

Throwing logs: The 2025 Integrated Resource Plan and Learning from Indigenous Nations

**A CROSS-CULTURAL CRITIQUE OF MANITOBA HYDRO'S
PROPOSED 2025 INTEGRATED RESOURCE PLAN**

**A Report Prepared for the
Wa Ni Ska Tan Alliance of Hydro-Impacted Communities**

by

Stéphane McLachlan, PhD

June 21, 2026

Throwing Logs: A Story

“People know in our community what's missing, what's gone. And what needs to be done. But these are the people that are left at home. They're no good: we're talking about the future, we're not talking about yesterday. But the people who know, we need to get back to them. Sometimes you get lost, you know. It's those people at home that are going to find you.

There was a death in Thompson, and I'm told where some guy fell in the lake in the river. And the people that searched around the area where the person fell in that water. One of our Elders, this guy's dad, says “no, he didn't go down there”. So he got himself a log and threw it in the water. And that log went under the water. They followed that thing. They followed that thing. It surfaced way downstream in a bay area like that. And that's what that Elder had said “you're going to find the body right in the bay area”. That's where that log was, and that's where they found that body. That's a traditional engineer. And those are the people that are gone already.”

Elder Mervin Garrick Pimicikamak Cree Nation. 2026.

Declaration

I understand that my duty in providing written and oral evidence is to help the Public Utilities Board and that this duty overrides any obligation to the party by whom I am retained or the persons who have paid or are liable to pay me. I confirm that I have complied with and will comply with my duty.

I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.

I acknowledge that it is my duty to provide:

- evidence that is fair, objective and non-partisan
- evidence that relates only to matters within my expertise or specialization
- such additional assistance to the Public Utilities Board as it may reasonably require to determine any relevant issues.

Acknowledgements

Thanks to all those who participated in helping shape this report. I attempted to foreground Indigenous voices from northern Manitoba in this work, most of whom reside in hydro-impacted First Nations. This would not have been possible without people's willingness to participate in interviews, notwithstanding how traumatic hydropower has generally been in their lives. We also interviewed others who could provide technical insights into energy alternatives, the TAC, and the BC IRP – all of which also shaped our understanding and informed this report. Many Manitobans also responded to our online survey. This work had to be completed in very short timelines, which was also much appreciated. The work wouldn't have been possible without the research collaboration with Dr Addis Benyam and Ishaan Denetto McLachlan. Additional research support was provided by Dr Shanna Lorenz, Michael Tyas, Delve Banihabib, Yiseul Kang, Urooba Ahmed, Mat Scammell, Amy Marques, and Parinaz Joneidi Shariat Zadeh. And of course the advice from First People's Law, in particular Charlotte Connolly, Bruce McIvor and Austin Goyer. The other Wa Ni Ska Tan experts, Leslie Dysart and Daniel Gladu Kanu, as well as the coordination skills of Kelly Janz also proved critical. However, any errors and oversights are mine and mine alone.

Land Acknowledgement.

This report was prepared and written in Treaty 1 and Treaty 5 in Manitoba, the traditional territory of the Anishinaabeg, Ithinew, Anisininew, Dakota, and Dene Peoples and the Inuit. And also the homeland of the Red River Métis. Together as Indigenous and non-Indigenous land defenders in these and other territories across the country, we act to recognize and redress past and ongoing harms and to forge a better and more equitable future together.

Executive Summary

Context and Mandate: The Manitoba Public Utilities Board (PUB) is reviewing Manitoba Hydro's (MH) proposed 2025 Integrated Resource Plan (IRP) under The Manitoba Hydro Act and approved Wa Ni Ska Tan (WNST) as an intervener in Order 39/26. This independent cross-cultural report critically evaluates the IRP for its approaches to public and especially Indigenous engagement, assessment of climate and other related risk, and potential contribution to energy alternatives and demand-side energy efficiency.

Methodology: MH filings, engagement materials, information-request responses, survey data, Technical Advisory Committee (TAC) records, and survey-based data to the general public and to Indigenous leadership were critically evaluated. In large part because of the shortcomings of this MH engagement, this report further draws on the outcomes of interviews with members from five northern First Nations as well as with technical, energy-policy, TAC members, and the primary First Nations intervener in BC Hydro's IRP review. In the light of a documented exclusion of northern Indigenous voices, an online survey was sent out through WNST's network of contacts. Aimed at members of northern Indigenous communities, it documented responses to the IRP, attitudes towards MH, and ideas for future iterations of the IRP.

Key Findings: MH's public engagement was consistently limited to the IAP2 "inform/consult" portion of the Participation Spectrum in all of its outreach activities and was too late and restrictive to shape the preferred road map. Northern and grassroots First Nations perspectives were largely excluded from participating in the IRP at all. This, northern respondents provided about one-third of the MH's >11,000 survey responses. Although 90.1% of the residents in the northernmost FSA code (R0B) zone are Indigenous only four Indigenous respondents were from this postal code, despite its representing a majority (67%) of Manitoba's land area.

All First Nations interviewees indicated that they had never heard of the IRP, and that the shortcomings of this engagement reflected longstanding refusal on the part of MH to genuinely collaborate and work with hydro impacted-communities. Importantly, they widely felt positive about the proposed changes to electricity production, especially if it would reduce the province's current reliance on northern hydro production and the resultant stress on local ecosystems, livelihoods, and community wellbeing. They characterized Manitoba's engagement with their communities but also suggested a wide diversity of useful responses to these shortcomings most of which were people-centered and grounded in truth, reciprocity and relationship as well as an active willingness to undertake such proactive measures with Manitoba Hydro.

The BC IRP represented a highly relevant analogue, especially as it related to Indigenous engagement, which in sharp contrast to the 2025 IRP was conducted through in-person meetings and workshops with multiple First Nations as well as its acknowledgement of and explicit commitment to Indigenous rights. Such approaches were missing from the 2025 IRP that only spoke to Indigenous priorities in the form of

economic reconciliation regarding Indigenous majority-owned wind power. The great majority (>90%) of respondents to our WNST survey were similarly committed to Indigenous rights during the IRP process. As with the MH survey outcomes, respondents were concerned about the affordability and reliability of power in the North but also showed substantial interest in community-led energy alternatives including solar and geothermal in achieving these ends.

Recommendations: MH should reform its frame and approach regarding public and especially Indigenous engagement. Passive information-sharing and technical feedback should be complemented by active collaboration, partnership-building and joint knowledge exchange and ideally decision-making. Community-directed outreach should begin early in the next IRP iteration, making use of relevant surveys directed at northern communities as well as interviews, local meetings and land-based workshops. Progress should be tracked from ideation to operation, in inclusive and transparent ways and outcomes tailored to resonate with northern and Indigenous communities. Climate, economic and political risk assessment and uncertainty should be better incorporated in ways that bridge Western and Indigenous Science. In parallel, Indigenous-led energy alternatives should extend beyond utility-scale wind power and include community scale solar and geothermal.

Before future IRP cycles proceed, Manitoba Hydro should prioritize relationship building with First Nations and explicitly recognize Indigenous rights and equity; only then should the process incorporate past, present, and predicted environmental impacts into planning and decision-making for the next IRP iteration

Table of Contents

<i>Throwing logs: The 2025 Integrated Resource Plan and Learning from Indigenous Nations</i>	1
<i>Declaration</i>	3
<i>Acknowledgements</i>	3
<i>Land Acknowledgement.</i>	3
<i>Executive Summary</i>	4
1.0 Preamble	9
2.0 IRP: Necessary but Inadequate	15
Economic Reconciliation	17
Indigenous Rights and IRPs	19
3.0 Scope of the Manitoba Hydro 2025 IRP	20
2025 IRP and the PUB	20
Restricted Scope of PUB.....	22
Advice and recommendation by design	23
4.0 Benefits of the IRP	24
Overall IRP benefits	24
Reduced burden on northern systems	25
Proportionate equity	26
Reduced environmental burdens and stress on traditional livelihoods.....	30
5.0 Public Engagement	32
Inform vs. Consult on the TAC.....	36
6.0 Indigenous Engagement	40
Interested Parties and Indigenous engagement	42
Limited and non-attributable engagement with First Nations leadership	43
Constituency-specific input and Manitoba Hydro’s evaluation framework.	44
Socio-economic themes (economic reconciliation and economic opportunity) and rightsholders input.....	47
Technocentric and reductionist approach to risk management	50
Additional risks not anticipated by the Order in Council (12/2026)	51
Traditional livelihoods	52
Health and safety.....	52
Cultural wellbeing.....	53

Future Generations	54
7.0 A case study: Indigenous Engagement as reflected by the BC IRP	55
Proper analogue	56
General public survey and First Nation participation.....	56
Dedicated First Nations engagement in BC 2021 IRP process.....	57
How BC Hydro reflected earlier First Nations feedback into later planning.....	58
Relevance to Manitoba Hydro's 2025 IRP.....	60
The application of IAP2 in the IRP processes	63
8.0 Community experiences with Manitoba Hydro and the IRP	64
Institutional change	64
Limited Reach.....	65
TAC and Indigenous Engagement	68
R1 and R2 Survey and Indigenous Engagement	69
9.0 Existing Indigenous engagement by Manitoba Hydro.....	80
Land acknowledgement	80
Inaccessible and technocentric	83
Inadequacy of survey	84
Lack of integrity	84
Deliberate and intentional	86
One-way and an inability to listen and learn	86
Poor follow-up.....	87
Not engaged	87
Hand picked.....	90
Grassroots	92
Manipulate	94
Economic reductionism.....	96
One, done deal	97
Local willingness to meet	100
Willingness on the part of Manitoba Hydro to learn	100
More effective outreach	101
More than consultation	103
Reduce impacts by managing Northern hydro differently	104
Build capacity	104

Be people-centered	105
Collaboration and partnership	106
Indigenous rights	107
Indigenous leadership in Manitoba Hydro governance.....	111
Senior Management on the land, not boardrooms.....	112
Create economic opportunities.....	112
Speak the truth.....	112
Indigenous energy alternatives.....	113
Hydro-related lack of capital to invest	117
Relevance to the North	118
Small scale:.....	118
Relevance	121
10.0 Risk Analysis.....	122
Economic	124
Political risks.....	126
Climate	127
Legal, regulatory, political risk	130
11.0 Customer-side solutions	131
Customer-side solutions at the program level	131
Customer solutions and First Nations.....	132
12.0 Conclusions and Recommendations	136
13.0 References.....	142

“Looks good on paper, but will it happen? Will we see results? I am very pessimistic when it comes to Manitoba Hydro promises.”

WNST Survey, R17 (First Nations, off-reserve)

“Visit the communities before the document is developed so Indigenous Communities are made to feel that their issues and concerns are heard firsthand and taken seriously. Instead of asking for comments after the fact with no guarantee that the issue or concerns will even be addressed.”

WNST Survey, R27 (First Nations, on-reserve)

“This is a very important initiative. There's a lot of positive things that could happen from the IRP, and you know it could offset a lot of things too. Like, for example, I think we have to find a different resource to power our communities. To me, my opinion, and the opinion of a lot of our co-op members, the water system is stressed, stressed as is.”

Chris Clarke, President, Norway House Fishermen's Association

1.0 Preamble

1. Manitoba Hydro (MH) proposed a 10-year Integrated Resource Plan (IRP) representing a “high-level” strategic plan, which adds 1,760 megawatts (MW) of accredited capacity over 10 years.

2. The IRP will increase the total capacity of Manitoba's electric system from ~ 6,200 MW to ~7,200 MW, an increase Manitoba Hydro anticipates is sufficient to deliver on this province's energy transition. The recommended development plan will ostensibly meet net-zero grid by 2035 and supports a path to a net-zero economy in Manitoba by 2050.

3. Manitoba Hydro generated a road map that represents a non-prescriptive guide as informed by public input and ongoing monitoring. It consists of five steps:

i) Recommended Development Plan: activities and investments that will meet Manitoba's energy needs in Manitoba.

ii) Alternative Development Plan: a second option showing viable but less preferable solutions.

iii) Learnings: key insights arising from its modelling, analysis, customer research, and public engagement.

iv) Near-Term Actions: Manitoba Hydro's commitments to implement the plan and support further planning over the next five years.

v) Signposts: Indicators of progress (e.g., policy, technology, market trends) that will serve to provide feedback.

4. The IRP consists of five main components:

- i) Customer-side energy efficiency solutions totalling 860 MW by 2035;
- ii) Natural gas/biomethane-fuelled combustion turbine, totalling 750 MW by 2030.
- iii) Indigenous-owned Wind power totalling 600 MW¹ added by 2035;
- iv) Enhancements to existing hydropower achieving a minimum of 25 MW of capacity by 2029;
- v) Utility scale battery storage for up to five MW by 2034.

5. The 2025 IRP builds on the foundation established by Manitoba Hydro's first-ever 2023 IRP. It strengthens the utility's planning framework and establishes "a repeatable and adaptive process for future resource planning" (2025 IRP, p21). The IRP will thus continue to evolve to ensure it reflects emerging trends, incorporates public input, and works towards for a sustainable future for Manitoba.

6. The IRP was submitted to the Manitoba government on January 26, 2026, which then forwarded it to the Public Utilities Board (Board) for review along with an Order in Council (OIC 12/2026) that posed 13 questions that set the scope for the subsequent regulatory hearings. The Wa Ni Ska Tan Alliance of Hydro-Impacted Communities applied for and was approved as an intervener in March 2026, and the author was approved as an Expert.

7. I am a Full Professor in the Clayton H Riddell Faculty of Environment, Earth, and Resources at the University of Manitoba. My research programme over the last 25 years as conducted through our Environmental Conservation Lab, has focused on the socio-environmental implications of industrial activity across western Canada, notably on hydroelectric projects, oil and gas, and agriculture. This work has been conducted in close and sustained collaboration with many Anishinaabe, Ithiñew, Anisiniñew, Dakota, and Dene First Nations and with Indigenous organizations in these same provinces and territories. Our work seeks to document and respond to the continued shortcomings of Indigenous engagement in intensive resource extraction, most of it focusing on energy and related planning and management. Our approach is cross-cultural in nature as it explicitly bridges the Western and Indigenous Sciences when evaluating impacts and community-led responses to such energy projects.

8. I am also a founding member of the SSHRC-funded Wa Ni Ska Tan Alliance of Hydro-Impacted Communities. Wa Ni Ska Tan is an Alliance of Indigenous leaders and land users, university researchers, law firms, and NGOs that collaborate to evaluate the implications of hydroelectric power for environments and Indigenous communities alike. Named by the late Elder David Lathlin, Wa Ni Ska Tan is Cree for "wake up" as reflected in our mandate through the wide diversity of research, educational and outreach activities we undertake as a cross-cultural Alliance. This mandate informs our involvement in the 2025 IRP as an intervener, and my writing of this evidence report as an expert in the socio-environmental sciences and studies and in Indigenous engagement and community-led energy solutions.

9. My overall goal in this report is to evaluate the 2025 Integrated Resource Plan as proposed by MH, through a cross-cultural and critical socio-environmental lens. I will argue that many components of the 2025 IRP are inadequate, focusing here on their engagement of Indigenous communities and organizations but also extending this to include Indigenous-identified risks and uncertainties, especially as related to climate, Indigenous led energy alternatives and demand-side energy conservation on reserves.

10. As part of our approach, this author worked most closely with Dr Addis Benyam, an independent researcher with a diverse academic background in natural resource and environmental management and Ishaan Denetto McLachlan, who just completed his first year of law at the University of Toronto. This team critically evaluated Manitoba Hydro's responses to Information Requests (IRs) that addressed the above priorities, these focused on but not restricted to IRs submitted by Wa Ni Ska Tan. This was accompanied by a critical evaluation of the survey data and meeting notes ultimately provided by Manitoba Hydro as well as a detailed evaluation of the ongoing BC IRP as a case study, an effective analogue to the 2025 IRP especially as related to Indigenous engagement.

Table 1. List of 16 interviewees from five First Nations in northern Manitoba.

Participant Code	First Nation	Class	Gender	Role	Date
RS	TCN ¹	Landuser	M	KK	5/6/2026
WH	TCN	Landuser	M	KK	5/6/2026
JH	TCN	Landuser	M	KK	5/6/2026
NB	TCN	Landuser	M	KK	5/6/2026
RM	PCN	Landuser	F	Elder	5/27/2026
LM	PCN	Landuser	F	KK	5/27/2026
FB	PCN	Landuser	F	Leader	5/27/2026
MG	PCN	Landuser	M	Elder	5/27/2026
JO	PCN	Landuser	M	Elder	5/27/2026
CC	NHCN	Fisher	M	Leader	5/28/2026
LD	OPCN	Landuser	M	Leader	6/6/2026
JS	OPCN	Landuser	F	Leader	6/3/2026
DD	OPCN	Landuser	M	Elder	6/3/2026
CM	OPCN	Fisher	M	KK	6/3/2026
RM	OPCN	Fisher	M	KK	6/3/2026
CA	FLCN	Landuser	M	Leader	6/12/2026

¹TCN: Tataskweyak Cree Nation; PCN: Pimicikamak Cree Nation; NHCN: Norway House Cree Nation (Kinosao Sipi); OPCN: O-Pipon-Na-Piwin Cree Nation; FLCN: Fox Lake Cree Nation (Makaso Sakahigan).

2. KK: Knowledge Keeper

Table 2. List of interviewees with outside technical expertise and experience with IRPs.

Participant Code	Organization	Role	Expertise	Date
MB	FNEMC ¹	Senior Manager	BC IRP and First Nations engagement	6/15/2026
CLM	CAT	Senior Researcher	Community-scale energy alternatives	5/26/2026

TAC1	-	-	TAC	5/21/2026
------	---	---	-----	-----------

¹FNEMC: First Nations Energy and Mining Council; CAT: Climate Action Team

11. This emphasis on First Nations, and especially grassroots perspectives, was only possible given the very tight timelines associated with the PUB Hearings through our long-term networking and partnerships with First Nations in Manitoba and other parts of Canada. But our outreach should not be construed as representative of any or all First Nations in the province or for that matter even all opinions within any given First Nation, which are far from homogenous and which reflect as wide a diversity of perspectives on energy as do any community in this country. Accepting that one should be cautious when generalizing from such data, there is no doubt that northern Indigenous voices were almost entirely excluded from the 2025 IRP as a process and as an outcome. It thus represents a critically important component that has been provided to help address this gap and is presented to the Board as such.

12. Importantly, such cross-cultural or braided approaches that include the priorities, knowledge, and rights of Indigenous Peoples alongside those that are grounded in Western Science and technologies give added and rich insight. Also widely referred to as two-eyed seeing or *Etuaptmumk* (Bartlett et al. 2012) and grounded in the worldviews of Mi'kmaq Elders Albert and Murdena Marshall, such integrated approaches bring added understanding and legitimacy and ideally will emerge to play a key role in all IRPs especially that of the Manitoba IRPs in the future.

13. Ultimately, it is argued here that the outreach undertaken by Manitoba Hydro regarding the IRP approaches a “worst practices” approach to public engagement, contrary to claims by Manitoba Hydro,

“The general public was engaged through regular updates at key milestones, opportunities to subscribe for ongoing information and input, and targeted efforts focused on energy literacy. Engagement efforts with this audience focused on seeking feedback on potential energy choices and understanding what is important to customers in considering the energy future in Manitoba.”
(2025 IRP Engagement Report, p8).

14. The systemic underrepresentation of all Indigenous voices and the effective exclusion of these northern Indigenous voices is reflected in the Manitoba Hydro proposal and its responses to information requests as well as data arising from two rounds of public surveys, a survey of Indigenous leadership, and meeting notes from the IRP Technical Advisory Committee.

15. We thus addressed the near absence of any Indigenous voices in the IRP-related engagement and documentation conducted by Manitoba Hydro through our own efforts at data collection. This included interviews with a mix of leadership and land users from five First Nations in northern Manitoba (**Table 1**); conversations and interviews with other

experts including members of the 2025 IRP Technical Advisory Committee (TAC), energy experts and the primary First Nations intervener in the BC IRP (**Table 2**); and finally a survey that was explicitly aimed at addressing the priorities and concerns of northern Indigenous Manitobans regarding the IRP.

16. However, this report and the many northern Indigenous participants who we spoke to were not limited to criticisms of Manitoba Hydro and its regional energy planning. We thus also focus on tangible Indigenous-led solutions that will ideally help inform Manitoba Hydro in future iterations of the IRP as related to Indigenous engagement, assessing risk and uncertainty, community-scale energy alternatives, and demand-side energy efficiency

“IRP processes are established to evolve, mature and to implement continuous improvement. Understanding this, Manitoba Hydro continually monitors and reviews other utilities’ IRPs and their development processes in pursuit of best practices. In addition to seeing how other IRPs are developed, the content and outcomes of other utilities’ IRPs, particularly those of Canadian utilities in similarly cold climates, can productively inform Manitoba Hydro’s planning.” (2025 IRP, p32).

17. To that end, I conclude the report by making the following recommendations:

- That Manitoba Hydro conduct a comprehensive and critical review of its own regional energy planning as it relates to human-centered approaches including public engagement, Indigenous engagement, community-led energy alternatives and demand-side conservation, and that it makes this review public - especially to northern Indigenous communities.
- That the restricted scope presented by the OIC (12/2026) be repositioned to better enable Indigenous participants to engage in the process by being able to speak to past and ongoing impacts as they relate to future iterations of the IRP. Not doing so ultimately excludes them from sharing what they know about the past, present and future when it comes to energy planning and alienates them from being meaningfully engaged in the planning process.
- That Manitoba Hydro explore how and to what degree stress on both northern ecosystems and trauma on Indigenous communities might be reduced by the IRP and what management decisions would be required to enable this change.
- That the implications for a reduced reliance on northern hydro production potentially arising from the IRP and its focus on southern energy should be documented in collaboration with community through future IRP cycles, especially as it relates to the anticipated resurgence of the traditional use wildlife, fish and medicines and in turn traditional livelihoods and community wellbeing.
- That made-in Manitoba approaches to public engagement be developed for future energy planning rather than relying on generic and largely inadequate templates like the IAP2 and that better reflect the often-unique challenges but also opportunities when it comes to energy planning in this province.

