

DRAFT IESO Indigenous Conservation Programming Report

Comments from Ministry of Energy CRED & SNAP

Key Concern:

The October 26,2017 Directive asked that the IESO to prepare a report on options, which would be considered by the Minister of Energy.

- The report, as written, states that the IESO will implement all recommendations. This does not provide the Minister opportunity to consider the IESO's intent. Also, some of the recommendations will require government policy decisions/direction.

Specific instances of this are called out in the comments below.

Pg	Language from Report	Comments
	General comment	Could there be an explanation in the report on how available programming addresses electricity inefficiencies and broader energy use inefficiencies. Looking for a description on how our "energy conservation" efforts are working to address both aims
	Title Page – “Draft Report on Energy Conservation for Ontario’s First Nations and Métis”	The Ministry avoids saying “Ontario’s First Nations...” as it can be misconstrued as ownership-type language. SUGGESTED EDIT: “Draft Report on Energy Conservation for Ontario’s First Nations and Métis in Ontario ”
4	"In the coming months the IESO will be working to refine existing programs and develop new ones that will be better aligned with community identified needs, priorities, and objectives."	Some of the recommendations require policy decisions/direction from government. SUGGESTED EDIT: "In the coming months and over the longer-term the IESO will be working to refine existing programs and develop new ones that will be better aligned with community identified needs, priorities, and objectives."

Pg	Language from Report	Comments
5	“Reflected on feedback from First Nations communities gathered during engagements related to the <i>Long-Term Energy Plan</i>, as well as previous community meetings;” Bullet 3	LTEP engagements also included Métis sessions. Suggest adding in Métis. SUGGESTED EDIT: “Reflected on feedback from First Nations and Métis communities gathered during engagements related to the <i>Long-Term Energy Plan</i>, as well as previous community meetings;”
6	“Four regional meetings (Thunder Bay, Sudbury, London, Vaughn)”	CORRECTION: The IESO held 5 regional meetings, the one that is missing is Ottawa. Further, page 13 indicates that the IESO held seven regional and community meetings (5 regional and 2 community meetings).
6	“Based on these meetings, it became clear that for many First Nations people, energy conservation has implications that can be much broader than simply implementing an energy plan.”	Add in Métis: SUGGESTED EDIT: ““Based on these meetings, it became clear that for many First Nations and Métis people, energy conservation has implications that can be much broader than simply implementing an energy plan.”
7	"The IESO plans to implement the recommendations and will also continue to look to First Nations communities, Métis Councils and their representatives for input on how to improve energy conservation programming across the province."	Some of the recommendations require policy decisions/direction from government, and the recommendations require the Minister's consideration. SUGGESTED EDIT: "...The IESO is providing these recommendations to the Minister of Energy to signal our intent to plans to implement the recommendations and will also continue to look ..."
9	“While the credit reduces the cost of energy, participants in various engagements said that pursuing energy conservation initiatives still makes a difference, particularly for large non-residential buildings that are exempt from the First Nations Delivery Charge Credit”.	Suggest revising as follows given that the ministry is still in discussions with COO about band-owned buildings: SUGGESTED EDIT: “While the credit reduces the cost of energy electricity, participants in various engagements said that pursuing energy conservation initiatives still makes a difference, particularly for large non-residential buildings that are exempt from the First Nations Delivery Charge Credit”.
9	“For many First Nations people, conserving energy is not just about managing energy costs, taking advantage of energy efficient technology and mitigating the impacts of climate change.”	QUESTION/SUGGESTED EDIT: Were any Métis involved at regional meetings? Perhaps this wording could be changed to Indigenous?

