consistent with the federal government’s goal of achieving a national net-zero electricity grid by 2035. We expect you will continue to involve LLFN going forward as additional research and planning is done to move towards full decarbonization.

LLFN expects to be full partners in the transition to a decarbonized future. We welcome the IESO’s recognition that a partnership role for Indigenous communities is a necessity and that simply consulting Indigenous communities has never been a sufficient approach to electricity system planning. We note the IESO’s acknowledgement that an increased role for Indigenous governments beyond the current participation rate in electricity projects is essential. Furthermore, we appreciate the P2D study finding that Indigenous people must have a voice in how and where new infrastructure is located, and that meaningful and transparent discussions about land use is required. We note the study’s determination that the transition be managed in way that the resulting investment and increased costs do

not place undue burden on people with low incomes, a situation our people unfortunately often struggle against.

LLFN is currently involved in discussions with Ontario and Canada related to the negotiation of a self-government agreement. Those negotiations, and our future self-government system, are based on a co-management regime where each order of government participates in a collaborative process of shared decision-making with respect to land and resource use. We recognize energy siting can be disruptive to the natural environment and we insist upon shared decision making with proponents and the Crown with respect to the use of our lands. To be clear, LLFN consent would be required before any infrastructure was built on our lands. In response to the P2D study's recommendation to begin early work on planning and siting for new resources, LLFN would require shared decision-making process to be implemented during any phase of engagement related to siting located on our Traditional Territory. Furthermore, I want to confirm LLFN's position prohibiting nuclear power generation and radioactive waste storage on our Traditional Territory including, for greater certainty, small modular reactors ("LLFN Nuclear Policy").

With respect to the IESO's "no-regret" recommendation related to streamlining regulatory, approval and permitting processes, as always, we expect rigorous regulatory oversight and fulsome environmental assessment processes. As stewards of the environment for future generations we have a responsibility to vigorously advocate for and protect our lands. We believe in the sustainable development of our lands including development required for the energy transition. We will not, however, consent to shortcuts that threaten the integrity of the environment to achieve accelerated infrastructure buildouts.

LLFN supports making additional investment in clean energy resources in the short term to reduce the energy production of natural gas plants. We recognize this will increase costs to the electricity system and ratepayers. While we are concerned about potential cost impacts associated with the investments needed, we also know that the cost of not acting now will far surpass the estimated capital cost of \$375 billion to \$425 billion associated with acting sooner rather than later. We firmly believe that partnerships with Indigenous governments are an excellent way to reduce costs of new clean electricity infrastructure.

LLFN acknowledges the P2D study's finding that a zero-emissions grid by 2050 will require investment and innovation in hydrogen capacity to replace the flexibility currently provided by natural gas. LLFN supports the development and adoption of *low-carbon* hydrogen production in Ontario for use in electricity generation. We stress that any proposed carbon sequestration and storage in support of hydrogen production on our Traditional Territory would require LLFN consent. Nevertheless, the focus should be on developing low carbon hydrogen rather than steam methane reformation solutions. With respect to other low-carbon fuels, we wish to reiterate the LLFN Nuclear Policy.

New hydroelectric generation projects in Northern Ontario would be supported by LLFN provided they went through rigorous environmental regulatory approvals processes led by Indigenous stakeholders and they were Indigenous owned and operated with economic and social benefits provided directly to the communities impacted. LLFN would also like to see run-of-the-river scenarios contemplated. It must be emphasized that LLFN faces immense capacity issues with respect to natural resource and energy projects proposed on our lands. It behooves the Ministry to consider how it will adequately support us so that permitting processes move swiftly. Additionally, LLFN expects to be involved early, meaningfully and thoroughly in any acceleration of the Little Jackfish Project as well as those proposed near the Ring of Fire. The Ministry will note LLFN is geographically positioned as the “gateway” to the Ring of Fire.

LLFN supports the growth and development of wind and solar powered electricity on its Traditional Territory and is actively involved in developing a renewable energy project that will decrease the greenhouse gas emissions of a mine. We expect to see increased incentives for the development of wind and solar projects.

LLFN notes the P2D study finding that significant transmission capacity is required. LLFN is actively involved in various transmission related projects on its lands. To ensure transmission corridors can be built as quickly and cost effectively as possible LLFN recommends that the Minister, in conjunction with interested parties, develop a long-term strategy for new transmission deployment as well as transmission redevelopment in a manner that supports the P2D plan.

Finally, LLFN wants the open market concept added to support innovation in how the powering up phase will work. There is a need in Ontario for a more competitive and less regulated market that allows a generator, transmitter and customer to create opportunities that would be outside the rate regulated environment. If Ontario is going to meet its long-term electricity needs it must look at what works in other markets and it must apply those lessons learned to create new opportunities. While the rate-based market exists to protect certain consumers, you must recognize that it can be an impediment to market innovation.

Please do not hesitate to reach out if you have any questions.

Miigwetch,



Chief Judy Desmoulin

cc: Long Lake #58 First Nation Council Members
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