- That Manitoba Hydro explore ways of shifting its engagement activities along the participation gradient to include collaboration if not empowerment. This would especially be the case for its Technical Advisory Committee and the recently announced Indigenous Advisory Circle whose mandates as advisory appear to be restricted by Manitoba Hydro.
- That factors important to northern First Nations become incorporated into the evaluation metrics and signposts in a transparent and collaborative process, these including but not restricted to community infrastructure, housing, culture, traditional livelihoods, health, wellbeing, and equity.
- That Manitoba Hydro adopt some of the key elements regarding Indigenous engagement as reflected in the BC IRP. These would include the creation of a separate stream of Indigenous engagement, as well as opportunities and support for meetings, workshops, training, and knowledge exchange that are aimed at the leadership and grassroots of individual First Nations as well as Tribal Councils in Manitoba.
- That the process of outreach and engagement with northern communities begin at least 2-3 years before the next iteration of the IRP is submitted, which would enable the relationships that are identified in this report as being so crucial to emerge. Indeed, before commencing on this plan, meetings should take place among communities, Indigenous organizations and senior management at Manitoba Hydro to explore what is desired and what is feasible for all those involved.
- That the barriers to effective Indigenous engagement in the TAC be documented in detail and ways of addressing any such barriers be addressed to facilitate a wider diversity of Indigenous voices as well as the inclusion of a braided approach that incorporated both Western and Indigenous Science on the TAC. And that both the TAC and IAC be evaluated for impact and process in a way that is inclusive so that any such barriers can be proactively addressed.
- That surveys that Manitoba Hydro used as a (the) primary tool to educate and get feedback on the 2025 IRP substantially underrepresented northern residents of the province and especially northern First Nations residents, an underrepresentation that can in part be addressed through some other platforms for outreach and survey recruitment, using social media like Facebook, Twitter/X, and Instagram and perhaps conducting a subset as in-person household surveys.
- That Manitoba Hydro's engagement with northern First Nations seems to be characterized by working only with leadership, if this even occurs, or with hand-picked community members rather than working with the larger community. Existing outreach practices would benefit from being independently reviewed to see how and why they continue to underachieve, what might be done to address such shortcomings, and also what success stories do exist, all of which could in turn help inform future iterations of the IRP.
- That Manitoba Hydro incorporate approaches to Indigenous engagement that are people-centered and that they become willing to learn and to accept responsibility for past and ongoing harms as the utility company reframes its Indigenous

engagement to be relationship- and community-based as it works to incorporate some of the rich insights provided by previously excluded landusers in its management activities and energy planning.

- That Manitoba Hydro recognize the importance of Indigenous rights and sovereignty in its planning and management activities, rather than treating Indigenous communities as yet another stakeholder, and in so doing explore ways of equitably collaborating and partnering with communities in future iterations of the IRP as demonstrated in both the BC IRP and Yukon Regional Energy Planning.
- That Manitoba Hydro and Manitoba address the hydro-related loss of livelihoods and the economic base of hydro impacted communities, notably as related to commercial fishing but also trapping and hunting, by exploring ways that subsidy programs could be used to enable such Nations to invest not only in mega wind power but also in other smaller scale energy infrastructure.
- That Manitoba Hydro build on the strengths of its proposed Indigenous majority - owned wind power to explore how to better support community-led energy alternatives that are not only now technologically viable but that would make a huge difference in quality of life in northern Indigenous communities in ways that would recognize and address ongoing harms that reflect the power of reconciliation as presented by the Truth and Reconciliation Commission.
- That Manitoba Hydro build on the strengths of its quantitative modelling and its use of Evaluation Metrics in the 2025 IRP by expanding them to include place-based climate, economics, and political risks and uncertainties identified by northern communities and their Indigenous Science, which will only strengthen the predictive capabilities of these models.
- That Efficiency Manitoba conduct a public review of its existing Indigenous-centered programming and identify any successes and gaps. In so doing, it would co-design energy efficiency initiatives with Indigenous Nations that at once recognize and adapt to the substandard condition of existing housing, that build local capacity and employment opportunities in this sector, and that such options be made accessible to any interested Nations and community members.

18. It is important to note that these recommendations are presented by this author. The Wa Ni Ska Tan Alliance of Hydro-Impacted Communities does not necessarily endorse any particular recommendation, nor does it necessarily endorse this suite of recommendations as a whole. While each and every recommendation listed here is grounded in evidence and the associated literature, it is not exhaustive. Notwithstanding any such limitations, this report is designed to ideally be useful for the PUB and Manitoba Hydro, and thus to help shape the 2025 IRP and its future iterations.

2.0 IRP: Necessary but Inadequate

19. Integrated Resource Planning (IRP) emerged in the 1980s as a response to widespread societal concern regarding uncertainty regarding reliable access to and the cost of energy (Hirst & Schweitzer, 1990; Hirst & Goldman, 1991; Hirst, 1992). Initially proposed by public utility regulators and vertically integrated electric utilities, IRPs represented a response to narrow supply-side planning to more comprehensive plans that included both supply and demand side elements. Over the last 30 years, IRPs have evolved from least-cost approaches to further target the environment, including climate change, decarbonization, energy justice as well as the engagement of stakeholders and rightsholders (Abram et al., 2022; Baasch, 2023; Hirst & Goldman, 1991). Of special note to this report are now beginning to meaningfully include Indigenous concerns and rights, although how and to what degree are still debated (Manning, 2023; Papillon & Rodon, 2017; Papillon & Rodon, 2020).

20. Least-cost planning characterized regional planning conducted during the 1980s and 1990s and differed from traditional planning as it included both supply and demand side resources and sometimes projected 20-30 years into the future (Hirst et al., 1991; Hirst, 1992). Focusing on economic energy efficiency and priorities, any public participation was limited (Hirst, 1992, Saito, 2020). There were still opportunities for the public to review plans and to participate in hearings, but any influence was largely restricted to utilities and regulators, with broader participation by non-utility parties identified as an area still requiring improvement (Schweitzer et al., 1990). Some argue this still the case with current IRPs (Baasch, 2023; Cutts et al., 2023), especially regarding Indigenous people (Manning, 2023; Papillon & Rodon, 2017). This would also include Manitoba Hydro's 2025 IRP as we will show in this report.

21. Sustainability planning characterized IRPs conducted from the 1990s to 2010 evolved to at least be cognizant of environmental priorities that had become widespread societal concerns (Hirst & Goldman, 1991).. These were still widely criticized as being dominated by technocentric planning that continued to favour economic priorities of and control by utility companies at the expense of broader environmental societal concerns (Krupa et al., 2022; Manning et al., 2023).

22. Current IRP approaches have evolved to include energy transition. Widespread recognition of the threats represented by climate change highlighted the need for an energy transition and net zero targets that was enabled by concomitant declines in the costs of and increases in the effectiveness of renewable technologies (Breyer et al., 2022). Such plans increasingly consider utility-scale wind power, solar photovoltaics, battery storage. Such changes in technology in turn have enabled more flexible and decentralized electrical systems and the engagement of a wider diversity of publics (Baasch, 2023; Sareen, 2021).

23. Of special note here was the increased recognition if not active inclusion of Indigenous peoples in IRPs. In Canada was at least in part driven by a series of Supreme Court decisions including additional rights arising from historic and modern treaties. Indigenous

communities have inherent rights to harvest resources for subsistence use and require compensation for any infringement that the Crown is unable to justify (Sparrow decision) (Dickson, 1990). Consultation is required, particularly in relation to anticipated infringement on Indigenous title (i.e. use and occupancy) of traditional lands, this title encompassing surface and subsurface rights (Delgamuukw decision) (Dacks 2002). Infringement can only be justified by the Crown if communities are consulted in good faith and informed beforehand (Boyd and Lorifice, 2018; Lajoie-O'Malley et al., 2023; Blue et al., 2023). These rulings were accompanied by associated Calls to Action of the Truth and Reconciliation in 2015 (TRC, 2015) and Canada becoming signatory to the United Nations Declaration of the Rights of Indigenous Peoples in 2021 (Adkins et al 2020).

24. Yet, there is no mention of rights, Indigenous or otherwise, justice, or rightsholders in the 2025 IRP. Any reference to Indigenous peoples, Nations or organizations is often included amongst a list of stakeholders,

“All Manitobans, governments, Crown corporations, regulators, interested parties, and Indigenous peoples and communities have important roles to play in the next steps” (2025 IRP, 59)

And again under Learning 5,

“There’s an opportunity for the energy planning community (including Manitoba Hydro, governments, regulators and interested parties such as customers and Indigenous peoples and communities) to work together in the best interests of Manitobans” (2025 IRP, p64)

The absence of any such rights and responsibilities in the 2025 IRP and possible responses to address this major shortcoming is highlighted through our case study regarding the BC IRP.

Economic reconciliation

25. In total, the term reconciliation was used 12X in the report. Of these, 11 uses were linked to the term “economic reconciliation), which MH defined as

“Economic Reconciliation: Potential to promote economic reconciliation with Indigenous peoples, Nations, businesses, and governments. This metric considers the potential of a development plan to promote economic benefits for Indigenous peoples, Nations, businesses, and governments, such as employment and training opportunities, investment options (including ownership), opportunities for early project engagement, and participation in procurement.” (2025 IRP, p81 (Glossary)).

26. More specifically most of these references were linked to Indigenous majority-owned wind power,

“ Wind generation diversifies the resource mix and offers low-cost energy while supporting broader socio-economic goals. Specifically, Indigenous majority-owned wind projects align with the Affordable Energy Plan, supporting economic reconciliation and community partnerships.” (2025 IRP, p39 – emphasis added).

27. Yet more broadly it stated,

“[Manitoba Hydro would] Support Economic Reconciliation through engagement with Indigenous Nations in Energy Planning. Indigenous nations are actively pursuing economic development opportunities in the energy transition. Manitoba Hydro will contribute to reconciliation by supporting collaboration with Indigenous nations in energy planning. Through meaningful, ongoing Indigenous participation, we will aim to ensure their perspectives help guide Manitoba’s evolving energy future.” (2025 IRP, p 53)

Indeed, to our knowledge this emphasis on large scale Indigenous majority-owned wind power was not only the primary reference of economic reconciliation, but it was also similarly the only use of the terms collaboration and partnership with Indigenous communities and organizations in the 2025 IRP.

28. There was also some discussion on the part of the TAC as to whether reconciliation should be treated as its own value theme and which resource options are considered to support economic reconciliation but this was deferred to the future by Manitoba Hydro,

Member feedback: *“Some members noted that reconciliation should be considered as its own value theme. The impact of MH on northern communities and the need for a just energy transition were highlighted as significant issues that require attention.”*

MH response: *“It was noted that when comparing future resource development plans, considering opportunities for economic reconciliation is appropriate.”* [TAC Meeting #3, 02/12/2024].

29. And whether economic reconciliation might be expanded to include other resource options within IRP, including combustion turbines and enhanced infrastructure was similarly deferred to the future,

Member feedback: *“A member asked if resources other than wind and energy efficiency programs are being considered to support economic reconciliation, specifically combustion turbines and enhancements to existing hydrogeneration stations.”*

MH response: *“Evaluation metrics will be applied in the next step that includes an evaluation of each potential resource option for its potential to support economic reconciliation, including whether the resource options would support Indigenous ownership, training, employment, and business opportunities.”* [TAC Meeting #7, 17/07/2025]

30. We will show below that such deferred responses to questioning and innovative ideas generated by the TAC were commonplace and reflect another shortcoming in public – and especially Indigenous – engagement represented by the 2025 IRP.

Indigenous Rights and IRPs

31. Existing IRPs, resource planning, and energy projects and planning as a whole have been criticized as continuing to fail to include much less to affirm Indigenous rights and associated commitments to international agreements such as UNDRIP, and their failure when it comes to generating meaningful opportunities for Indigenous peoples (Adkins et al, 2020).

32. Regional IRPs have been conducted across the United States as well as throughout the European Union over the last 30 years. In Canada they are a relatively recent phenomenon. They were first conducted by BC Hydro (early 1990s), Ontario Hydro (mid 1990s), and SaskPower (1990s). The most recent phase of Canadian IRPs focusing on energy transition and net zero goals that are relevant here was first initiated by the BC Utility Company (BCUC) in BC in 2021, the Yukon Regional Planning proposed in 2025 as well as Manitoba Hydro’s first IRP, also proposed in 2025. Of these, the 2025 IRP proposal submitted by Manitoba Hydro represents an important regionally coordinated approach to planning that should not be dismissed. Moreover, it does explicitly include and facilitate Indigenous majority-owned energy alternatives, in this case wind power, which are a major advance when it comes to this province’s energy planning.

33. Yet it is far from ideal and in comparison to its other Canadian counterparts, this author argues that it falls short in substantial ways including the inadequate level of public engagement, the failure to explicitly dress or recognize Indigenous rights, a “worst-practices” approach to Indigenous engagement, an urban-centric focus on natural gas turbines, the absence of any other smaller scale energy alternatives that might better address the deficiencies in safety and reliability of energy in and by Indigenous communities, and finally an inadequate approach to demand-side energy conservation that effectively sidelines First Nations and other northern Indigenous communities. Although all these will be reflected in this report and are grounded in the worldviews and priorities of northern First Nations, I will argue that the re-centering of Indigenous engagement effectively limited any real insight much less change regarding those other priorities and thus receives the greatest emphasis in this report.

Recommendation 1: That Manitoba Hydro conduct a comprehensive and critical review of its own regional energy planning as it relates to the human-centered approaches including public engagement, Indigenous engagement, community-led energy alternatives and demand-side conservation, and that it makes this review public.

3.0 Scope of the Manitoba Hydro 2025 IRP

2025 IRP and the PUB

34. The PUB was directed under subsection 38.1(4) of the Manitoba Hydro Act to review the 2025 IRP by way of a public hearing and to issue a report and its recommendations to the Minister of Finance. The scope of its reviews and recommendations was framed by 13 questions as reflected in an associated Order in Council or OIC (No. 12/2026). The following were assessed as out of scope under the OIC. Any formal consultation with Indigenous Nations related to Section 35 would be conducted under a separate Crown-Indigenous consultation process. Historical environmental costs and any environmental reviews of projects included within the IRP were also deemed out of scope and the latter would instead be conducted at the individual project level through the Clean Environmental Commission (OIC 12/2026, p3).

35. The OIC posed 13 questions that were used to frame the scope of the 2025 IRP PUB hearings. In its application for intervener status, Wa Ni Ska Tan indicated that it would focus on public and especially Indigenous engagement (under Order 11-26 Practice Direction as identified by the Board), Q#1 (the IRP planning Objectives), Q#2 (evaluation methodologies), Q#6 (preferred resource options, notably wind power), Q#11 (key risks and uncertainties notably those involving climate, economic and political risks).

36. Manitoba Hydro claimed that Wa Ni Ska Tans proposal for intervener status should be rejected because past environmental impacts had been ruled out of scope, that the proposed experts were not independent and were indeed biased as “anti-hydro activists”; that Wa Ni Ska Tan and its proposed experts were affiliated with Jerch Law, MKO, and PILC and thus duplicative; and that some Nations that are members of Wa Ni Ska Tan were in ongoing litigation with Manitoba Hydro.

Manitoba Hydro further argued that public engagement was more broadly out of scope since it was not explicitly identified in the 12/2026 OIC,

“[The Manitoba government] then referred it to you with the scope of mandate issues. And nowhere in that scope of specific mandate issues will you see what Interveners are now trying to convince you of, that this IRP has to focus extensively on engagement or consultation processes into the IRP. It does not exist...And this is a living process, so it will get better. It need not be in front of you by way of an expert opinion from now two (2) different consultants on an out-of-scope issue. We will get lost in this process.”

Brent Czarnecki, Manitoba Hydro Counsel, Pre-hearing meeting, p137-138.

37. Ultimately, the Board approved Wa Ni Ska Tan’s application for intervenor status, as represented by Charlotte Connolly from First Peoples Law, indicating that it could “assist the Board in gaining better understanding of the issues before it” (Order 39/26, p34). The Board further indicated that it would indeed “review whether Manitoba Hydro’s stakeholder and public engagement process is appropriate in the context of an integrated resource plan” (Order 39/26, p11). However, it indicated that this review of public engagement should not include formal consultation pursuant to Section 35. It similarly approved that “Wa Ni Ska Tan’s proposal to address unidentified risks and overlooked options and opportunities for Indigenous-led energy resources” (Order 39/26, p35). However, it also cautioned Wa Ni Ska Tan that the IRP and the PUB review proceedings are “forward looking processes and thus excluded any past environmental costs along with any future project related environmental reviews.” (Order 39/26, p37).

38. Having approved me as an expert, the Board directed me to “focus [my] evidence on public engagement as it relates to Wa Ni Ska Tan’s membership and constituents” (p 37), that is Indigenous and especially northern Indigenous communities and organizations, and to ensure that there is no duplication with any other experts focusing on public engagement. Any potential redundancy was in part mitigated by meeting and email communication with both Dr Fitzpatrick (expert on public engagement for Consumer Coalition) and Dr Datta (expert on environmental governance and Indigenous engagement for MKO). This report will thus focus on Indigenous engagement, especially focusing on northern First Nations from hydro impacted regions, while also including community-centred unanticipated risks, alternative energy, and demand-side energy conservation in northern Manitoba as identified during this process. It will do so by centering our critical insights on Indigenous voices as reflected in Manitoba Hydro’s related public outreach and data collection efforts as well as our own.

39. The Board similarly found that public engagement was also in scope,

“The Board finds that Manitoba Hydro’s public engagement and stakeholder consultation are within the scope of this review proceeding. The Board finds it appropriate and necessary to critically assess these topics as part of its review of Manitoba Hydro’s 2025 IRP. The Board will therefore review whether

Manitoba Hydro's stakeholder and public engagement process is appropriate in the context of an integrated resource plan." (Order 39/26, p11).

In part this was because Manitoba had emphasized public engagement throughout its proposal,

"The Board notes that Manitoba Hydro has included in its 2025 IRP filing extensive information related to its consultations and stakeholder engagement."

(Order 39/26, p11).

40. Although this report and those of the other experts contracted by Wa Ni Ska Tan have respected the scope as defined by the OIC, it would be disingenuous not to reflect the deep concern of those northern community members who we interviewed in May and June 2026 about this restricted scope. Our approach to each of the interviews was to explain the IRP and what was being proposed in as neutral way as possible that included some of the infographics included in the 2025 IRP proposal, to highlight some of the areas of emphasis that had been identified by the Board as in scope, and to explain that Indigenous rights under Section 35 and historical and anticipated environmental impacts had been deemed by Manitoba as being out of scope.

Restricted Scope of PUB

41. Indeed, all interviewees generally communicated their frustration with the limited scope, indicating that it would be difficult for the Board to assess the future without understanding and locating any anticipated future changes in the past. As indicated by an Elder from OPCN,

"So, nobody, the Public Utilities Board, are going to understand unless they, they hear it from an individual that that's been there. If they want to talk about the future like they want to talk to me, I have to talk about the past, and then I'll be able to talk about the future more." (DD, OPCN).

42. And as an Elder from Pimicikamak Cree Nation indicated, not incorporating and thus learning from the past so would only help ensure that past mistakes would be perpetuated into the future,

"So you're going to bury the harm [in the IRP evidence]....It's going to get worse. A lot is going to get worse... Climate's going to get worse. Everything's going to get worse." (MG, PCN)

Indeed, this same Elder revealed the shortcomings of this future-only approach to me and indirectly to the IRP Board through a story about throwing logs in order to identify the location of a body, a story that comprises the title of this report and its framing.

43. Moreover, this restricted scope would only serve to reinforce Manitoba Hydro's existing biases and priorities,

“the process is so limiting in scope, where we're not allowed to talk about the realities of hydro. So I think any results coming out of the IRP in the processes will be skewed to Hydro's biases and priorities” (LD, OPCN).

44. Indeed, one of the experts proposed by Wa Ni Ska Tan and approved by the Board was ultimately so frustrated at this limited scope that he withdrew from this role, although he still agreed to be interviewed for this report,

“That's why I didn't want to take part in any of this, because there was too many restrictions, and the narrative was being too coerced and manipulated. How could we respond or reply to any of the questions without referencing what's happened already” (RS, TCN).

Advice and recommendation by design

45. Some interviewees were critical of the advisory role of regulatory boards like the Public Utilities Board and the Clean Environment Commission, arguing that they should have the mandate to compel provincial governments and Manitoba Hydro to address any concerns that had been recognized as part of the review process,

“It's the same thing as a Split Lake Resource Management Board, working with the province. But the Split Lake Resource Management Board are not mandated to make or pass policies or past resolutions. They can only make recommendations, even though we are part of the decision-making body, we are not allowed to make or pass policy. We can only make recommendations. So CEC and PUB are largely ineffective because the government will still do whatever the hell they want to do. Regardless of what the recommendations are. Look at the Truth and Reconciliation. Look at the Calls to Action. How many have they been, how many have they implemented?” (RS, TCN).

36. Recommendation 2: that the restricted scope presented by the OIC (12/2026) be repositioned to better enable Indigenous participants in the process by being able to speak to past impacts as they relate to the current IRP when it comes to future iterations. Not doing so ultimately excludes them from sharing what they know about the past, present and future when it comes to energy planning and alienates them from being meaningfully engaged in the planning process.

4.0 Benefits of the IRP

Overall IRP benefits

46. Much of this report will focus on a wide diversity of shortcomings related to the proposed 2025 IRP and various ways that energy planning might be strengthened to mitigate against these shortcomings in future iterations, especially as related to Indigenous engagement. However, both Manitoba Hydro surveys as well as our interviews with northern community members identified unanticipated positive outcomes that will likely be of interest to the Board.

47. Some survey respondents were highly supportive of the IRP,

“This sounds great!”

WNST Survey, R4 (First Nations, off-reserve)

And commented on how proactive and innovative Manitoba Hydro has been when it comes to energy planning. This as indicated by a First Nations respondent from the northernmost FSA (postal) code in the province,

“Manitoba Hydro has always be innovative in future energy planning. It has been in the forefront for years and hopefully more years to come.” [R_6D6b1An1e28Qr6a_R1] .

48. Some also indicated how willing Manitoba Hydro was in its outreach and education efforts,

“It’s great that Manitoba Hydro wants to inform society on any proposed changes that hydro wants to implement for their customers for support services that would benefit.”

WNST Survey, R4 (First Nations, off-reserve).

49. To the degree that at least some respondents to the Wa Ni Ska Tan survey saw it as yet another attempt on the part of Manitoba Hydro to reach out and engage with its customers,

“Doing surveys like this one, shows they want to hear from the public.”

WNST Survey, R16 (First Nations, off-reserve).

50. There is no doubt that integrated resource planning is critically important, especially if it can address some of the systemic barriers that the 2025 IRP and

many others encounter when it comes to meaningful public and Indigenous engagement.