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10	"Other participants in the engagement process said that notwithstanding the delivery charge exemption, energy is still expensive."	SUGGESTED EDIT: "Other participants in the engagement process said that notwithstanding the delivery charge exemption credit , energy is still expensive."
11	"Statistics Canada data provide a glimpse into the latent potential within Ontario's First Nations communities to tackle their energy efficiency challenges themselves,...".	SUGGESTED EDIT: "Statistics Canada data provides a glimpse into the latent potential within Ontario's First Nations communities in Ontario to tackle their energy efficiency challenges themselves,...". Also in this paragraph it may be appropriate to mention Métis as well since they are mentioned at the bottom of the page.
10/ 11	On energy affordability	There is no mention of Métis in this section. Might it be appropriate to include an overarching statement about understanding the need to develop and implement programs that work for all Indigenous peoples, regardless of the existence and/or eligibility to remove the delivery charge? Could mention the OESP program that is available to all Indigenous people, including Métis and Inuit.
12	n/a	QUESTION TO IESO: Were there any relevant statistics to include re: Métis?
12	"Over forty per cent of people living on-reserve lived in homes needing major repairs, compared to 14 per cent for off-reserve First Nations."	SUGGESTED EDIT: "Over forty per cent of people living on-reserve lived in homes needing major repairs, compared to 14 per cent for off-reserve First Nations people ."
13	"In preparing this report, seven regional and community meetings were conducted, in addition to the Indigenous Community Energy Symposium in Toronto in October 2017, and a public webinar in December 2017."	CORRECTION: Need to be consistent in the number of regional and community meetings (is it 4 or 5 regional sessions). QUESTION TO IESO: Could a link to the Indigenous Community Energy Symposium be provided (in the chapter or in the appendix) for additional context? In the same way, does the IESO have a web page where written submissions and summaries of what was heard through the regional and community meetings are posted?
14	"Ten First Nations communities are served by Independent Power Authorities."	SUGGESTED EDIT: "Ten First Nations communities are served by Independent Power Authorities, and are not currently eligible for province-wide conservation programs ."

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17	"In reviewing and developing programs that support Indigenous communities, participants encouraged the IESO to pay close attention to program start and stop dates. They said there is often insufficient time between receiving approval for funding and implementation deadlines to actually get the work done."	QUESTION TO IESO: Would it be of value here to make mention of the importance of climate/time of season and other seasonal issues or cultural activities like hunting?
23	"Going forward, the guiding principle will be to keep the energy efficiency conservation with Ontario's First Nations and Metis alive."	CORRECTION: "Going forward, the guiding principle will be to keep the energy efficiency conversation with Ontario's First Nations and Metis alive."
23	"The IESO will implement the following action plan"	SUGGESTED EDIT: "The IESO will be submitting this report to the Minister of Energy to signal our intent to implement the following action plan. The IESO will work with the Ministry of Energy and other ministries (e.g., MOECC) to implement the action plan."
23	Recommendation 1 "Change the program delivery model through the Conservation First Framework, to improve access to programming for First Nations communities, regardless of their location or connection to the electricity system."	SUGGESTED EDIT: Change First Nations to Indigenous. While we recognize the intent of this bullet is to address the issue of lack of programming for remote/IPA First Nations, but "improving access to programming' could also relate to the targeted promotions and other recommendations that will apply to both First Nations and Métis.
23	Recommendation 7 identifies partnering with GreenON	SUGGESTED EDIT: Could the IESO add a callout box or a few sentences about what is GreenON and its link to Ontario's Climate Change Action Plan?
24	"Launch a portal for..."	SUGGESTED EDIT: Is the portal intended to be an online portal? If so suggest: "Launch an online portal..."
24	"Partner with GreenON to establish funding and develop programs that support First Nations communities in reducing their reliance on greenhouse gas emitting fuels."	QUESTION TO IESO: Is this recommendation specifically for remote (non-grid connected) First Nations? If so, should that be specified? Or is this intended to be for all First Nations? And if so, then should it also include Métis?
25	"Through the research and engagement process that formed the basis for this report... - one that focused on understanding the energy conservation challenges facing First Nations people in some of the province's most remote communities..."	Could Métis people be included in the conclusion as well? Métis are mentioned on page 26 in the last sentence but not equally represented in the entire Conclusion.

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25	“Of all the input received, perhaps the most striking was a shared desire to learn more about energy efficiency, to practice energy conservation more routinely, and to initiate new behaviors that would lead to greater energy independence. There was pragmatism, coupled with unflinching determination, in this shared outlook.”	The wording in the paragraph may be difficult for some people to follow/understand. Could IESO please clarify what this means? CORRECTION: change ‘behavior’ to ‘behaviour’
26	“The IESO will continue to listen, to engage, to course correct as necessary, and to move forward, all in the spirit of enabling the province’s culture of conservation to become more deeply anchored in all parts of the province, particularly those of our country’s First People.”	“...our country’s First People” could be misconstrewed as possessive (similar to Ontario’s First Nations). Suggest changing. This sentence may be difficult for some people to follow/understand. Could IESO please clarify what this means?
27-29	Appendices Energy Conservation Programs in Ontario	QUESTION TO IESO: Has the IESO sought approval from Hydro One, Hydro One Remotes, the Affordability Fund Trust and Conservation on the Coast for the program descriptions? Recommend also including the conservation programs available through Enbridge and Union (could do a single link to OHECIP.ca), as well as GreenON.ca.
	Appendices	Does HAP have any application here? Or is it replaced by Indigenous specific programs.