Reduced burden on northern systems

51. Some of the benefits of the IRP that were identified by Indigenous interviewees focused on an anticipated reduced stress on northern water systems that arose from the reduced dependency on hydro generated electricity, most of which is located in the northern regions of Manitoba. Indeed, currently 97% of the electricity produced in our province arises from hydro dams (MH, 2026),

“This is a very important initiative. There's a lot of positive things that could happen from the IRP, and you know it could offset a lot of things too, like for example I think we have to find a different resource to power our communities. To me, my opinion, and the opinion of a lot of our co-op members, the water system is stressed, stressed as is.” (CC, NHFN).

52. Multiple participants anticipated that the IRP's proposed wind and natural-gas resources in southern Manitoba could reduce reliance on northern hydro generation and thereby benefit traditional livelihoods such as fishing and hunting. However, adding southern resources does not itself establish that northern generation or water-level fluctuations will decline. Such outcomes obviously require a commitment on the part of Manitoba Hydro to change its practices,

“I would like to see wind considered for rural communities and even support for rural landowners to put in own wind power. support for ev chargers in homes. i do not want to see more ruining of first nations lands and hunting and fishing. I feel hydro has destroyed so much land and resources it is time to give back.” [R_7gIQY1LEqvimQQp, R1].

53. Indeed, the 2025 IRP represented an opportunity to explore some renewable alternatives to hydro dams, as indicated by this First Nations survey respondent,

“We have enough Dams, start converting to renewable energy sources.” [R_3FyKFabXQB0CaeN, R1]

Some interviewees felt that this might potentially reduce any need to build Conawapa in the near future at least,

“Well, what if they have a bunch of wind power, a bunch of solar power, a bunch of what's that one that goes into the ground, geothermal, they might not need to build Conawapa in the future if they have enough of those things.” (CA, FLCN)

54. Others indicated that they had no interest in participating in a South-centered regional energy approach – as long as there were no further developments in or adverse implications for the North,

“Don’t engage. Just build what you want down South and leave us the hell out of it. Build your wind plants, and your windmills, and your gas-powered plants in the south. And leave us the hell out of the fucking conversation. And don’t even look over here to build any more” (RS, TCN).

Proportionate equity

55. Given the current reliance on north-generated hydro, Indigenous communities in that part of the province are disproportionately affected by these burdens - on the environment and the livelihoods that depend on a healthy environment. That these adverse impacts are mostly borne by Indigenous residents who receive relatively few of any associated benefits, amounts to environmental racism as defined and legislated against by Bill C-226 in 2024 (Wiebe et al, 2024). However, there is an opportunity to reduce these burdens under the 2025 IRP with its emphasis on south-located energy. Indeed, the 1,760 MW of new electric production that is proposed by the IRP accounts for > 25% of the province’s (hydro-generated) electricity production,

“The projects suggested in the IRP, like wind, mega projects or wind, the natural gas diversity, it’s long overdue. Long, long overdue. There has been too much of a reliance on the destructive hydro dam project that impact communities and decimate the environment and the economics that rely on them. So it’s long overdue. Diversity is needed.” (LD, OPCN).

56. This opportunity to reduce a dependency on electricity production in the North notwithstanding any additional environmental risks associated with an increased reliance on natural gas but that would now be located in the South,

“Natural gas thing is like either way. You have to go into the land, destroy the land to get the get go to where you’re trying to go. You have to make stuff, nothing natural about it. I think it’s time for the South to pitch in, help us out.” (WH, TCN) .

57. This potential reduction in impact is situational since many sites in the North don’t experience adequate levels of wind to power the turbines – the reverse, if you like, of all the situationally located rivers in the northern part of the province,

“There is open fields over there. There’s no open fields here for the windmills. There’s not enough fields there for windmills to work properly up

here, and there's already too much destruction up here for this to be processing through.” (WH, TCN).

58. This disproportionate burden is largely associated with most of the province's population and thus its energy use, to say nothing of any decision-makers, similarly being located in the South (**Plate 6**),

“Where do, where do the majority of the rate payers live? Manitoba Hydro's customers? I believe it's about 60% of the ratepayers from Manitoba live within and around Winnipeg itself, right? We don't want to have any more dams over here. We had no choice. Why give the people in the South, that 60% who are living down there, who use the majority of the power, live with the fact that they have to start finding and looking for ways to produce the power that they need within the confines of that 60% of the area that hydro is used. Why not have them build their windmills and their gas-powered plants down South.” (RS, TCN).

59. Ultimately, though this shift to South-generated power is both overdue and equitable,

“If they need more power in the future, that power should come from the South, regardless of what the southern ratepayers say. Because we had no say in what was happening over here in the North. We had a gun pointed to our head saying to our people, you either take this deal or you don't. We're going to go ahead without you, regardless, and you guys end up with nothing. And then, when we did, when our people did go with it, they still ended up with nothing.” (RS, TCN).

60. Yet, it is also clear that many farmers and other rural residents are already dismayed by and organizing against the proposed mega wind power as seen in the media, this before the IRP much less the wind power projects have been approved (Kemp, 2026). In part this reflects a lack of engagement on the part of Manitoba Hydro, this time with rural communities and a longstanding “perimeter vision” that dismisses anything outside urban centers as being important. But it is not coincidence that the increased visibility of these concerns and associated media attention regarding the proposed mega wind projects will likely be greater than an equivalent initiative would be in the North, given that most residents in these rural areas are white and close to urban centers and given that northern residents are almost exclusively Indigenous and located thousands of kilometers away.

61. Some believe that this reduced reliance would ultimately fail to materialize in part because of the inadequacy of the underlying - planning process,

“I believe Hydro will still rely on those devastating impacts in their back pocket, so to speak, as a backup. I mean, backups are good, but if you have an opportunity to spread the demand with diversification, then you should diminish harm at the same time. And I don't see the IRP reflecting that, because that they don't want you to talk about it.” (LD, OPCN).

62. Some distrusted the long-term intentions of Manitoba Hydro and the Manitoba government, indicating that the once proposed but shelved Conawapa dam would likely be reflected in future iterations of the IRP despite having been assessed as economically non-viable by the PUB in 2014,

“It is good that Manitoba Hydro built no more dams or have no more intentions of that. But I do know that you can't trust Manitoba Hydro because, Conawapa, like the other dams that are not finished yet, we must be wary. Because those are coming also. Because of the climate change in the environment and the environmental impact that water has on all our communities” (JS, OPCN).

And that they could draw on hydro generation whenever needed or useful,

“I believe Hydro will still rely on those devastating impacts in their back pocket, so to speak, as a backup. I mean, backups are good, but if you have an opportunity to spread ...” (LS, OPCN).

63. Indeed, just last week, it was reported in the media that the government indeed had been in the US looking for private investors – in AI data centers but also in Conawapa (Kives, 2026),

“In terms of engagement, we have a regular quarterly meeting with senior officials, including the [Manitoba Hydro] CEO, about future development and all that, and we did ask about Conawapa. And basically what Danroth told us two months ago was right now Conawapa is not feasible, because we can build wind and solar at a fraction of that cost. But we're hearing also that Wab Kinew was talking to Rothschild folks out in New York City, looking at data centers and extracting that kind of data from here and power. And they were actually looking into financing Conawapa...I think that was in the news just the other day.” (CA, FLCN).

64. Yet others indicated that the North will ultimately still end up paying the price of the IRP, even if there was a reduced reliance on hydro-generated electricity,

“It's hard to say either way. All the all the veins of the rivers all lead this way. We're still going to feel the effects from it, all the runoffs and everything. Although it all leads to a river, and the rivers all lead to here. So, either way, we're still going to feel any effect of any anything that goes on down South” (WH, TCN).

Recommendation 3: That Manitoba Hydro assess whether, to what extent, and under what operating conditions, the 2025 IRP would reduce northern hydro generation, reservoir cycling, and water-level fluctuations and identify the management and operating commitments required to achieve those reductions in collaboration with affected northern Indigenous Nations.



Plate 1. Ties that bind (digital art: Robert Spence, 2026)

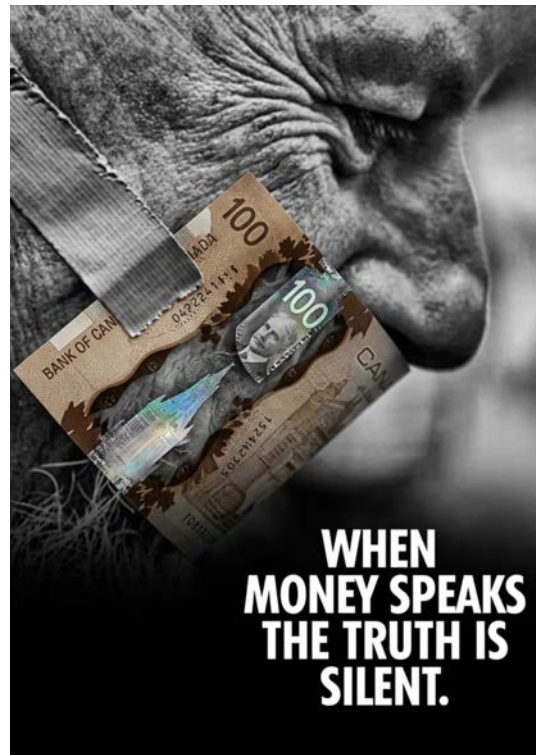


Plate 4. Money and truth (digital art: Robert Spence, 2026)



Plate 6. Money and power (digital art: Robert Spence, 2026)



Plate 5. Lake Sturgeon and water are us (digital art: Robert Spence, 2026)

Reduced environmental burdens and stress on traditional livelihoods

65. The final license regarding the Churchill River Diversion was legislated by the Manitoba government on May 12, 2021 (Government of Manitoba, n.d.; Newbury et al, 1984), this arguably without adequate – some would say any- community consultation (Wa Ni Ska Tan, n.d.). This final license replaced the longstanding ad hoc and annually renewed interim license that enabled Manitoba Hydro to exceed water levels that had been agreed upon in 1975 with extreme adverse implications for the environment (**Plate 1**),

“I don't think there should be no plans of any other generating stations to be built upstream or downstream. I'll say, and we have to find different, different sources of energy to harness, whether it be wind power or solar power. But I feel our Nelson River is stressed, and I can only speak to Nelson River. That's where I grew up” (CC, NHCN).

66. Indeed, fish populations and thus the whitefish fishing industry have been particularly devastated (Hecky et al, 1984; Bodaly et al., 1984). Some participants indicated that a reduced reliance on northern hydro would reduce the need to maximize the production of electricity, especially during peak times in February when energy use in Manitoba is greatest. This would potentially benefit fish spawning and, in turn, the recovery of the whitefish fishery, which in the case of South Indian Lake was once the third most productive whitefish fishery in North America until the Churchill River Diversion was put into operation in 1976,

“If they were able to do that, use alternative electricity to sell to the states or at peak times, and South in the lake, they don't have to bring the water to a maximum where it does a lot of damage. Or bring it down in the winter, where it does more damage to the whitefish eggs, because completely they spawn the shoreline, and then the ice builds up, and then it falls and covers the eggs, and they don't hatch. If they didn't have to use that much water, keep it to say half the capacity, it would help South Indian Lake recover. I don't think it'll never ever completely recover, but it might help a little if they didn't have to raise it five meters or ten.” (DD, OPCN).

67. Alternative energy sources would help mitigate against any further environmental decline in turn benefiting hard-hit northern First Nations,

“I think that alternative energy sources would help create less environmental stress. The First Nation communities are highly effected economically in comparison to those in Winnipeg paying for Hydro.”

WNST Survey, R22 (First Nations, off-reserve)

Such alternatives and an associated decreased stress on the northern ecosystems turn would have multiple cultural benefits for communities, especially regarding the loss of language for local youth,

“There is enough space around northern communities to have geothermal, solar or wind energy. There has been enough manipulation and damage done to our waterways in the north. If one only knew how much of our vocabulary had to do with living by the water and depending on the waterways for travel and for foraging, and for food, you would have a good understanding of loss of language that we’ve experienced. there are literally hundreds and hundreds of words that are used to describe travel on the water. This is what our community has lost. I spoke to a group of over 100 high school students in my community last month and most had not even heard of the words that I shared with them..”

WNST Survey, R17 (First Nations, off-reserve).

68. Another fisher concurred, indicating its implications for a species of “special concern” such as Lake sturgeon that will likely continue to decline and that is of substantial cultural importance (i.e. a cultural keystone species (Embke et al., 2025; Pollock et al. 2015), **(Plate 5)**,

“Why not produce the power that they need for the south in the south and stay the hell out of the north? Because, like Chris Clarke said, it reduces the amount of stress that is being put on our environment over here in the north, especially with what we're seeing happening right now with the rivers and the tributaries and the sturgeon on the lower Churchill River.” (RS, TCN)

69. Reductions in the extreme fluctuations of water levels would reduce dangers associated with collapsing ice that occur each February under peak use and in turn threaten the safety of trappers and other locals who travel by snowmobile but also reduce soil erosion and the prominence of submerged logs or deadheads in the summer and, in both cases, a potential loss of lives (**Plate 2**),

“It hopefully will bring back some of our animals that we've lost and that it also brings hope that we will have no more deaths caused by the hydro logs that float in the waterway. And also hope that our berry picking and our hunting grounds will refurbish in the next 10 years. Yeah, I am happy that Manitoba Hydro will not be doing any more damage to our lakes.” (JS, OPCN).

Recommendation 4: That the implications for a reduced reliance on northern hydro production potentially arising from the IRP and its focus on southern energy should be further designed and documented in collaboration with community through future IRP cycles, especially as it relates to the anticipated resurgence of the traditional use wildlife and plants and commercial fish species and in turn traditional livelihoods and community wellbeing.

5.0 Public Engagement

70. Public engagement has become a key element of environmental and resource management since the 1960s and, more specifically, Integrated Resource Planning. The use of Arnstein's (1969) Ladder of Citizen Participation to help frame engagement was particularly influential in the 1970s and 80s. Arnstein distinguished between "non-participation", "tokenism" and "citizen power", arguing that any participation without an accordant redistribution of power was largely performative (Tritter & McCallum, 2006). Such power imbalances are still pervasive in IRPs, which in Canada, at least, are still largely controlled by utility companies and also the provincial governments because of the 1930 Natural Resources Transfer Agreement to the same (Cutts et al., 2023; Krupa, 2013; Middleton Manning, 2023).

71. The International Association for Public Participation's IAP2 Public Participation Spectrum has been increasingly used by utility companies since the 2000s, a method that is largely technical in nature and less explicitly critical about any underlying power dynamics in public engagement (David & Andrew, 2018). It describes the level of participation according to public influence, this ranging from "Inform" and "Consult" at the lowest end and then "Collaborate" and "Empower" at the highest end of the Participation Spectrum (International Association for Public Participation, 2018). The use of IAP2 acts to describe the role of the public in decision-making without assessing the implications of any underlying power imbalances and what might mitigate against any such imbalances (Nur et al., 2024).

72. In Canadian integrated resource and energy planning, IAP2 has become a dominant tool for governments and utility companies because it offers clarity as to the level of participation although widely criticized because it overlooks any power imbalances. It thus treats the public as a homogenous and impartial process rather than distinguishing among stakeholders and, of special note here, rightsholders when it comes to influence and privilege in decision-making (Baasch, 2023; Rodon & Papillon, 2020). Accordingly, an engagement process may satisfy a general public "consult" threshold while still failing to meaningfully address Indigenous rights, authority, and community-level influence.

73. In its Public Engagement report, Manitoba Hydro described the IAP2 Public Participation Spectrum, indicating its commitment to the low end of the Spectrum,

"The goals and objectives for engagement determine the level of impact the engaged audience will have on decision making. We committed to the "inform" level throughout the process and engaged at the "consult" level where engagement feedback could influence decisions. See Fig 1." (MH Public Engagement, 2025, p4) (**Fig 1**).

74. Yet Manitoba Hydro also argued that this level of participation was both transparent and inclusive,

“Engagement was a core part of developing the 2025 IRP. Following International Association for Public Participation practices throughout the process, supported openness and transparency in energy planning and enabled the consideration of diverse perspectives from customers and interested parties, all of which helped improve project outcomes, ongoing planning and future analyses.” (2025 IRP, p30)

75. As presented by Manitoba Hydro, the public engagement related to the 2025 IRP would provide opportunities for influence as reflected by the solicitation of directed feedback, recognize a diversity of knowledge types, facilitate knowledge sharing, and be both responsive and accountable,

- “Providing meaningful opportunities for influence within the process and to inform decision making.
- Providing inclusive opportunities to participate, recognizing different types of knowledge and interests
- Fostering dialogue of diverse points of view to facilitate knowledge sharing and informed decision making.
- Being transparent and providing clarity on the development and outcomes of the IRP and how feedback was considered and incorporated.
- Being responsive and accountable to feedback shared during engagement.” (2025 IRP, p30-31)

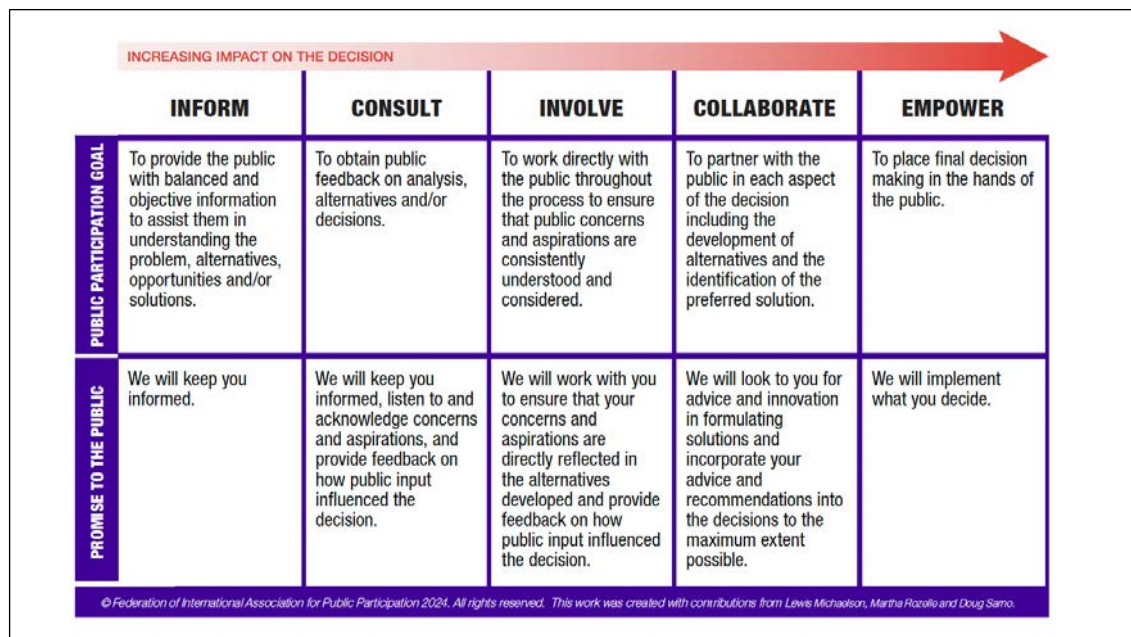


Fig 1. International Association for Public Participation Spectrum of Public Participation as presented by Manitoba Hydro (taken from MH IRP Engagement Report, 2025.Figure 1, p4).

76. Manitoba Hydro, was asked by the Board in the first round of information requests to explain how and why it decided upon “inform” and “consult” levels on the IAP2 Spectrum,

Question:

“a) Please explain Manitoba Hydro’s decision to engage at the “inform” and “consult” levels on the IAP2 spectrum.” (PUB-MH I-79a-c, p1)

In its response, MH indicated that it had been “carefully considering” what levels of public engagement it would undertake including any potential for influence and its own vision and principles,

“A) Manitoba Hydro determined that “inform” and “consult” levels were appropriate by carefully considering the potential to influence decision-making at various stages of the process, the needs of the audiences, and Manitoba Hydro’s vision and principles for engagement...” (PUB-MH I-79a-c, pp1-2).

77. Manitoba Hydro further indicated that its selection of the lowest levels of participation was justified, in part because they were realistic and achievable and thus “transparent” and “credible”,

“...It is more transparent and credible to select a lower level on the spectrum, than to overpromise influence that cannot be delivered. Manitoba Hydro felt confident that we could deliver “inform” and “consult” levels of engagement for steps within the IRP development process.” (PUB-MH I-79a-c, p2).

Yet to use an analogy, “low-hanging fruit are not worth picking if spoiled”. Indeed, other criteria besides convenience – and control - should be employed when deciding on approaches to engagement.

78. This view was further reinforced by Manitoba Hydro’s response to the WNST-MH I-6 Information Request, which indicated that it was better to perpetuate the status quo, however inadequate, rather than to explore ways in which further engagement might actually be facilitated,

“...IAP2 guidance emphasizes the importance of never compromising the promise to the public. It is more transparent and credible to select a lower level on the Spectrum, than to overpromise influence that cannot be delivered. Manitoba Hydro felt confident that we could deliver “inform” and “consult” levels of engagement for steps within the IRP development process.” (WNST-MH I-6 p2).

How can any organization be sure that outside influence cannot be “delivered”. The limiter in this process is not the outside stakeholders and rightsholders but rather the deliberate decision on the much more influential utility company not to meaningfully open up the engagement process to be more inclusive and equitable.

79. Importantly, their response indicates that Manitoba Hydro will continue “leveraging” the IAP2 Spectrum in future engagement planning, without any commitment to facilitating more impactful and less utility-controlled approaches to public engagement further along the Participation Spectrum,

“Manitoba Hydro will continue to support the energy transition in Manitoba through near-term actions, ongoing engagement, and future planning. Engagement builds upon previous engagement and relationships, providing an opportunity to further understand and consider the concerns, knowledge, and aspirations of engaged audiences. Planning for future engagement activities will continue to leverage the IAP2 Spectrum when selecting the appropriate level of engagement. See Page 72 of Attachment 1.1 - 2025 Integrated Resource Plan for more detail around these next steps.” (WNST-MH I-6 p2).

80. Manitoba Hydro was asked by the Board how it differentiated its level of engagement as it related to “inform” and “consult” on certain matters,

“b) Please explain how Manitoba Hydro determined when engagement feedback could influence decisions such that it would engage at the level of “consult” instead of “inform” (PUB-MH I-79a-c, p1)

They described a process where opportunities for information sharing and technical and logistics feedback would be identified and sought after,

“b) Manitoba Hydro determined when engagement feedback could influence decisions, thus suggesting a “consult” level of engagement, by working through the various decisions in the IRP process that could be informed by the input of various audiences. This involved discussions between engagement practitioners and IRP technical staff to build a shared understanding of the areas where decisions could be influenced, as well as important project management considerations such as available resources, potential techniques, and time available in the project schedule.

As an example of how such feedback was obtained and used was provided,

“...in Round 1 Engagement of the 2025 IRP, it was noted that feedback should be sought on key inputs and scenarios. This indicated the opportunity for the feedback shared to influence these elements of the IRP (a ‘consult’ level of engagement)...”

81. Highly problematic in its own right, such self-serving approaches to public engagement are indefensible and - arguably unconstitutional - when dealing with rightsholders in a Canadian context (Stacey, 2018; Dubrule et al., 2018). Although far from ideal, the IAP2

justification offered (that it is more transparent and credible to promise less than to overpromise or aspire to influence) is perhaps defensible as a general principle when uniformly directed to every audience stakeholder group. However, it produces a structurally inappropriate outcome for communities whose relationship to Manitoba Hydro is fundamentally different from that of the general public as defined under the Canadian constitution and UNDRIP.

Recommendation 5: That made-in Manitoba approaches to public engagement be developed for future energy planning rather than relying on generic and largely inadequate templates like the IAP2 and that more adequately reflect the often-unique challenges but also opportunities when it comes to energy planning in this province.

Inform vs. Consult on the TAC

82. Some of the public presentations took place very late in process long after it would be able for the public to contribute to the conceptual development of the IRP,

“I feel like they did a few public presentations in December before the report came out in February. It's too late to really meaningfully impact anything.”

[TAC1]

Such observations confirm that public presentations, which from November 8 – December 2, 2024, only a year before the final report was released in February 2026. occurred after most if not all planning decisions were effectively finalized and effectively represented opportunities for educating the public about the anticipated 2025 IRP. Thus it seems that the general public had little opportunity to inform the process, outside of the tightly controlled processes represented by the R1 and R2 surveys. (IRP Engagement Report 2025).

83. The main vehicle for any sought-after feedback on the part of Manitoba Hydro was the Technical Advisory Committee (TAC), which met eight times from 2024-2026. Yet even this technical engagement had major shortcomings as reflected by meeting notes and our interactions with TAC members.

84. Three members of the TAC were approached about being interviewed, and while two felt comfortable discussing their experiences only one felt comfortable being formally interviewed. This in part because it would be hard to ensure confidentiality given the small number of non-Hydro members involved in the TAC.

85. Most of the comments here reflect patterns that will be used to distinguish the two least inclusive stages on the Participation Spectrum, where it seems that many of the interactions approached one-way transmission of information rather than equitable knowledge exchange much less active collaboration.

86. Such limited opportunities for multi-way engagement characterized many of the TAC meetings as reflected for example in the first TAC meeting when the mandate of the TAC was being defined and clarified. From this summary note, it is clear that only very specific feedback was sought after, this focused on key aspects as defined by Manitoba Hydro,

Member feedback: *“There was a discussion about the type of input and feedback that would be sought from committee members.”*

MH response: *“the committee’s role is to provide feedback and input to inform key aspects of the 2025 Integrated Resource Plan (IRP) development process, but they will not be recommending a development plan.”* [TAC Meeting #1, 08/11/2024, p751].

87. There were further questions as to whether or not this interaction represented engagement vs. Crown Consultation, despite the presence of two and then eventually one Indigenous member on TAC,

Member feedback: *“TAC members suggested that the purpose of the committee should be clarified, specifically whether it is an engagement effort or considered Crown Consultation.”*

MH response: *“the purpose of the TAC is engagement and that it would be clarified within the final Terms of Reference that TAC meetings are not Crown Consultation.”* [TAC Meeting #1, 08/11/2024, p752]

That such interactions with TAC members who represented Indigenous organizations also clarifies that the interviews with members of First Nations reflected in this report should similarly not be seen as formal Crown Consultation.

88. From those same meeting notes, there were questions whether or not these TAC meetings might respond or contribute to policy, but which was seen as out of its jurisdiction by Manitoba Hydro,

Member feedback: *“Members asked how and if these key planning assumptions would both respond to and influence policy.”*

MH response: *“It was noted that MH does not have jurisdiction to author policy, but the IRP is informed by policy made or considered by all levels of government.”* [TAC Meeting #2, 21/11/2024, p759]

There were also questions as to whether or not any substantive changes had been made to the IRP based on their feedback, which seemed from the meeting notes at least to be limited to technical matters such as load sensitivity in modelling,

Member feedback: *“Members asked for more information on any substantive changes that were made based on engagement feedback, with some noting that*

they were expecting to see more significant changes to the modelling assumptions and reconciliation value theme.”

MH response: “It was noted that discussions around economic reconciliation are ongoing with interested parties to support the development of metrics for economic reconciliation. Engagement feedback also led to the development of a load sensitivity that would be presented in the next section.” [TAC Meeting #6, 07/04/2025, p778].

89. The TAC member who was interviewed also communicated their frustration that the assumptions that underlay the modelling were never meaningfully up for discussion, in this case an assumption underlying the main models that there would always involve a natural gas turbine,

“...the three major models that they ran all involved, for example, the gas turbine, so you know there's certain things that's really clear that were decided regardless of anything else...there's not even like your quote unquote control version, if you will, like. Spending \$3 billion on a gas turbine is huge, huge. And the fact that it just seemed to be a foregone conclusion. That that's something that had to happen doesn't sit right with me, given the, the how expensive it is.” [TAC1]

90. This observation seems to directly contradict Manitoba Hydro's claim that engagement feedback shaped the recommended development plan and instead suggests the assumption that the IRP would always involve a turbine pre-dated the modelling exercises,

"Combustion turbines are the dispatchable capacity resource used to follow load. Balancing cost and reliability, modelling consistently selects natural gas." [TAC Meeting #6, 07/04/2025, p645]

All ten potential development plans and all three of the final plans included combustion turbines (Figure 10, 2025 IRP Final, p 47).

91. Predictably there were concerns regarding the emissions objective of the 2025 IRP and whether it targets absolute zero by 2050,

Member feedback: *“There was a discussion about the load projections showing only a 50% decrease in natural gas usage, not reaching absolute zero emissions by 2050, with carbon extraction methods like direct air capture being considered after 2050.*

” MH response: *“the objective within the 2025 IRP is to study net-zero economy by 2050 and that absolute zero is not the objective.”* [TAC Meeting #1, 08/11/2024, p752].

92. As another indication of the lack of value placed on their input was that none of the TAC members, other than MH staff, were adequately remunerated for their time and active commitment to this engagement process,

“I was just thinking that something we did not cover in our discussion is the fact that no one on the Technical Advisory Committee was compensated outside of receiving lunch. Consider how much the Hydro folks in that meeting are making....” (TAC1)

93. indeed, the timeframes for the IRP were never transparently disclosed much less discussed,

“...it wasn't clear to me when it switched from being a plan to 2050 to being a 10 year plan, that was something that I was like, oh, when did this happen, so I don't know if that was me not paying close enough attention or me not being like it being highlighted appropriately to like fully pick up on...” [TAC1].

94. Although lumped together by the IAP2, two levels of consultation commonly occur. One, this used exclusively by Manitoba Hydro, in which information already deemed important by the utility company is sought after, most of this technical in nature. And then a second more inclusive level of consultation in which openness to ideas from interested parties are sought after and then addressed in meaningful ways. To our knowledge, this second level of consultation was rarely if ever employed by Manitoba Hydro in any of its engagement activities, including the TAC.

95. When evaluating all the TAC meeting notes, some patterns and categories of engagement emerged. The most pervasive category, “provision” was the mostly one-way provision of information, often only provided at the meetings themselves rather than beforehand when the TAC members would have to simultaneously make sense of what was being shared and respond in an effective manner,

“...people are giving you the information at the same time that they're expecting you to answer it. Some stuff came to us in advance, but I do think that it's that reflection period often isn't built in to these things, so in some ways it's like do the talk time and a week later do the discussion time, like do the presentation, and in some ways there should be two separate things to both give people the opportunity to digest, but also to talk to their communities.” [TAC1].

96. A second category of engagement was an “affirmation” of ideas where there was agreement between Manitoba Hydro and TAC members. A third “performative” category reflected ideas that seemed to be well received, although later exchanges showed that they had not been accepted and explanations were then proffered by staff members as to why. A fourth category was an often-cautious “skepticism” to any ideas that were provided by TAC members that ran contrary to Manitoba Hydro priorities, where explanations about why ideas were not likely to be adopted. And a fifth and final category was outright

“rejection”, when ideas were simply turned down because of their outright lack of feasibility or suitability.

97. It should be noted that no recordings were made of the TAC meetings, or at least none were provided by Manitoba Hydro. Thus, any of the above insights are restricted to summary notes taken by Manitoba Hydro staff. While they are still useful, they are likely biased or at least sterilized by more senior staff members and likely would be distinctly different in tone and content if this function was provided by an independent note taker or even some of the other TAC members, say on a rotating basis.

Recommendation 6: That Manitoba Hydro explore ways of shifting its engagement activities along the participation gradient to include collaboration if not empowerment. This would especially be the case for its Technical Advisory Committee and the recently announced Indigenous Advisory Circle whose mandates as “advisory” appear to be restricted by Manitoba Hydro.

6.0 Indigenous Engagement

“Looks good on paper, but will it happen? Will we see results? I am very pessimistic when it comes to Manitoba Hydro promises.”

WNST Survey, R17 (First Nations, off-reserve).

98. Under Section 4.2.2, Our Commitment to Indigenous Relations, Manitoba Hydro indicated,

“As a predominantly hydroelectric utility, our past and our future are inextricably intertwined with Indigenous Nations and communities who have a strong cultural and spiritual connection to the lands and waters since time immemorial. We acknowledge the impacts of our projects and operations and are committed to working collaboratively to strengthen and improve our relationships with Indigenous Nations and communities as Manitoba’s energy future unfolds. We support the advancement of reconciliation in Manitoba and will continue to engage with Indigenous Nations and communities in our future energy planning process and community-led energy planning.” (2025 IRP, p 25, emphasis added).

99. In part at least, Indigenous engagement was achieved through the use of the (ironically named, for northern Indigenous communities at least) consultant - Urban Systems Ltd - as a “neutral intermediary” in the IRP.

100. It is unclear what Manitoba Hydro means by “neutral” since they are clearly working for and being paid by the crown corporation to deliver on its IRP-related priorities. Either

this consultant conducted a poor job of public engagement and should be criticized as such, or they did an excellent job as directed by their employer, Manitoba Hydro. The outcome though is still among worst practices in public engagement, especially when it comes to Indigenous engagement.

101. Indigenous engagement is at the core of this report and focuses on how Manitoba Hydro has engaged with communities in the past and present as related to the 2025 IRP and what might change in this regard in future iterations of the IRP and for other relevant energy related engagement. Although most of what was shared focused on how poor Manitoba Hydro's record is in this regard, that was not exclusively the case.

102. The issue that this author has to contend with is that there was little-to-no-engagement with any Indigenous partners, especially at the grassroots level as reflected in our interviews. Thus, like the outcomes of the R1 and R2 survey, insights reflected through these interviews indicate how ineffectively Manitoba Hydro has engaged and continues to engage with communities, when it does at all. And thus provides valuable insight into what should be avoided in future iterations of the IRP as well as recommendations as to how to best proceed in this light,

“There has been no communication from Hydro regarding their future plans, so I cannot say if they have my best interests or not when making their future plans.”

WNST Survey, R14 (Non-Indigenous)

103. Indigenous participants in our outreach were far from uniformly critical of the IRP - although they clearly had concerns. Instead they welcomed the shift to electricity production in the South and hoped that this might reduce at least some of the hydro-related burdens that they still regularly encounter. These and other insights reflected in this report would only become apparent to Manitoba Hydro if they shifted their engagement activities away from the “non-existent” or “information provision” engagement frames reflected in the IAP2 Participation Spectrum.

104. Thus, if Manitoba Hydro shifted its Indigenous engagement from the information and inadequate-consultation frames on the IAP2 Participation Spectrum towards collaboration and perhaps even empowerment as is indicated by many participants, better relationships would ensue between the crown corporation and First Nations, resulting in benefits for everyone involved in the IRP and beyond.

105. Manitoba Hydro recognizes that such relationships are important for the public but also for Indigenous Manitobans although it does still only emphasize “understanding the evolving energy needs” rather than actually responding to and accommodating energy “needs”,

“Improving engagement & enhancing relationships

...Manitoba Hydro affirmed its commitment to respect and support Indigenous peoples in all aspects of its business, including working to understand the evolving energy needs of Indigenous Nations.” (2025 IRP Public Engagement Report, p iv).

106. The ongoing defensiveness and lack of meaningful exchange of priorities and ideas with Indigenous communities will only undermine any future energy planning. This places the term reconciliation, which although affirmed in the IRP, almost entirely in an economic context, thus restricting it from becoming more than a convenient but ultimately shallow concept. As is often shared with me: “there is no reconciliation without truth”.

107. Ultimately no one we interviewed from these northern communities had previously heard of the 2025 IRP, although some had seen coverage of the gas turbines in the media. Only one of the 16 had heard directly from Manitoba Hydro about these issues, although not the actual IRP and albeit at the highest levels of leadership – for the corporation and this First Nation alike.

Interested Parties and Indigenous engagement

108. As part of their public engagement, Manitoba Hydro identified possible Interested Parties that might become involved,

“For the purpose of the IRP, Interested Parties are any individual or group with a representative voice and demonstrated interest in participating in the development of the 2025 IRP” (WNST-MH I-4, pp1-2).

109. The preamble to WNST-MH I-4 observes, without contradiction from Manitoba Hydro's response, that summary reports identify only three recognized Indigenous organizations among 288 participating Interested Parties,

“Indigenous Nations and organizations are a named category among those stakeholders invited to “Interested Parties” engagement opportunities. Manitoba Hydro indicates that the Assembly of Manitoba Chiefs, MKO, and the Southern Chiefs, “along with several other Indigenous organizations” were invited to broader Interested Parties engagement opportunities (Appendix A, p.299) Summary reports name only three recognized Indigenous organizations out of 288 participating “Interested Parties”, namely: the Indigenous Chamber of Commerce (Appendix A, p.157), Southern Chiefs Organization (Appendix A, p. 248), and Manitoba Metis Federation (p. 296).” (WNST-MH I-4, p1).

110. Two additional Indigenous Nations or organizations received email notifications through their TAC membership, with encouragement to share the invitation. Beyond email notification, the record contains no description of active steps taken to support or secure Indigenous Nations' attendance at IP sessions, and no attendance data disaggregated by Indigenous Nation participation have been produced by Manitoba Hydro.

111. The combined effect of these three evidentiary points is that Manitoba cannot demonstrate its Interested Parties process meaningfully reached northern and remote Indigenous communities. Six email invitations to Indigenous Nations or organizations, against a participating base of 288 Interested Parties, does not constitute an outreach structure designed to overcome the historical, geographic, financial, and capacity related barriers facing the communities.

112. The absence of active attendance support beyond notification, and the corresponding absence of any disaggregated attendance data, leaves no basis to conclude that participation was achieved rather than merely invited. Manitoba Hydro's admission that resource and schedule constraints partly drove its IAP2 level selection confirms that the engagement design was calibrated to internal project management considerations, not to the needs of the communities least positioned to participate without support. The implication of this is that the Interested Parties process, on the record as produced, does not establish that Manitoba Hydro's engagement approach was appropriate for Wa Ni Ska Tan's constituency.

Limited and non-attributable engagement with First Nations leadership

113. The preamble to WNST-MH I-3 identifies that MH conducted interviews with the Manitoba Metis Federation.

“Manitoba Hydro indicates that it conducted interviews with the Manitoba Metis Federation (Appendix A, p. 332) but there is no indication it conducted interviews with First Nations leadership (Appendix A, pp. 299-300).” (WNST-MH I-3, p1)

However, there is no indication it conducted structured interviews with First Nations leadership (Manitoba Hydro's response does not dispute this characterisation). Instead it confirms that the engagement format used with First Nations was a tailored community workshop rather than a structured interview.,

“In the case of First Nations, Manitoba Hydro followed up with individual Nations that expressed interest in further engagement on energy planning. The format of this engagement was a workshop with community leadership, tailored to the topics of interest identified by the individual communities, rather than a structured interview. These topics of interest included the IRP, as well as a range of community-specific energy-related issues. In some cases, workshops were facilitated by an external engagement consultant, and in other cases, they were facilitated by Manitoba Hydro directly. To ensure leadership could fully participate and share their perspectives, Manitoba Hydro committed that their opinions and perspectives would not be shared or published in a way that would be attributable to any Nation. At this time, Manitoba Hydro is continuing to follow up with the Nations that expressed interest through the most recent First Nations Leadership Survey.” (WNST-MH I-3, pp1-2)

114. Importantly, MH committed from the very start that the opinions and perspectives shared in those workshops would not be shared or published in any way that was attributable to any given Nation, as confirmed above. That commitment means whatever First Nations communicated in their engagement with Manitoba Hydro is absent from the evidentiary record. It cannot be cited, tested, or shown to have influenced any planning assumption or evaluation outcome beyond generalizations. The issue here isn't confidentiality, which can be a legitimate design choice, instead, it is about the structural consequence of that choice for the quality of the evidentiary record: where community-specific input from hydro-impacted northern First Nations is concerned, the record is empty as the result of deliberate design choices.

Constituency-specific input and Manitoba Hydro's evaluation framework.

115. Even if the engagement process had reached Wa Ni Ska Tan's constituency, in this case Indigenous Nations, more broadly and in a more attributable format, the evaluation framework into which engagement results fed offered no pathway for constituency-specific concerns to affect the recommended development plan. As established by Manitoba Hydro,

“a) Manitoba Hydro's evaluation methodology considers evaluation themes equally for the 2025 IRP as opposed to weighting them. These evaluation themes reflect an IRP objective to assess trade-offs across reliability, cost, environmental, and socio-economic impacts. The output of the evaluation process was the shortlist of potential development plans. Treating the themes equally was appropriate as it avoided introducing complexity without adding value while narrowing to the shortlist of potential development plans that underwent further analysis. Feedback from engagement (specifically the customer survey report, PDF page 64 of the 2025 IRP Engagement Report Appendix A in Attachment 1.2) showed that customers value all of the themes and that reliability consistently ranked highest.” (PUB-MH I-68a-f, p3)

116. The four evaluation themes (reliability, costs, environment, and socio-economic) were considered with equal weight, and each metric within a theme was treated equally within said theme. This is corroborated by MKO-MH I-1 which establishes that reliability was the most important factor to Manitoban's as well as confirms that all four of the evaluation metrics were weighted equally,

“Documented in Section 4 (What We Heard and What We Did), Sub-section 4.1.4 (Evaluation Themes and Metrics) as “Indigenous Nations are concerned about caring for the environment while meeting energy demands. System reliability is important in rural and remote areas. Respondents noted that improving existing service connections would help to minimize future outages.” (MH 2025 IRP Engagement Report, p29)

“Manitoba Hydro did the following based on the feedback: While we heard that reliability was the most important factor to Manitobans, the evaluation metrics [reliability, environmental, cost, socio-economic] were weighted equally when assessing the trade-offs between potential development plans” (MKO-MH I-1, pp 2-3).

117. Indeed, reliability was deemed as important it many of the open-ended responses to the WNST survey indicated that outages occurred frequently and with great impact (see also **Plate 3**)

“We, in northern communities of Manitoba, have had countless power outages. Our expectations of power outages are disturbing and very rampant.”

WNST Survey, R11 (First Nations, off-reserve)

Service for these and for installations often were delayed, sometimes for multiple months

“Hydro takes long to power up the new units. Had to wait 8 months for one of the buildings to get hooked up. Power outages in the northern communities takes days to be restored.”

WNST Survey, R41 (First Nations, off-reserve)

Such outages had adverse implications for food security and wellbeing,

“Because I have to be without hydro for 72 hrs in order to be considered for reimbursement of spoiled food.”

WNST Survey, R48 (First Nations, off-reserve)

Yet relative to other identified priorities was among the lowest ranked, indicating the wide diversity of important energy-related challenges that confront Indigenous communities

118. The socio-economic theme contained two sub-metrics: Economic Reconciliation and Economic Opportunity. The equal weighting of each of the themes and the respective sub-metrics resulted in Economic Reconciliation and Economic Opportunity each making up 1/8 of the total evaluation framework. Additionally, PUB-MH I-68a-f establishes that Manitoba Hydro considered alternatives to the above-mentioned equal weighting methodology, such as the use of a numerical weighted system,

Visiting the cabin becomes challenging due to Manitoba Hydro's water release, resulting in getting trapped in slushy water



Plate 2. Threats to safety associated with peak use of electricity in February (photo credit Angela Blacksmith, 2026)

As children swim, they are surrounded by a multitude of wheats and zebra mussels, leading to rashes and cuts caused by the low water.



Plate 7. Kids playing on a beach (photo credit Angela Blacksmith, 2026)

We previously experienced a power outage that was temporarily rectified, but this year, a community-wide power outage occurred due to the failure to resolve the issue. This resulted in evacuations, with many residents still displaced. Community members using generators faced challenges with gasoline and equipment fai... more



Plate 3. Community evacuation because of electricity outage Angela Blacksmith, 2026)

“e) Manitoba Hydro considered the use of a numerical, weighted scoring methodology as part of the IRP evaluation process but ultimately determined that such an approach would not improve decision-making for the 2025 IRP. Manitoba Hydro adopted an evaluation approach that emphasizes robustness, transparency, and comparability rather than numerical optimization. This approach enables identification of development plans that perform well across multiple criteria and load projections, without relying on weighted scoring schemes that could convey unwarranted precision or obscure the basis for decision-making.” (PUB-MH I-68a-f ,p4)

119. Manitoba Hydro’s justifying the decision not to weigh the evaluation criteria on the basis of it not being readily quantifiable is problematic. Because this explanation, while persuasive given the chosen evaluation criteria, provides no basis to believe that they considered alternative methods of evaluation that could be weighted to better reflect Manitoba Hydro’s various constituencies, (MH I-68a-f, pp4-5)

“Many of the evaluation criteria, including those related to environmental performance and socio-economic considerations, are not readily quantifiable on a comparable numerical scale. Applying precise numerical scores and weights to these diverse metrics could imply a level of analytical certainty that would not be supported by the underlying data...” (MH I-68a-f, pp4-5).

120. The practical consequence of this dismissal of such “diverse metrics” that were not readily quantifiable means that the socio-economic considerations – and indeed the kinds of lived experiences and insights reflected throughout this report - were effectively excluded or dismissed. Insights that were most relevant to Wa Ni Ska Tan’s constituency were assessed with the same weight as every other planning criterion, with no mechanism in place to give weight to reflect the constituency’s direct exposure to the IRP’s consequences.

121. Moreover, neither metric (economic reconciliation, economic opportunity) contained criteria for geographic access, remote infrastructure issues, distributional impact across types of communities, or any barriers specific to northern and Indigenous communities when it comes to participating in energy efficiency or demand-supply programs. The evaluation framework was explicitly designed not to assign numerical weights to criteria that Manitoba Hydro considered non-quantifiable. The consequence, for Wa Ni Ska Tan’s constituency, is that the concerns most relevant to their circumstances had no designated place in the evaluation scoring.

Socio-economic themes (economic reconciliation and economic opportunity) and rightsholders input

122. The inadequacy of the evaluation framework is compounded by the evidentiary record’s complete absence of any documented Indigenous input regarding either of the two socio-economic metrics that did exist. Ironically, this even include the idea of

economic reconciliation, which is criticized for its widespread strategic use by governments, industry, and in this case utility companies to reframe any reference to outcomes that might have economic benefits for Indigenous communities as “reconciliation”.

123. Indeed, over the past two years there has been an upsurge in the visibility of “economic reconciliation”, defined as the “economic redress of historical injustice of Indigenous people in Canada” (Colbourne et al., 2023; Henkeman, 2021). Joint investments and partnerships with Indigenous communities are increasingly celebrated in investment circles (Kung et al., 2022) and in energy sector (Lim et al., 2024), particularly in oil and gas (Kung et al., 2022) and now mining in critical minerals (Scott, 2025) as Canada transitions towards net-zero emissions. Although the need for economic growth and prosperity in Indigenous communities is undeniable (Colbourne et al., 2023; Lim et al., 2024), many question the scale of these projects, arguing that they will continue to devastate traditional livelihoods and environments alike (Scott, 2025). Such neoliberal reform will do little to support communities in their struggle against colonialism and for equity and justice (Colbourne et al., 2023; Scott, 2025).

124. WNST-MH I-9 established that no additional socio-economic metrics beyond Economic Reconciliation and Economic Opportunity were considered for the 2025 IRP,

“Additional metrics for the socio-economic theme were not considered for this IRP. Applying the evaluation metrics to the potential development plans to assess trade-offs was new to the 2025 IRP. Through engagement it was confirmed that the proposed evaluation themes and metrics were generally seen as appropriate and can be built upon for future IRPs. Additionally, Manitoba Hydro commits to providing timely and meaningful engagement and communications on future projects as they are identified.” (WNST-MH I-9, p1)

125. Indeed, this question explicitly identified examples of other criteria that were identified by engagement with northern Indigenous communities including health and wellness, community infrastructure, traditional livelihoods, cultural resilience, and equity that might have also been included,

“Were additional metrics considered for the socio-economic theme besides Economic Reconciliation and Economic Opportunity, and, if yes, why were they not included? Possible examples of other evaluation metrics raised during public engagement include health and wellness benefits and/or risks (Engagement Report, p.28). Other examples include local value creation, community infrastructure, subsistence and livelihoods, cultural resilience and heritage, equity, among others.” (WNST-MH I-9, p1)

Although these issues were indeed raised at TAC meetings for possible inclusion as criteria, none of these was considered much less incorporated into the IRP framework.

Manitoba Hydro's response does not dispute that these concerns were raised, it confirms only that they were not acted upon. As indicated below in this TAC meeting,

Member feedback: *“A member asked if any changes have been made to the resource characteristics that were shared with members since meeting #4, and if characteristics such as social acceptability and technology readiness were added.”*
 MH Response: *“the characteristics have not changed since they were last shared, but that these considerations will be part of the evaluation of the potential development plans. It was noted that the model is quantitative, and that the evaluation step will be used to consider the more qualitative aspects, and that there is always interest in evolving the resource characteristics in future iterations of the IRP.”* [TAC Meeting #6, 4/7/2025].

126. When asked what specific feedback Manitoba Hydro received on the Economic Reconciliation metric from Indigenous rightsholders, and how that feedback was incorporated, Manitoba Hydro confirmed that TAC meeting notes were designed to summarize discussions without attributing feedback to any individual or group, and therefore attribution to Indigenous rightsholders is not possible,

“The feedback that Manitoba Hydro received on the proposed economic reconciliation metric was primarily through the Technical Advisory Committee (“TAC”). Interviews related to the economic reconciliation metric specifically were also pursued and undertaken with interested Indigenous Nations/organizations. As documented in CC-MH I-59-a-d, TAC meeting notes were prepared and shared to provide a summary of the TAC discussions without attributing feedback to a specific individual or group, and therefore attribution to Indigenous rightsholders/stakeholders is not possible. Wa Ni Ska Tan-MH I-2 outlines that Manitoba Hydro treats all information received during the engagement process as confidential...” (WNST-MH I-10, p1)

Interviews on the economic reconciliation metric were also conducted with interested Indigenous Nations, but those interviews are treated as confidential, and no non-confidential summary of their content or influence on metric design has been produced. Similarly, none of the summary notes indicated that any discussion had taken place regarding any of these priorities had been considered for the socioeconomic or the economic reconciliation metrics.

127. The result is a complete evidentiary gap, at least when it came to making these experiences accessible to the interveners in the IRP hearing. The one evaluation metric nominally designed to reflect the interests of communities like Wa Ni Ska Tan's constituency cannot be shown to have been shaped by any traceable input from those communities. Manitoba Hydro's claim that engagement confirmed the metrics were appropriate cannot be verified, because the engagement that could have supported that confirmation was designed to be non-attributable. Even the notes that documented

the TAC meetings were summaries taken by Manitoba Hydro staff and are thus of little evidentiary use. Under ToR Q1, the question of whether Manitoba Hydro's planning objectives were appropriate cannot be answered affirmatively where the planning process contains no mechanism for confirming that the communities most affected by the plan actually had their input considered and incorporated.

Technocentric and reductionist approach to risk management

128. The inadequacy of public engagement is not confined to its procedural consequences. As established in PUB-MH I-8a-g, engagement results from the 2025 IRP were incorporated into load projections in aggregate form only, with no geographic or community-level nuance,

“b) Manitoba Hydro did not assign probabilities to individual load projections in the 2025 IRP. Rather, the 2-Medium load projection provides an appropriate planning basis for developing a resilient system under uncertain load growth...” (PUB-MH I-9 a-g, p3)

There were thus no probabilities assigned to individual load projections. Reinforcing the lack of community, geographic, or community-level nuance within their modeling.

129. Instead only general insights that had already been identified (e.g. reliability, affordability) that were ostensibly cherry picked from a wide diversity of priorities and concerns documented in the public outreach were reflected (reliability, affordability) because they are important to Manitoba Hydro whereas others (e.g. environmental impacts, net zero) were referred to but arguably excluded from any subsequent treatment,

“e) Engagement from the 2025 IRP showed themes that were broadly consistent with the 2023 engagement. Customers continued to emphasize the importance of reliability, affordability, as well as environmental, and socio-economic impacts. The latest engagement reinforced the themes identified earlier and confirmed that customers expect Manitoba Hydro to plan for a future with increasing electrification and changing energy use, while managing risks prudently.” (PUB-MH I-9 a-g, p4).

130. Manitoba Hydro's response notes such themes without any indication that northern community-specific input on energy access, community led energy, or infrastructure was at all taken into account aside from being dissolved into the general engagement data. This dissolution of northern specific interests into general engagement data reflects not only a technocentric approach, but also an urban centric one as the majority of the engagement data came from urban Manitobans and were generalized to all ratepayers in the province,

“Member feedback: “The committee discussed how different demographics and regional considerations are incorporated into the load projections.”

MH response: “the load projections are displayed as an entire provincial load based on averages, rather than higher and lower end users or different demographics. This includes northern Manitoba end users’ data which is aggregated in the total averages with the exception of off-grid communities which are not included within the load projections shown.” [TAC Meeting #1, 08/11/2024].

131. Isolation of off-grid and northern communities, including their place in the load projections and their reliance on diesel generation was noted. Barriers compromising access to energy in such Nations are acknowledged, but any feedback on the part of the TAC members was not pursued much less integrated,

“Member feedback: “A member noted the four off-grid communities shown on the Major Facilities diagram.” MH response: “Due to their off-grid locations, four northern communities are not connected to the MH transmission grid and are reliant on diesel generated electricity supplied by MH. The four communities are: Shamattawa (Shamattawa First Nation), Tadoule Lake (Sayisi Dene First Nation), Brochet (Barren Lands First Nation), and Lac Brochet (Northlands Denesuline First Nation).” [TAC Meeting #4, 31/01/2025].

132. Similarly, Manitoba Hydro indicates that population growth, economic development, and electrification trends for Indigenous customers and communities are implicitly captured through regionally differentiated demographic inputs, without specific acknowledgment of the distinct trajectories of northern and remote communities,

“Manitoba Hydro’s load projection reflects anticipated changes in electricity demand across all customer classes, including Indigenous customers and communities, over the planning horizon. Population growth, economic development, and broader electrification trends are implicitly captured through regionally differentiated demographic and economic inputs used in the forecast.” (WNST I-18, p2).

133. This approach of implicitly capturing the anticipated changes in energy demand through regionally differentiated demographic inputs does not factor in the varied needs of communities whose energy demands are shaped by factors including housing conditions, grid reliability, and community energy initiatives that differ materially from the provincial average.

Additional risks not anticipated by the Order in Council (12/2026)

134. Although a number of risks and uncertainties were explicitly identified by the Order in Council (Q#11, 12/2026) including “ market risk, economic risk, climate risk, political risk and technological risk”, the question was broader in approach asking, “what are they key risks and uncertainties in Manitoba Hydro’s IRP and have they been appropriately

addressed and mitigated”? (p3). Indicated below are relevant uncertainties and risks that were not explicitly anticipated by Manitoba Hydro or by the OIC (12/2026).

Traditional livelihoods

135. Few hydro-impact communities on the inland lakes and rivers retain their freshwater fishing industries, in part because of the widespread decline in fish stocks and questions about the health of any remaining populations. Such impacts are often quite dramatic and can last for generations,

“Well, the shoreline erosion, sedimentation, the altering of fish habitat, altering of fish waterfall, everything, everything's affected, and you know, nowhere. When, when our nation was one of the, one of the, what's called signatories to the master implementation agreement, nowhere in the agreement says it was going to alter the way we live, it was going to alter the well-being of our people. Nowhere did it say that it was going to affect the fishery, impact our livelihoods, and you know that's what we're seeing and dealing and living with today.” (CC, NHCN).

Health and safety

136. Some interviewees felt that any implications of the IRP for community health remain unaddressed. Hydro generation has had substantial adverse implications for affected Indigenous communities including but not restricted to increased levels of contaminants, decreased access to healthy traditional and nutritious foods, safety of local transportation, gendered violence and increased access to and abuse of alcohol and drugs (Monaco, 2023; Koutouki et al., 2018),

“ Where does the health of the people come in? In all of this, you can't separate the people from the environment, because the people live around the environment. When does that topic of discussion come into play here, or does it even.?”(RS, TCN)

137. There was no mention of either health or wellbeing in the 2025 IRP, which has been in short decline over the last 40 years and is at least in part associated with changes in water levels and its implications for animal and human health,

“It's fine and dandy when it's written on the paper like that, when we know that the corporation and the government only looks at the health of the economy, that's what we think that they're talking about when they're talking about health, the health and well-being of the common economy surrounding the corporation and the government of Manitoba...I f they were really worried about the health of the people in the First Nations around the environment, that the impact we would have had several billions and billions of dollars worth of resources here available to us to help our people out

of the slump that we've been in for forever, since Manitoba Hydro development took over our territory.” (RS, TCN)

138. One of the interviewees identified the ever increasing need for and restrictions in access to treatment centers and land-based healing,

“And to that young guy, Wendell, that's talking about land, land base, and all that we need more people to be projecting in a land-based education aspect of it. We need treatment centers and active act to treat our people with interdictions, and I was thinking about Recluse Lake. And we need people like that to educate our people to do our flying and fly outs camps to for people to for centers to be out in the land area instead of urbanized settings.” (NB, TCN).

139. Should the development of electric production in the South associated with the natural gas turbines and wind power enable reductions in the stress regarding northern ecosystems and thus in human health indeed occur, then this would also have substantial implications for human health.

Cultural wellbeing

140. Some spoke to the deep connection between the land and human health and cultural wellbeing,

“That's a destruction. And an Elder was stuck there one time and felt like this. And I thought there was something wrong with him. Only to say, I'm lonesome, I'm lonely. I figured it was a recent passing of his partner. And it wasn't. It was about the land, the destruction of the land. And the truth and everything else. It really hurts if you know what I'm talking about. But if it's heard about, it doesn't mean nothing to you. And a lot of us were brought up that way, a lot of us.” (MG, PCN)

141. Nations have long depended on and still depend on gathering traditional medicines that they use to manage their own health in ways that are integrated with culture and ceremony. These cultural practices, the medicines and indeed human health are all tied to hydro related changes in the environment,

“Since then, we've lost people. We've lost people left and right. Diabetes have taken a toll. Never had those problems before. When I was growing up, nobody died of cancer or of diabetes or of heart conditions or liver. They never did. They died natural, the natural death. But since that's maybe more than tripled already. When you see land that is being destroyed. In that land is medicines for our people. There are medicines there. That's why people were so healthy back then. They thought they took their medicines, traditional medicines. And now it's they get this one without even knowing what they're taking, it's really, really bad: really, really bad.” (MG, PCN)

142. This of course has implications for access to traditional foods and food security, all of which is far healthier, culturally appropriate and affordable than store-bought processed foods. Levels of diabetes and heart disease continue to escalate across these communities,

“When Hydro releases power, all those things are under the water, And that is the food that we eat. You know, it's all destroyed. And when one of us tries to shoot a moose on the on a highway or someplace like that, we get charged for that. But Hydro doesn't get charged for all this destruction that they have. This is what's feeding the people, the traditional users. The trappers that are sitting at home with their legs cut off like that. They're hurting right down there inside. They know what's missing. Part of them is gone already with destruction, a lot of damage, man, a lot of damage has happened. Lots and lots. People are just mad at these people at Hydro, and there's people that depend on it over Hydro.” (MG, PCN)

143. Again, human health and wellbeing in these communities is closely linked to the environment and thus dependent upon on electricity production in the North and now in the South, to the degree that some evaluation of the IRP on human health and wellbeing should have been considered

Future Generations

144. Some were concerned about the implications of these changes and access to the environment not only to their own wellbeing but to that of future generations. Changes that made it difficult to pass on these land-based teachings, culture and language to their own children (**Plate 7**),

“I worry about the future, though, because I'm worried about my culture dying. My culture dying out. There's very few people that know the land because of the destruction of our lake. We can't go out on our lake to do anything no more. Like, how we used to. There was these.. what did you guys call them, green livers. The green livers were in a good part of the lake before our natural, not natural food source, and all that. Now I don't.. I can't... when I was a kid, I remember my dad taking me out on the lake. Remember these duck hunting spots with these green livers all around. And now I can't even show my kids that how beautiful it used to look” (WH, TCN)

145. Such land based teachings and stories are regularly recorded and made available to the young through schools and other programs, but it is no substitute for being on the land,

“If it's one thing that I would like to have, is a fish that are safe for me to eat and animals that were introduced to me when I was young, but have since been gone. I would like my grandchildren and my great grandchildren to see that live, not just in pictures.” (JS, OPCN).

146. Indeed, such land-based teachings tend not to be available through the formal school system and if families no longer have easy access, progressively fewer people access the land as the damage becomes entrenched,

“It was Justice Murray Sinclair who said that the public school system has done more damage to our people than any other, a genocidal policy that has been imposed upon us. Our kids are at school, they're not out learning how to hunt, trap, and fish, and survive on the land that we, that we did not so long ago. These three people you see here, they didn't have hydro when they were growing up. And it's their grandchildren who now live and don't see, they don't feel the effects, because they don't longer live off the land. They go to the store for food. There's so few people out on the land. Hydro is going to have the easiest time.” (LM, PCN)

147. Yet, some interviewees held out the hope that the generation after this one will have greater access to these teachings,

“I've got a grandson that's 17 months old, and I need to keep doing what I'm doing, because my grandson deserves a better life than my daughter, and that's basically what my focus has been in the last year and a half was making sure my grandson has a better path to walk than his than his mom” (CA, FLCN)

Recommendation 7: That factors important to northern First Nations become incorporated into the evaluation metrics and signposts, these including but not restricted to community infrastructure, housing, culture, traditional livelihoods, health and wellbeing, and equity

7.0 A case study: Indigenous Engagement as reflected by the BC IRP

148. As we reviewed comparable IRPs in other parts of the country, it became clear that some were of substantial relevance to our own analysis, these including the BC and Yukon IRPs. Interestingly, Manitoba Hydro came to a similar conclusion about their relevance for our 2025 IRP,

“Understanding this, Manitoba Hydro continually monitors and reviews other utilities’ IRPs and their development processes in pursuit of best practices. In addition to seeing how other IRPs are developed, the content and outcomes of other utilities’ IRPs, particularly those of Canadian utilities in similarly cold climates, can productively inform Manitoba Hydro’s planning.” (2025 IRP, p 32)

149. Indeed, during the pre-hearing meetings Brent Czarnecki, Counsel for Manitoba Hydro, explicitly identified BC UC as a relevant comparison for the 2025 IRP, although more specifically regarding regulatory efficiency and an excessive use of consultants, as

part of his rationale for excluding Wa Ni Ska Tan as an intervener because of ostensible duplication of their experts,

“And we also included in our submission for your guidance some very recent findings and rulings from the BCUC because they are also engaged in an IRP process. And we believe, as outlined in our letter, that there's some learnings there that could also be applied here in the name of regulatory efficiency and also to narrow the scope of the twenty-two (22) consultants that we have. There's some good ideas in there and we support them, and we brought them to your attention for additional consideration.”(PUB Pre-Hearing Meeting, March 26, 2026, p 25; emphasis added).

Proper analogue

150. The full BCUC review of BC Hydro's 2021 IRP is the stronger analogue for the review of Manitoba Hydro's 2025 IRP. BC Hydro filed the 2021 IRP on December 21, 2021, and the BCUC accepted the updated plan by Decision and Order G-58-24 on March 6, 2024. The ongoing 2025 BC Hydro IRP is an abbreviated update filed after that accepted plan, while Manitoba Hydro's 2025 IRP is the first IRP review under Section 38.1 of The Manitoba Hydro Act. Manitoba Hydro's reliance on BCUC Order G-299-25 should therefore be treated cautiously, because that order concerned the 2025 BC update proceeding, not the full 2021 to 2024 review (British Columbia Utilities Commission [BCUC], 2024a; BCUC, 2025b; Manitoba Public Utilities Board [PUB], 2026).

151. The two reviews also differ in timing and record depth. The BCUC tested the plan over more than two years before acceptance, while Manitoba Hydro's preferred road map had already been developed before the PUB review began (BCUC, 2024a, 2024b; Manitoba Hydro, 2026a, 2026b).

General public survey and First Nation participation

152. The stronger BC Hydro evidence for comparison with Manitoba Hydro's 2025 IRP is its separate Indigenous Nations consultation stream. In Phase 1, BC Hydro invited all Indigenous Nations and Tribal Councils in British Columbia, received participation from 64 Indigenous Nations, Tribal Councils, and Indigenous organizations, held regional workshops attended by 84 participants representing 50 Indigenous Nations, received 59 Indigenous survey submissions, and held supplemental meetings with 10 Indigenous Nations (BC Hydro, 2021a, 2021c).

153. In Phase 2, 53 Indigenous Nations, Tribal Councils, and Indigenous organizations participated. This included 58 workshop participants representing 41 Indigenous Nations, 19 Indigenous survey respondents, and supplemental meetings with 11 Indigenous Nations (BC Hydro, 2021a, 2021c).

154. Unlike the MH 2025 IRP, First Nations participation in BC Hydro's 2021 IRP was not mainly documented through general public surveys. It came through a dedicated Indigenous consultation process with identifiable Nation-level participation.

Dedicated First Nations engagement in BC 2021 IRP process

155. For the 2021 proceeding, BCUC Order G-15-22 required notice to all 2021 IRP Technical Advisory Committee members, all Indigenous Nations and Tribal Councils in BC, the BC First Nations Energy and Mining Council (FNEMC), public and customer participants, and interveners in prior BC Hydro proceedings. For the 2025 update, BCUC Order G-268-25 again required notice to all Indigenous Nations and Tribal Councils in BC and FNEMC (BCUC, 2022, 2025a).

156. Manitoba Hydro faced no equivalent PUB direction requiring it to confirm Nation-by-Nation notice to all First Nations and Tribal Councils (PUB, 2026).

157. The Participant Assistance/Cost Award (PACA) mechanism applied in the BC Hydro 2021 IRP proceeding and included Indigenous participants: FNEMC, Kwadacha Nation and Tsay Keh Dene Nation, Nuuchahnulth Tribal Council, Kanaka Bar Indian Band, and Gitanyow Hereditary Chiefs. As with the IRP PUB, PACA did not guarantee full recovery, and some non-Indigenous participants received no award.

158. Yet, in comparison to the 2025 IRP, BC Hydro's 2021 Indigenous engagement was both more extensive and sustained and reached out to land users and grassroots members as well as elected leadership,

"Indigenous Nations were one stream of consultation identified by BC Hydro to satisfy their duty to consult and to support their efforts on working toward implementation of aspects of the United Nations Declaration on the Rights of Indigenous Peoples," and "BC Hydro engaged Indigenous Nations through regional sessions (virtual engagements), surveys and follow-up smaller group meetings." [MB, FNEMC].

159. The scale of engagement and how it contributed the plan was much better supported,

"During the development of the 2021 IRP, the First Nations Energy and Mining Council supported BC Hydro's engagement with over 80 First Nations, Tribal Councils and Indigenous-led organizations through virtual webinars. BC Hydro prepared summaries of the sessions and circulated to regions for review and comment. Input from those sessions were then used to inform development of the draft plan." [MB, FNEMC].

160. Evidence that BC Hydro released a draft for comment and committed to continued engagement,

“BC Hydro released an initial draft IRP for comment by Indigenous Nations and Tribal Councils and has stated that it will continue to engage with Nations in implementing the 2021 IRP and on future projects in response to the plan, which will be subject to separate consultation and approval processes.” [MB, FNEMC].

161. As part of evidence gathering for this report, BC Hydro’s contribution-agreement funding for FNEMC was a significant positive step,

“Providing funding through contribution agreements for FNEMC to participate in the Technical Advisory Committee process during the development of BC Hydro’s IRP prior to the IRP being filed with the regulator was an important and positive step that permitted FNEMC the time and budget to understand and respond to issues raised during the development of the IRP and before the plan was submitted to the regulator.” [MB, FNEMC].

162. Asked to identify three main barriers they focused on delays in progress and lack of support, although they noted these were not solely BC Hydro’s responsibility,

“Lack of progress on development of First Nations utilities”; “Adequacy of funding for First Nations participation in regulatory proceedings (BCUC cost award processes are onerous and a barrier to meaningful participation by First Nations)”; and “Engagement timelines are often compressed and First Nations are experiencing engagement fatigue” [MB, FNEMC]

The cost award point confirms the PACA record above, where awards did not guarantee full recovery.

163. First Nations feedback in the BC process was direct and often critical, as the quotes above show. Participants said reconciliation should not be treated as an optional planning value. They also raised revenue sharing, Indigenous utilities, local ownership, Independent Power Producers (IPP) participation, Free, Prior and Informed Consent for upgrades, land and water stewardship, climate risk, wildfire risk, and affordability concerns linked to time-varying rates and conservation programs (BC Hydro, 2021a, 2021b, 2021c; BC FNEMC, 2021).

How BC Hydro reflected earlier First Nations feedback into later planning

164. First Nations and FNEMC participation influenced BC Hydro’s later planning and procurement design, though no single outcome was caused solely by FNEMC. BC Hydro’s 2025 First Nations engagement material reports support for continued collaboration,

Indigenous ownership, stewardship, economic participation, and frequent IRP updates (BC Hydro, 2025a).

165. The clearest traceable example is procurement. BC Hydro engaged with FNEMC to help design the First Nations economic participation model for its 2024 Call for Power. The model required at least 25 percent First Nations equity to qualify and gave evaluation credit up to 51 percent First Nations equity (BC Hydro, 2025b, 2025e).

166. The minimum First Nations equity requirement was identified as among the most significant components of the BC process for Indigenous Peoples,

“Meaningful changes, such as BC Hydro including a minimum First Nation equity participation requirement in its calls for power, arose because of engagement with First Nations organizations before an application was filed with the regulator” [MB, FNEMC].

167. BC Hydro reflected other significantly positive aspects in its IRP including a willingness to adapt and accommodate feedback that was absent in the 2025 IRP,

“Willingness of BC Hydro to change course on some issues – specifically reversing decision not to renew certain power purchase agreements” [MB, FNEMC].

168. The 2025 Call for Power resulted in four wind projects, all with 51 percent First Nations equity ownership (BC Hydro, 2025d; Government of British Columbia, 2026). This framed Indigenous economic participation as an obligation rather than a discretionary planning value. During the 2021 IRP,

“Reconciliation with Indigenous Nations is a requirement under the Declaration on the Rights of Indigenous Peoples Act, it is not something BC Hydro and the Province of BC can trade-off against keeping costs down for customers” [MB, FNEMC].

169. It was also identified that the limit of what the regulator would order. FNEMC argued for a mandatory minimum First Nations equity level in the acquisition process, but BC Hydro maintained that creating economic opportunities through procurement or employment is a management decision, and the BCUC agreed that this falls outside its jurisdiction under Section 44.1 of the Utilities Commission Act (BCUC, 2024a; [MB, FNEMC]). That boundary matters for Manitoba, where Manitoba Hydro presents Economic Reconciliation as an evaluation metric rather than a binding procurement requirement.

170. Whether, comparing the 2021 and 2025 IRPs, BC Hydro has actually moved from consultation toward genuine recognition of Indigenous rights and free, prior and informed consent, or whether the change is mostly symbolic. BCFNEMC was direct about the limits of progress,

“At this point in time, the standard consultation framework remains the operational approach for engagement. BC Hydro has developed a UN Declaration Implementation Plan which includes the aim of working towards co-developing processes for implementing the standard of: Free, Prior and Informed Consent, on projects and initiatives. Although BC Hydro maintains a goal or aim to arrive at a consent process for its operations, they have not yet done the work to arrive at such an approach.” [MB, FNEMC]

171. This assessment matters for the Manitoba comparison. It shows that even the stronger BC process has not yet put a consent standard into operation. That tempers any reading of the 2021 to 2025 shift as a move to consent-based decision making, and it places BC Hydro’s minimum First Nations equity requirement in context as economic participation secured through early engagement rather than a completed consent process. That said, that Indigenous rights play a key role in the way that the BC IRP was drafted along with explicit reference to UNDRIP and BC DRIP, processes shaped by the FNEMC.

Relevance to Manitoba Hydro’s 2025 IRP

172. Manitoba Hydro’s IRP provides little if any evidence that First Nations-specific engagement meaningfully shaped its plan. Manitoba Hydro distributed its Round 1 First Nations Leadership Survey to the leadership of all 63 First Nations in Manitoba by piggybacking an AMC meeting, but only 11 First Nations leaders and staff responded (Manitoba Hydro, 2026a).

173. The same engagement report identifies 13 interview participants and/or Round 1 survey respondents for Indigenous Nations Leadership (Manitoba Hydro, 2026a).

174. Where Manitoba Hydro does credit Indigenous feedback with shaping the plan, it attributes the Economic Reconciliation evaluation metric to interviews with three Manitoba Métis Federation staff, conducted under its TAC member interview stream, not to any of the First Nations Leadership Surveys (Manitoba Hydro, 2026a).

175. Manitoba Hydro distributed its Round 2 First Nations Leadership Survey to the leadership of all 63 First Nations in Manitoba on December 9, 2025. Only 14 participants completed it. Manitoba Hydro cautioned that the results were a small sample representing only those who chose to participate (Manitoba Hydro, 2026d). This in turn demonstrated why protocols other than surveys should have been used to achieve this feedback.

176. The timing problem is also substantial. Manitoba Hydro developed its inputs, scenarios, modelling, evaluation, and a preliminary recommendation before distributing a recommended road map for feedback. Its Round 2 engagement through Interested Parties

and TAC came after Manitoba Hydro had already assembled the recommended development plan (Manitoba Hydro, 2025, 2026a, 2026b).

177. The TAC Meeting #8 summary note states that the recommended development plan was shared for awareness and understanding, and that feedback from TAC would not change it,

“Feedback from TAC will not result in changes to the recommended development plan.” (Manitoba Hydro, 2026d, p 149)

178. Asked for the most important insight for First Nations and Indigenous organizations in Manitoba,

“One key recommendation is that First Nations should be involved in planning before applications are filed with the regulator. The ability to influence planning processes once an application is filed are limited.” [MB, FNEMC]

179. The interviewee explicitly and directly connected that timing to outcomes,

“Meaningful changes, such as BC Hydro including a minimum First Nation equity participation requirement in its calls for power, arose because of engagement with First Nations organizations before an application was filed with the regulator” [MB, FNEMC]

180. Manitoba Hydro’s sequence actually runs the other way. Its own TAC Meeting #8 summary note states that feedback would not change the recommended development plan, which places most Indigenous and TAC input after the plan was set rather than before.

181. The PUB approved WNST’s intervention on subjects related to Manitoba Hydro’s public engagement in developing the 2025 IRP, the implications of any engagement shortcomings for IRP risks and resource options, and opportunities for Indigenous-led energy resource options, including economic reconciliation (PUB, 2026).

182. The PUB also clarified that Section 35 consultation is outside the IRP review scope as required by the OIC (12/2026), because it is to proceed through a separate Crown-Indigenous consultation process. Historic environmental costs from past Manitoba Hydro developments, project-level environmental reviews, and issues unrelated to the 2025 IRP are also outside scope (PUB, 2026).

183. That scope makes the BC comparison useful, but only as an analogue for resource-planning practice rather than as a direct Section 35 consultation benchmark.

184. The BC Hydro and BCUC process supports the argument that stronger IRP practice includes a separate First Nations consultation and engagement stream early in plan development, clear reporting on how Indigenous feedback was considered or incorporated, capacity or cost support for Indigenous participation where needed, and engagement on procurement design before procurement documents and implementation decisions are finalized (BC Hydro, 2021a, 2021c, 2025d; BCUC, 2024b).

185. The FNEMC interviewee was also asked how UNDRIP and Indigenous rights came to figure in BC's IRP, and whether the BCUC was a suitable venue for advancing those rights. On the substance raised, FNEMC explained that the concerns focused on implementation impacts, rights, and title,

“First Nations communities and First Nations-led organizations identified various concerns focused on potential impacts arising from implementation of an IRP, not necessarily directly commenting on IRP elements,” “concerns were raised about impacts on rights and title matters and the need to respect First Nations governing structures and operations,” and “many communities and organizations offering comment on rights and title took care to ensure direct linkages to articles in the UN Declaration.” [MB, FNEMC].

186. Such examples tied to specific UN Declaration articles included historic redress, revenue sharing, and equity and ownership in clean energy. FNEMC noted that much of BC Hydro's activities, facilities, and infrastructure sit on or around First Nations territories,

“Historic redress, concerns regarding revenue sharing, including possible solutions, enhanced equity and ownership opportunities in clean energy,” and “the IRP process must do better to include opportunities for First Nations participation from the outset.” [MB, FNEMC].

187. BC Hydro, however, treated those issues as outside the scope of the 2021 IRP,

“Incorporating the principles of the United Nations Declaration on the Rights of Indigenous People, and other key recommendations such as the Truth and Reconciliation Calls to Action into BC Hydro's business is much broader than the 2021 IRP.” [MB, FNEMC].

188. On the venue question, BCFNEMC was clear that *“the BCUC process has limited avenues for genuine advancement”* of Aboriginal rights and rights arising from the UN Declaration, because *“the Commission does not possess the appropriate jurisdiction to advance such rights or make any declarations regarding Aboriginal rights”* [MB, FNEMC].

189. FNEMC qualified this. The Commission still requires a base understanding of Aboriginal rights, since it is at times required to ensure that the Crown's duty to consult is fulfilled and to consider how those rights intersect with regulatory decisions,

“Within the confines of its mandate, the Commission has a Reconciliation Policy which sets out five points regarding the BCUC’s commitment to ongoing reconciliation and work towards advancing the UN Declaration” [MB, FNEMC].

190. This supports the point above. The BC comparison is valuable for resource-planning practice, but the regulator itself has limited capacity to advance rights recognition. That is consistent with the PUB routing formal Section 35 consultation through a separate Crown-Indigenous process, although it does and should not exclude meaningful Indigenous engagement.

191. Two further points carry over to Manitoba. First, on conservation and off-grid communities,

“BC Hydro’s IRP process explicitly excludes non-integrated communities. BC Hydro has created a separate process for planning for non-integrated communities. FNEMC has advocated that energy efficiency planning for Indigenous Nations should be community led and noted this requires BC Hydro and the province to make investments in training and recruiting community energy specialists who understand the needs and priorities of each community. Specific energy conservation plans should be developed at the community level. Progress is being made in this regard but the work continues” [MB, FNEMC].

192. That distinction bears on Manitoba Hydro’s remote and diesel-dependent First Nations, whose conservation and reliability needs are unlikely to be captured by a province-wide survey or a single road map as well as other opportunities for community support and capacity building in this province.

193. Second, on collaboration across jurisdictions,

“FNEMC sees value in First Nations collaboration across jurisdictions. On its own initiative FNEMC met with Ministers from the Manitoba government in the summer of 2025 to begin a dialogue and to share experiences. FNEMC has also met with representatives from Nukik Corporation with respect to the proposed transmission link between Manitoba and Nunavut to share experiences” [MB, FNEMC].

194. FNEMC argues that governments and utilities should support and encourage these relationships, which strengthens the case for treating the parallel BC, Manitoba, and Yukon IRP processes as connected rather than separate [MB, FNEMC].

The application of IAP2 in the IRP processes

195. The IAP2 comparison is useful, but not as proof that either regulator formally adopted much more inclusive IAP2 categories. Yet, BC Hydro’s public and customer stream fits

consult or involve since feedback was sought before filing. Its formal regulatory proceeding fits evidence testing rather than pure public engagement. The BC First Nations stream reached at least consult in parts, but FNEMC's own reports show First Nations still challenged whether reconciliation, revenue sharing, and FPIC were actually embedded in plan design (IAP2 International Federation, 2024; FNEMC, 2021).

196. The key comparison is not that the BCUC process was perfect. The argument is that BC Hydro and the BCUC created more visible First Nations-specific channels than Manitoba Hydro has shown in this record. Separate First Nations consultation reports, direct Commission notice to all Indigenous Nations and Tribal Councils, a multi-year evidentiary review, and a procurement design process where First Nations and IPPs gave input before final RFP and EPA documents were all important elements in the BC IRP. Manitoba Hydro added Economic Reconciliation, drawn in part from MMF interviews, as a metric and proposed Indigenous majority-owned wind power, but the filed materials do not show an equivalent early, community-level process for any First Nations to shape the full range of resource alternatives before the road map was recommended (BC Hydro, 2025a, 2025b; BCUC, 2022, 2024a; Manitoba Hydro, 2026a; PUB, 2026).

Recommendation 8: that Manitoba Hydro adopt some of the key elements regarding Indigenous engagement reflected in the BC IRP. These include the creation of a separate stream of Indigenous engagement, as well as opportunities and support for meetings, workshops and training that are aimed at the leadership and grassroots of individual First Nations as well as Tribal Councils in Manitoba.

8.0 Community experiences with Manitoba Hydro and the IRP

Institutional change

197. In some ways Manitoba Hydro has made meaningful progress when it comes to engaging with northern First Nations. This seems to be largely restricted to leadership and is likely restricted to First Nations that are Limited Partners in the Wuskwatim and Keeyask dams and is relatively less effective when it engaged with communities outside of those Partnerships (McLachlan 2018). If nothing else it shows that meaningful collaboration and Partnerships are achievable when Manitoba Hydro decides to allocate its substantial resources to such activities. The question remains, why restrict this to formal (albeit deliberately limited) Partnerships?

198. As a leader from Fox Lake Cree Nation as a limited Partner in Keeyask, indicates, these relationships were certainly worse 20-30 years ago,

When I first started with the band in 1997 being a bright-eyed and bushy-tailed young man, wanted them to change the world. I used to go to the Gen North, which is the

headquarters in Gillam for Hydro. They said, knock on the door but they wouldn't answer. And I'd wait out there, and I'd wait out there, and I'd look through the window, and I'd make sure somebody saw me. Then they had to come to the door, and then most of the time the person I wanted to meet was unavailable. It wasn't until, like I said, we started diving into our negotiations that they understood that, you know, we had something to offer to them, and part of that was again cultural awareness way back in 1998. And you know, we didn't have an agreement then” (CA, FLCN)

199. Once that formal partnership was identified as a priority and ultimately signed, this engagement,

“So, with all that being said, you know, I think we gained a lot of knowledge and experience, you know, dealing with Manitoba Hydro. We've actually got them to, you know, be more hands on in terms of the consultation, you know, like because we're not going anywhere. Manitoba is not going anywhere out of all this consultation stuff. We struck another table called Harmonized Gillam Development, and only Fox Lake has a table like that where we talk to Manitoba Hydro senior officials and we talk about harmonizing Gillam development. We have a land use planning subcommittee, we have a joint employment business opportunity committee, we also have a social and interaction committee, and we meet with those on a quarterly basis.” (CA, FLCN).

200. As further elaborated upon, this kind of access to senior staff in Manitoba Hydro is something unique to this Nation, in part likely a function of the limited Partnership regarding Keeyask,

“ And we made sure that you know our rights and interests are protected in those. And those are going pretty good and that's something else too that no other community has we have we also have biweekly meetings with the senior managers in Winnipeg where we talk about local issues.” (CA, FLCN).

201. Others felt that Manitoba Hydro was still not adequately engaging with northern Indigenous communities, and that this was the norm. If anything, this engagement had declined in effectiveness.

Limited Reach

202. Manitoba Hydro exhibits a dependence on distal forms of engagement, namely in the form of questionnaires that were ostensibly designed internally and then distributed according to a variety of audiences. Indeed, two rounds of surveys were distributed across the province and engendered responses which at first glance seem impressive. In total, 12,500 responses were received, 6,800 for Round1 and 5,700 for Round 2.

203. The intent of the Round 1 survey was to document feedback as related to inputs, scenarios and metrics that would be reflected in the 2025 IRP,

***“Round 1 Engagement:** This engagement was planned to seek feedback on key inputs, scenarios, and evaluation metrics that was used within the 2025 IRP. This included connecting with various engaged audiences to understand future energy plans and needs.” (2025 IRP, Engagement Report, p7)*

The intent of the Round 2 survey was to share the Road Map, an infographic that communicated the process involved in the IRP, and feedback on learnings, actions, and signposts,

***“Round 2 Engagement:** This engagement was planned to share the 2025 IRP Road Map, including the recommended development plan. Feedback was sought on the key learnings, near-term actions and signposts.” (2025 IRP, Engagement Report, p7).*

204. The intended audience of these surveys was very broad and diverse in scope and

“From those who may be affected by Manitoba Hydro’s activities, so our energy planning reflects the needs and aspirations of customers and communities, including municipalities and Indigenous Nations. Engagement efforts also focused on connecting with those who have a demonstrated interest in energy planning in Manitoba.” (2025 IRP, Engagement Report, p8)

These opportunities were promoted through active marketing including “paid media, bill inserts, direct emails to customers, blog articles, and distribution of postcards by direct mail.” (2025 IRP, Engagement Report, p8).

205. The Manitoba Hydro surveys can be criticized for sometimes presenting leading and containing multi-topic questions and missing an opportunity to generate meaningful feedback on the IRP, especially regarding the R2 survey, which had very few directed questions and mostly focused on respondent demographics.

206. This author will instead focus on how northern residents, and especially those that are Indigenous, were effectively excluded from this process. Dr Fitzpatrick will focus her analysis on these broader design shortcomings and the public engagement strategies as a whole and there will be very little redundancy between our efforts, this as directed by the Board (Order 39/26, p37).

207. One effective element of both surveys was the inclusion of a question that prompted respondents to provide their FSA (Forward Sortation Areas) codes. There are 77 of these in the province. Although FSAs are fine grained in southern portions of the province, they become increasingly coarse grained as one travels North. Indeed, the northernmost FSA in Manitoba represents 67% of the province’s land area. Although spatial information for the

northern respondents is thus inherently limited, it at least is available and allowed us to conduct a GIS analysis of any survey responses including FSA codes and to document the inclusion – or more properly the exclusion - of northern and Indigenous respondents.

208. Targeted outreach with Indigenous groups was undertaken by Manitoba Hydro, namely through a complementary survey aimed at elected leadership, which was distributed at an Assembly of Manitoba Chiefs meeting in late 2024 focused on Energy and Climate Change. Of the 63 leadership Round 1 surveys that were distributed, 11 responses were received from leadership and their staff. In these, respondents indicated their interests future engagement sessions, being involved in energy planning and learning more. In addition, interest was expressed regarding in-person meetings and workshops, three of which were delivered from Oct 2024 – May 2025, obviously very – and some would argue far too - late in the planning process,

“Respondents also indicated a desire for in-person meetings and presentations. Based on this feedback, an Energy Planning Workshop was developed and is now part of Manitoba Hydro’s ongoing engagement with Indigenous Nations.” (2025 IRP, Engagement Report, p12).

209. Again as always, the focus was on information sharing and low-level consultation,

“The workshops bring together several Manitoba Hydro teams to gather feedback, share information and answer questions as described in Appendix A. Three Workshops were held between May and Oct 2025.” (2025 IRP, Engagement Report, p12)

A liaison position funded by Manitoba Hydro was also established to facilitate engagement between the crown corporation and the AMC.

210. That engagement with leadership was so opportunistic and so late in the planning process and gave the appearance of a “check off” process, which is far more about the appearance of engaging rather than a genuine process of multi-way engagement and flow of information and ideas. As will be described below, Manitoba Hydro has a long history of “too little, too late” approaches that in the end are self-serving and strategic and that arguably contribute more harm than good.

211. The literature states clearly that best practices approaches to all engagement, but especially engagement with Indigenous organizations and Nations should be done as early as is feasible. The resulting exchange of ideas when it comes to priorities and possibilities is ideally co-designed in collaboration before these become fixed and thus inflexible. Indeed, this outreach occurs early enough in the process that engagement never ends. This continuous engagement in turn contributes to relationship building and the sharing of ideas that extend beyond the IRP that typify engagement processes with the Limited

Partnership Nations but that would ideally be extended beyond these five First Nations to include all 66 First Nations in Manitoba.

212. Indigenous planning has recently emerged as a field that challenges such practices. Indigenous planning has called for replacing consultation-as-usual with co-designed, self-determination-centered processes (Porter et al. 2017).

Recommendation 9: That the process of outreach and engagement with northern communities begin at least 2-3 years before the next iteration is submitted, which would enable the relationships that are identified as being so crucial to emerge. Indeed, before commencing on this plan, sit-down meetings should take place among communities, Indigenous organizations and senior management at Manitoba Hydro, to explore what is desired and what is feasible for all those involved.

TAC and Indigenous Engagement

213. No such survey with leadership was distributed within the MMF, which instead made use of interviews and workshops,

“Interviews with Manitoba Métis Federation leadership and Technical Advisory Committee representatives, as selected by MMF leadership, were initiated during Round 1 of Integrated Resource Plan engagement and continue to be conducted.” (2025 IRP Public Engagement Report, p13) .

214. There was also some participation on the TAC by Indigenous organizations. To that end, the MMF and MKO both sent representatives, although the MKO representative ceased attending after the third of eight meetings. Such a decline would normally be an indicator that the TAC is failing to meet member expectations and that the content being shared or the processes that are being followed are somehow deficient. None of this was reflected in the TAC meeting summaries and can thus only be inferred. It is interesting that the MKO representative dropped out immediately after the meeting that focused on economic reconciliation and some discussion as to how this term should be applied,

“I remember, I believe it was somebody from the Southern Chiefs organization, I believe was there at the first one, There were people from the Metis Federation there a number of times, and I do not recall any Inuit participation whatsoever. And obviously, even just having the Southern Chiefs there, ...was MKO there, I don't, I don't recall them ever being there.” [TAC1]

215. In some ways, the TAC represented the most sustained and interactive form of public engagement undertaken by Manitoba Hydro regarding the 2025 IRP, this in sharp contrast to the one-and-done approaches that characterized the rest of the public (Indigenous) engagement. That information provision and low-level consultation dominated most of the

interactions is problematic. Moreover, Indigenous participation was also severely limited, and by the fourth meeting there apparently was no First Nations Engagement at all.

216. It is hopeful that an Indigenous Advisory Circle (IAC) has just been set up with both First Nations and Métis representation to “provide knowledge, advice, and perspectives” which will be “considered by the Manitoba Hydro Electric Board in its “decision-making and governance processes” while also providing feedback to the IAC on how its advice was “considered and applied”. Moreover, at least some of the announced members are from hydro-impacted communities, including the Co-Chair and former Chief Robert Wavey from Fox Lake Cree Nation, Chief Clarence Easter from Chemawawin Cree Nation, Eva Wilson Fontaine from Peguis First Nation, and former Métis NDP MLA Harvey Bostrom from Manigotogan. There is also value to having greater and more meaningful Indigenous engagement on the TAC. However, this should extend beyond the main Indigenous organizations in the province and also extend to include grassroots and community representation.

Recommendation 10. That the barriers to effective Indigenous engagement in the TAC be documented and that any such barriers be addressed to facilitate a wider diversity of Indigenous voices as well as the inclusion of a braided approach that incorporated both Western and Indigenous Science on the TAC. And that both the TAC and IAC be evaluated for impact and process in a way that is inclusive so that any such barriers can be proactively addressed.

R1 and R2 Survey and Indigenous Engagement

217. As indicated above, the Round 1 survey was sent in November 2024 and the Round 2 survey in December 2025. In total, 6,800 responses and 5,700 responses were received, respectively, representing a total of 12,500 completed surveys.

218. Responses to the R1 survey were summarized according to response distribution, sentiment, open-text participation rate, and median response length and sorted according to identity. Responses were categorized into positive (pro) and negative (con) attitudes towards Manitoba Hydro (Q# 6, Round 1 survey). In general, the majority (68.3%) of all respondents had positive attitudes towards Manitoba Hydro. In the Round 1 survey, “331 respondents identified as Indigenous (5% of the total survey responses)” (2025 IRP, Engagement Report p. 20).

219. This was highest for non-Indigenous respondents (73.0%) but was also true for Indigenous respondents, although somewhat less (61.1%). Métis respondents were relatively favourable (64.5%) and only First Nations showed a negative attitude towards Manitoba Hydro (46.9%). Indeed when the very few northern Indigenous respondents were assessed separately, the proportion that had favourable attitudes dropped sharply (25%). This of course reflects a greater awareness of the hydro impacts on Indigenous communities, especially First Nations in the North,

"The company destroyed the environment around my home community. They give little background to the community. The roads to the site and their homes are a disgusting mess and not safe. For the amount of money they take out of the community you think they could pave the roads." [R_3GBk1FxRbXRdCtH, R1, Lives in FN community, Why Trust]

and

"Manitoba Hydro has devastated First Nations communities, stakeholders put profit before people." [R_67wfNtpIGw2zhX0, R1 Lives in FN, Why Trust]

220. Yet, some awareness of these impacts were also recognized by at least some non-Indigenous respondents,

"Our northern river systems need help, what is deemed green energy for folks in Winnipeg is certainly not for folks living up north and wildlife."
[R_3PozQGEbLn1RjTH, R2 Northern, White, Additional Comments]

Table 3. Round 1 public survey — Summary statistics by group identity and region

Group	N	Pro	Con	Pro %	Con %	Has Text %	Neutral	Median WC
Overall	7,942	2,801	1,300	68.3%	31.7%	58.0%	3,841	46
Non-Indigenous	3,453	1,813	669	73.0%	27.0%	78.4%	971	55
Indigenous (all)	331	154	98	61.1%	38.9%	79.5%	79	55
First Nations	62	23	26	46.9%	53.1%	79.0%	13	66
Metis	269	131	72	64.5%	35.5%	79.6%	66	52
Northern	170	86	39	68.8%	31.2%	80.0%	45	58
Winnipeg	2,377	1,225	493	71.3%	28.7%	79.5%	659	58

221. Response rates / 1,000 were highest in southern regions of the province, including urban centers like Winnipeg and Brandon and lowest so in the North (**Fig 2**).

222. The use of FSA codes by most of the respondents (69% in R1, 77% in R2, and 73% overall) enabled a spatial analysis of the survey respondents, these portrayed as more intuitive provincial maps with the various FSAs identified as well as more detailed heat tables. It was this analysis that led us to realize how under-represented Indigenous. Respondents were from northern Manitoba and gave rise to Wa Ni Ska Tan. Requesting that an additional survey be sent out through its networks, targeting Indigenous respondents especially from the North (WNST 9, May 12, 2026 motion).

223. When Indigenous representation is identified according to FSA, census data indicates that the high proportion of residents live in the northernmost FSA (90.1%: R0B) (**Fig 3**).

These are sorted from northern most to southernmost, and it is clear that many of the residents the “near-North” FSAs are also Indigenous (44.2%: R8N; 47.6%: R9A; 38.9%: R0L). The next cohort us all from the rural South (15.9%-42.8%) and finally Winnipeg (19.1%-35.0%). When R1 and R2 are combined, the percentage of respondents is lowest (11.1%) for R0B, although it should be noted that the percentage of all respondents was also low for this FSA. The Representation Index represents the percentage of respondents who are Indigenous in the survey / percentage of respondents who are Indigenous in the census. And predictably it is much lower for R0B (0.12) than for any of the other FSAs (mean: 0.35). Although the population density for R0B is substantially lower than for other FSAs especially in the South, the response rate/1,000 was still much lower (0.12) than all the other FSAs (**Fig 3**),. This pattern is true for all the FSAs for the province (n=63) (**Fig 4**).

224. These patterns were also evident when absolute numbers of respondents were examined spatially, showing that R0B was lowest. Indeed, there were only four Indigenous respondents from R0B in the R1 survey (one Métis, three First Nations) (**Figs 5, 6**).

225. The Representation Index (% survey responses Indigenous / % census data Indigenous) was compared to a Manitoba Hydro equity index (% survey responses Indigenous / % Manitoba Hydro customer base Indigenous) (**Figs 7, 8**). The patterns were very similar, although the underrepresentation was more stark using the census data (representation index) (**Fig 9**). Yet the equity index using the Manitoba Hydro customer based indicated that about a third of a value of Northern Manitoba means it contributed about a third (0.34) of the responses that its customer base would warrant (**Fig 10**).

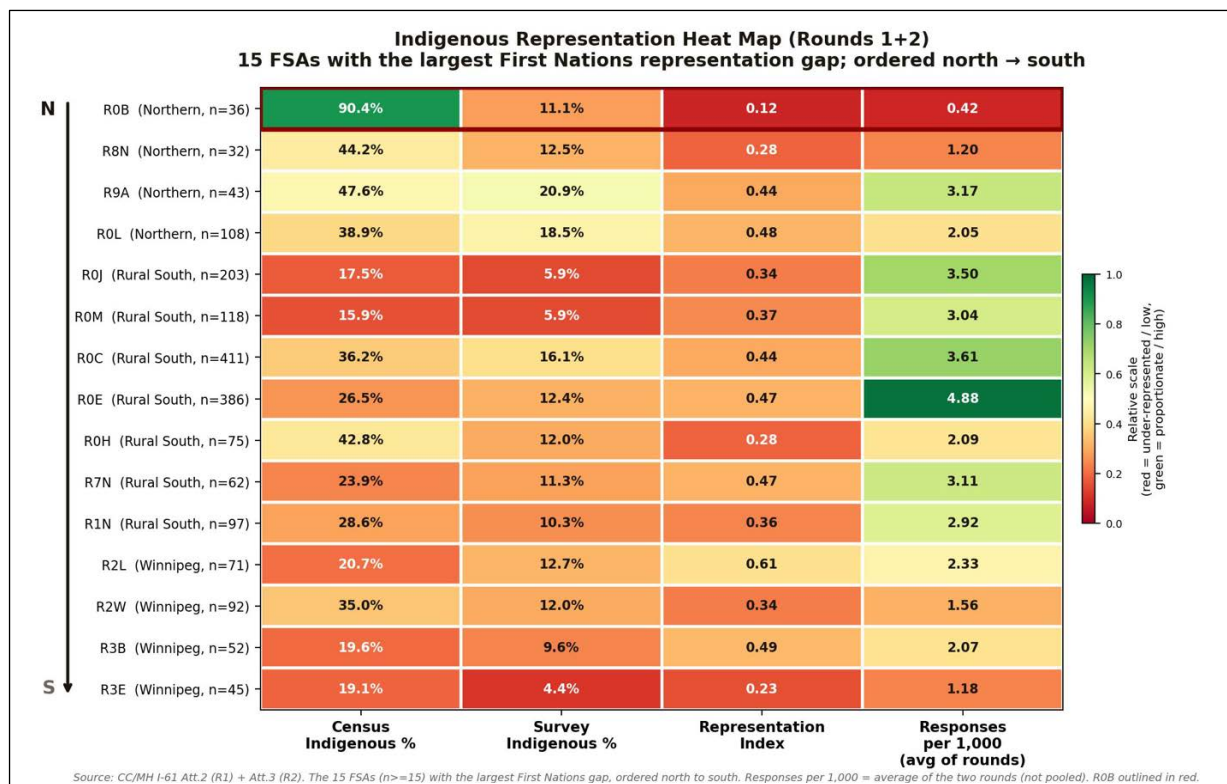


Fig 3: Heat Map of Indigenous Representation by FSA (Rounds 1+2). The 15 FSAs (n≥15) with the largest First Nations representation gap — where survey First Nations share falls furthest below the Census baseline — ordered north to south. Source: CC/MH I-61 Att.2 (R1) + Att.3 (R2); Census 2021.

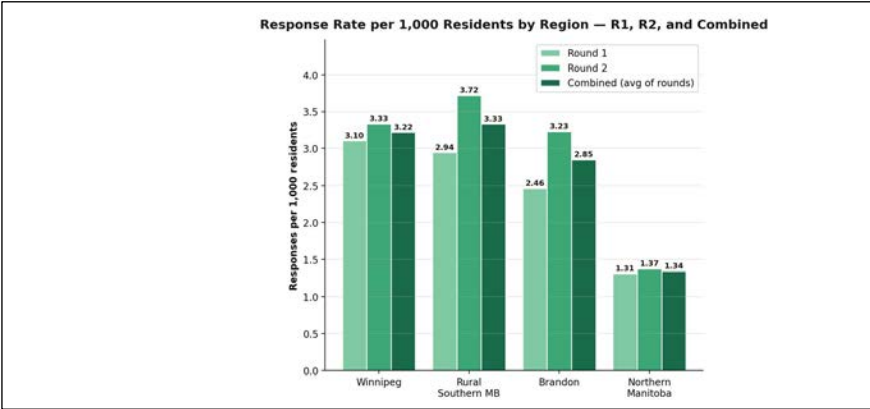


Fig 2. Responses rates / 1,000 for R 1, R1, and R1+R2 according to region



Fig 4: Heat map indicating Indigenous representation in 2024 Manitoba census data, R1+R2 IRP survey responses, representation index and responses per 1,000 for all the FSA's in Manitoba (n=63) these ordered from North-South

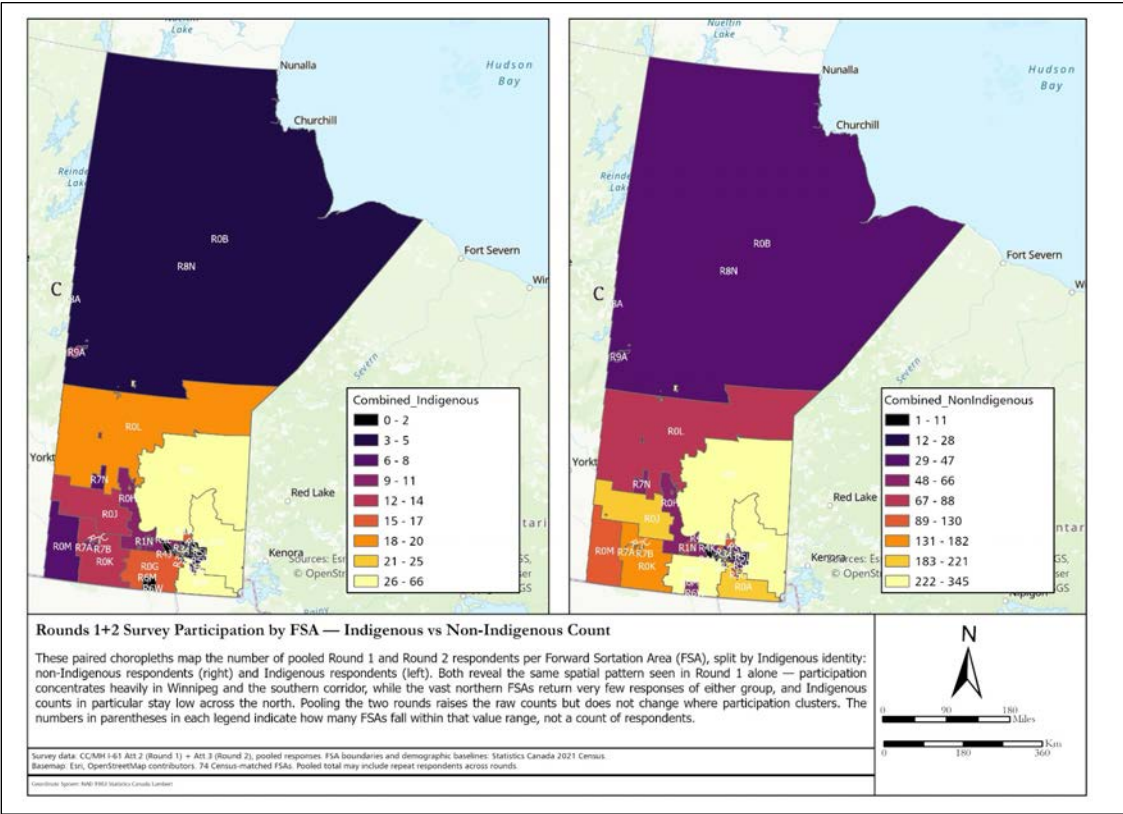


Fig 5: Indigenous vs. non-Indigenous participation in IRP surveys this combined for both (R1 +R2) according to FSA

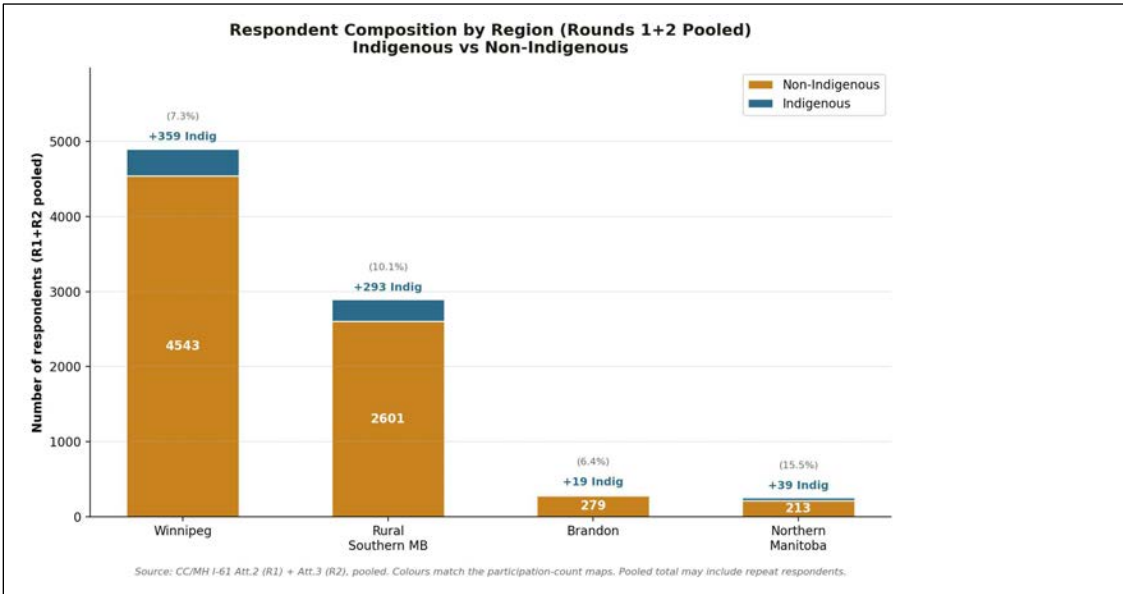


Fig 6: Indigenous vs. non-Indigenous composition of participants in combined IRP survey rounds(R1+R2) according to region, these including Winnipeg and Brandon as well as rural and northern regions of Manitoba.

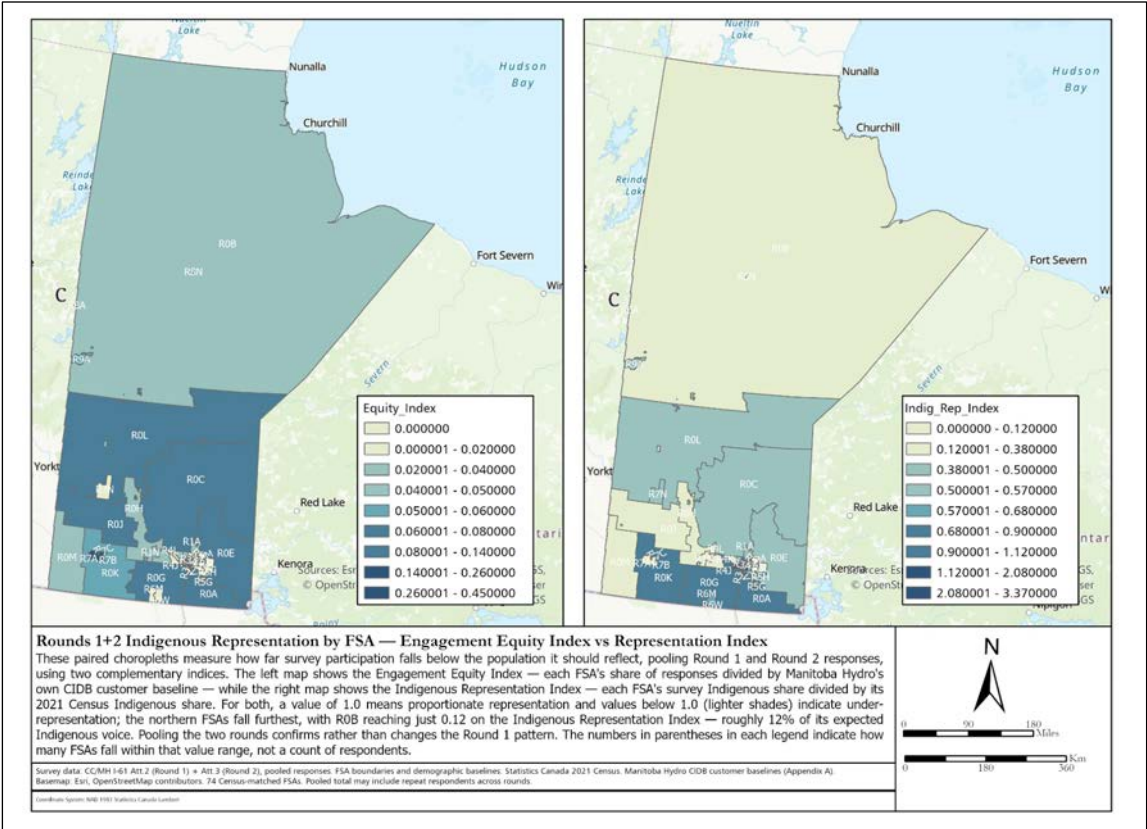


Fig 7: Spatial distribution showing Indigenous representation in combined rounds of IRP survey (R1+R2) in FSA, reflecting Representation Index (Indigenous participation/Indigenous population according to census data) and Engagement Equity Index ((Indigenous participation/Indigenous population according to Manitoba Hydro rate paper data)

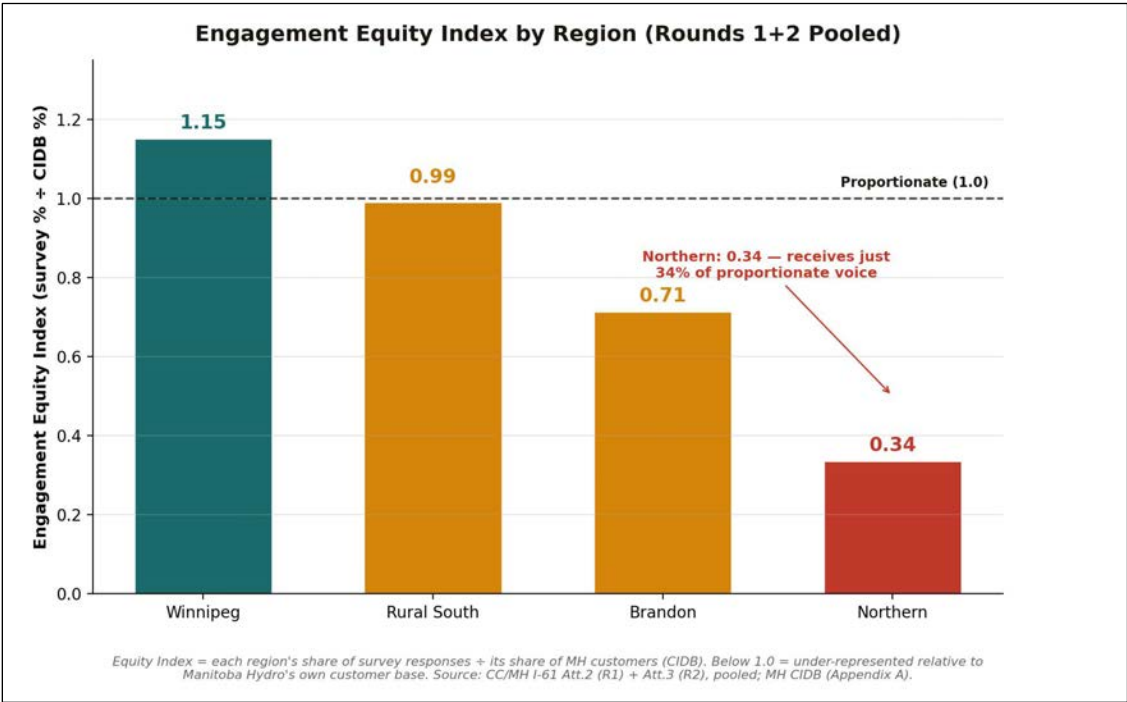
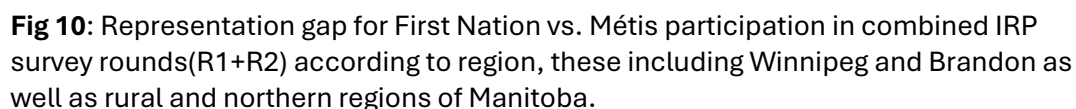
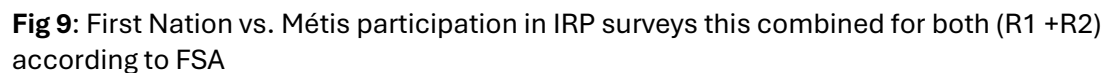


Fig 8: Engagement Equity Index as a measure of Indigenous participation for combined IRP surveys (R1+R2) for Winnipeg and Brandon as well as southern rural region as well as northern region of Manitoba



226. Thus, in response to this consistent exclusion of Indigenous respondents from northern Manitoba, the Board provided WNST the opportunity to conduct their own survey. The survey was distributed on June 8 and the sample window was closed June 15. In total, 55 completed questionnaires were returned. In total, 71.7% of those respondents who indicated their identifies self-identified as Indigenous, almost half (47.9%) as First Nations living off reserve and 17.4% First Nations living on reserve; in contrast, 6.5% self-identified as Métis (**Fig 11**). Respondents differed widely in age although the largest group (31.9% were 45-54 years of age (**Fig 12**). More than half were women (55.5%) whereas 34% were men and 8.5% were two-spirit or non-binary (**Fig 13**). Almost half (47.8%) had hunted, fished or trapped sometime over the last two years (**Fig 14**)

When the Manitoba Round 1 and Round 2 surveys were compared to our (WNST) survey, it was clear that a greater proportion of our survey responses were Indigenous (5.1% (R1) / 5,8 % (R2 VS. 23.3% (WNST) (**Fig ****). Correspondingly, MH survey responses were more likely to be completed in urban and rural areas than the WNST survey (**Fig 15**). When non-Indigenous respondents completed their surveys they displayed the opposite pattern - they were more likely to be concentrated in urban and rural regions and mostly absent from the North (**Fig 16**)

227. Concentrating on Indigenous respondents, they were proportionately more likely to be from the northernmost regions of the province. And indeed, despite the large difference in total responses (11,000 vs. 55), a greater absolute number (5 (WNST vs. 4 (3+1) MH survey responses) (**Fig 17**).

Indeed, when Indigenous responses are examined for the WNST survey, they were much more likely to come from the North. Indeed, there were no non-Indigenous responses at all from the northern region (**Fig 18**).

228. Accepting that comparisons with the MH data are made difficult by the small sample size, the WNST was ultimately highly successful in targeting northern Indigenous responses given the small time window and the inability to let people know that they would be receiving a survey. Indeed, it shows how building on existing networks and targeted outreach can be highly useful in addressing information gaps regarding the northern regions of the province.

Recommendation 11: That surveys that Manitoba Hydro used as a (the) primary tool to educate and get feedback on the 2025 IRP substantially underrepresented northern residents of the province and especially northern First Nations residents, an underrepresentation that can in part be addressed through some other platforms for outreach and survey recruitment, using social media like Facebook, Twitter/X, and Instagram and perhaps conducting a subset as in-person household surveys.

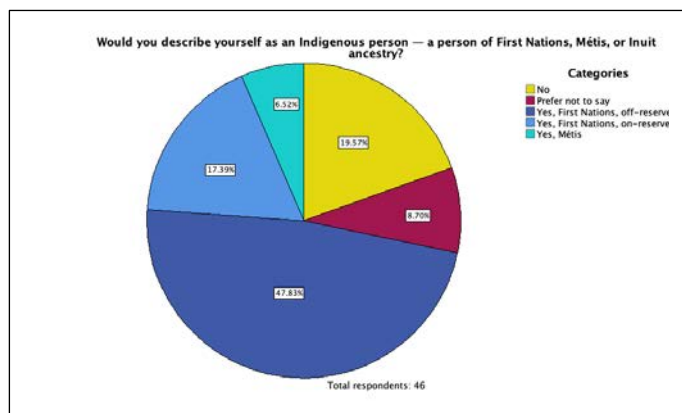


Fig 11. Indigenous identity of WNST survey respondents. 71.7% identified as Indigenous (47.8% First Nations off-reserve, 17.4% First Nations on-reserve, 6.5% Métis); N=46.

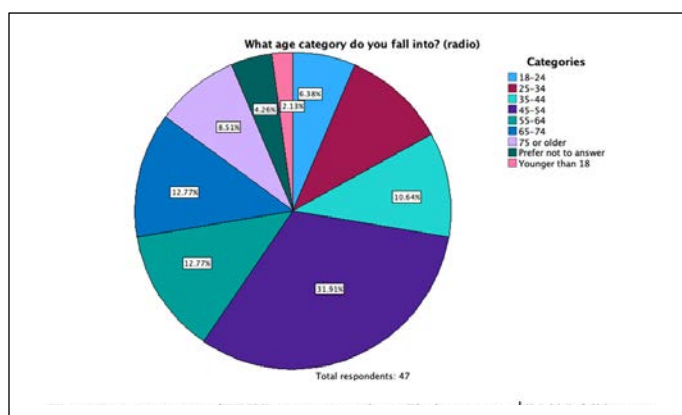


Fig 12. Age category of WNST survey respondents. The largest group (31.9%) fell between 45 and 54 years old; N=47.

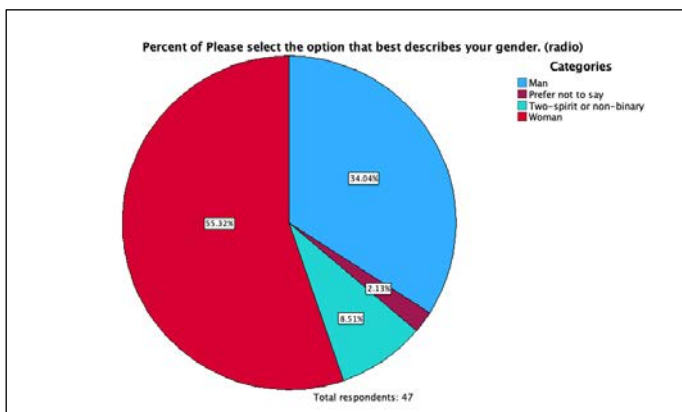


Fig 13. Gender of WNST survey respondents. 55.3% identified as women, 34.0% as men, and 8.5% as two-spirit or non-binary; N=47.

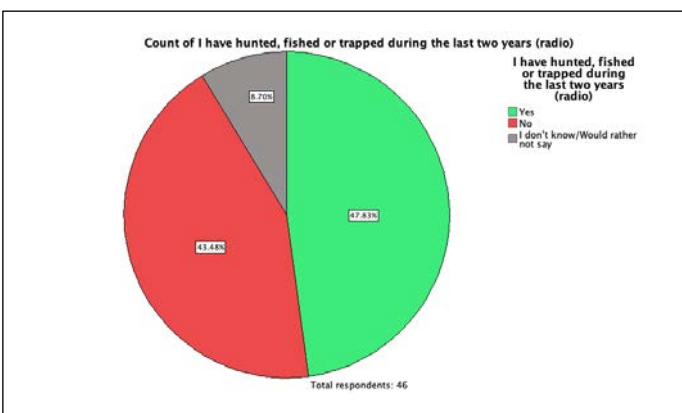


Fig 14. WNST survey respondents who hunted, fished, or trapped in the last two years. 47.8% answered yes; N=46.

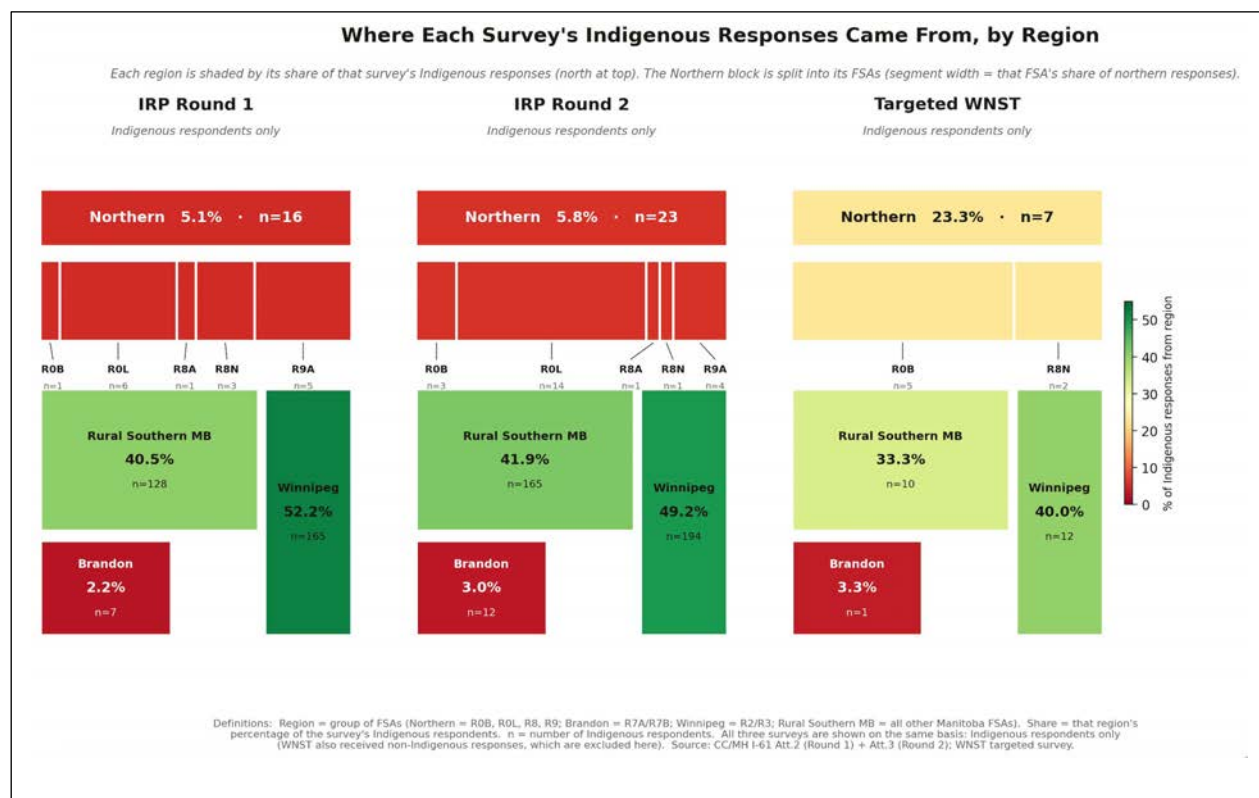


Fig 15. Spatial distribution (%) of Indigenous respondents to WNST and Manitoba Hydro IRP surveys (Rd 1 and Rd 2) according to northern, rural southern and urban categories.

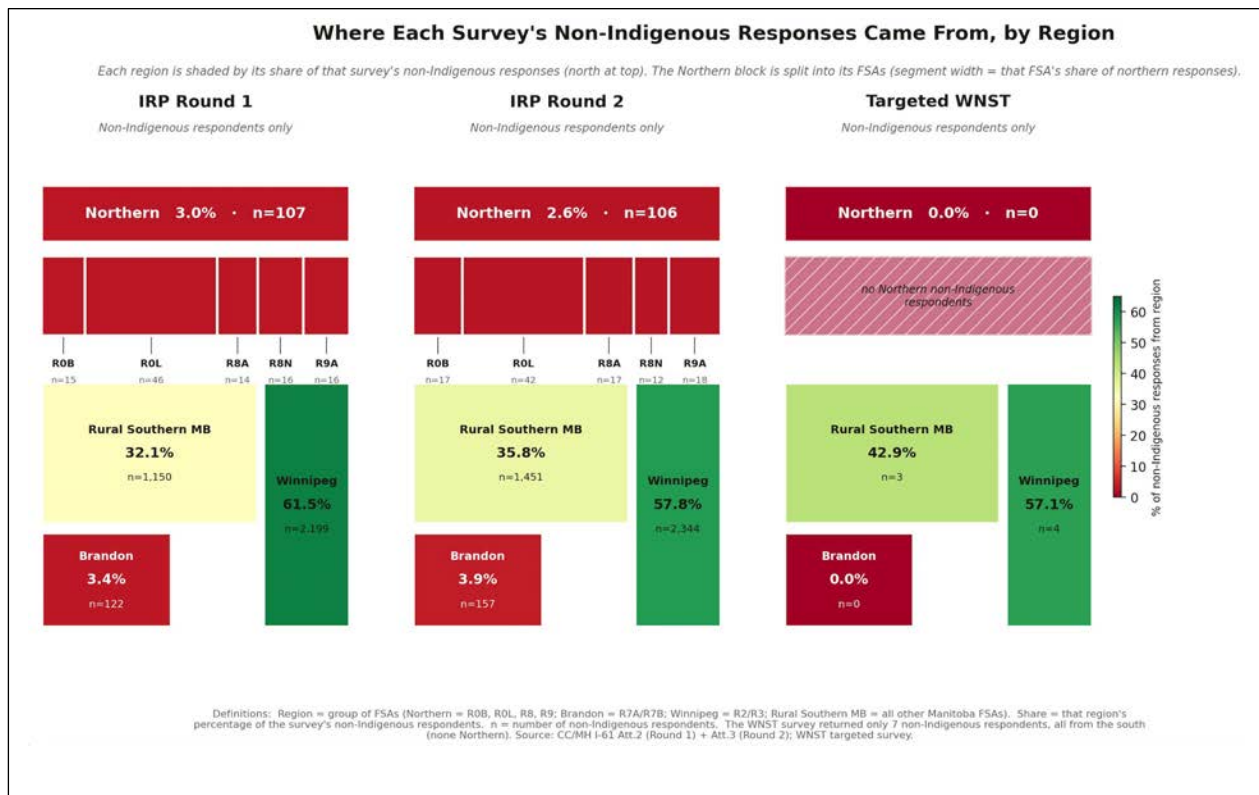


Fig 16. Spatial distribution (%) of non-Indigenous respondents to WNSK and Manitoba Hydro IRP surveys (Rd 1 and Rd 2) according to northern, rural southern and urban categories.

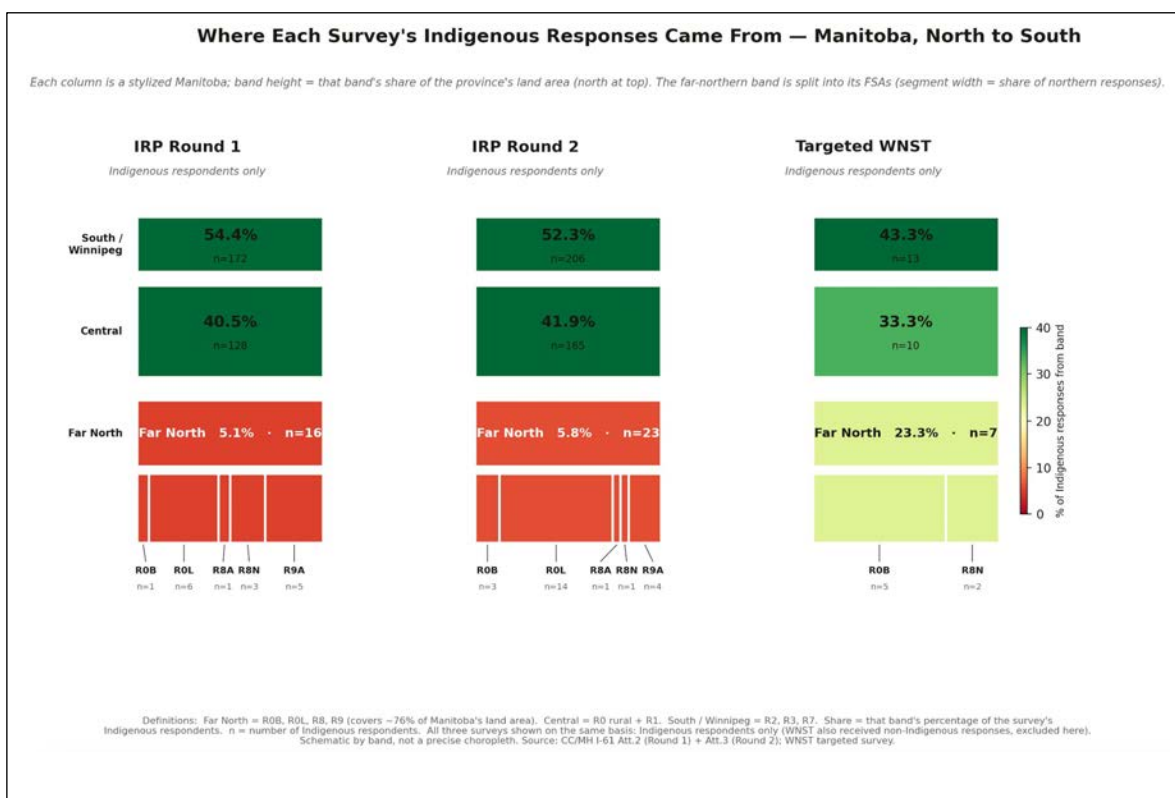


Fig 17. Spatial distribution (%) of Indigenous respondents to WNSK and Manitoba Hydro IRP surveys (Rd 1 and Rd 2) along a North-South gradient.

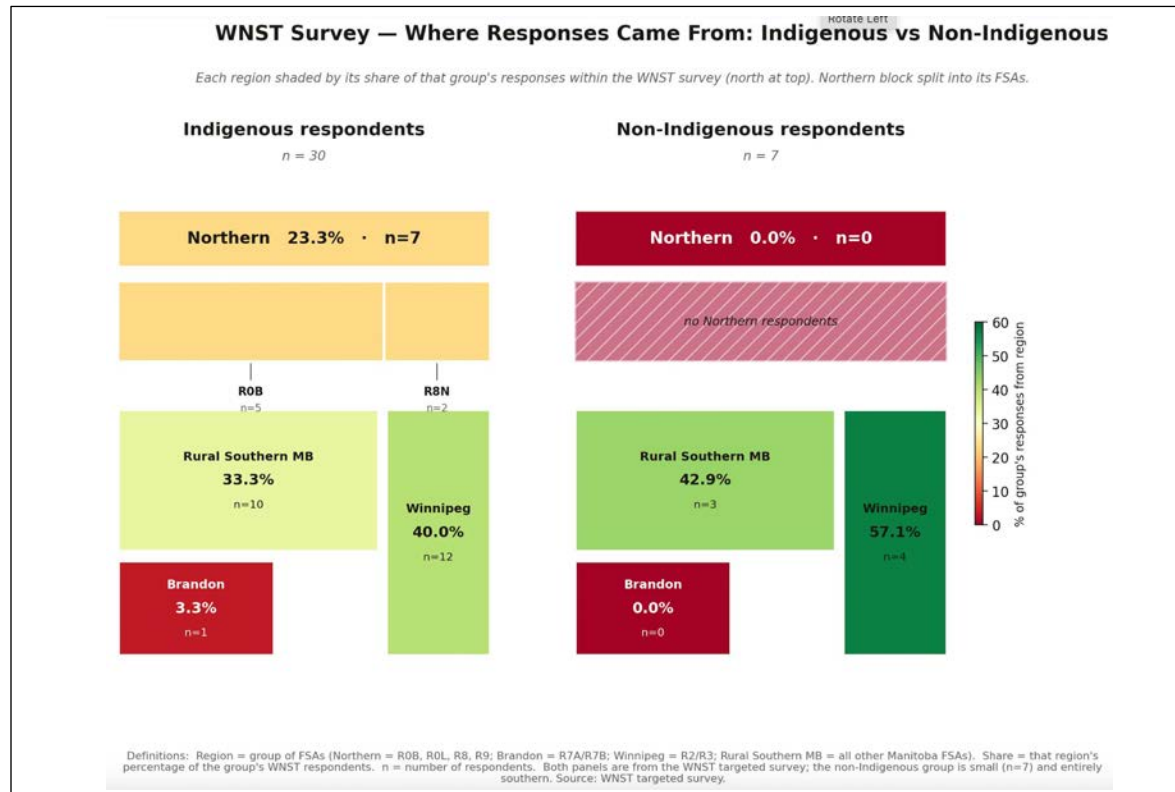


Fig 18. Spatial distribution (%) of Indigenous and non-Indigenous respondents to the WNSK survey along a North-South gradient.

9.0 Existing Indigenous engagement by Manitoba Hydro

229. As indicated above, very few Indigenous people we interviewed had heard of the 2025 IRP and thus would have been unable to provide any feedback on any engagement that was conducted around this regional energy plan. Our strategy was two-fold, we began by talking about what worked and what didn't work when it came to Indigenous engagement on the part of Manitoba Hydro, which was then complemented by what might be done to address any such shortcomings or to expand on any existing or potential successes.

230. This lack of familiarity with the IRP was borne out in the survey data. 71.4% of WNST respondents indicated they were either unaware of the IRP or had only heard about it without understanding what it was, and just 12.2% reported being fully aware and having taken part (**Fig 19**). When given details of the IRP's proposed resource additions and invited to comment, the most common response (30%) pointed to gaps in engagement with northern and Indigenous communities, followed by calls for Indigenous-led energy projects (19%) (**Fig 20**).

231. Examining only WNSK survey responses, when asked to prioritize among potential planning factors, WNST respondents rated protecting the environment and reducing greenhouse gas emissions most highly, with full agreement on importance (100%), while promoting economic development, though still seen as important by 84.6% of respondents, ranked comparatively lowest (**Fig 20; Table 4**).

Land acknowledgement

232. The 2025 IRP began with reflective land acknowledgement along with some stylized traditional beadwork,

“We acknowledge these lands and pay our respects to the ancestors of these territories. The legacy of the past remains a strong influence on Manitoba Hydro’s relationships with Indigenous communities today, and we remain committed to establishing and maintaining strong, mutually beneficial relationships with Indigenous communities.” (2025 IRP, p5).

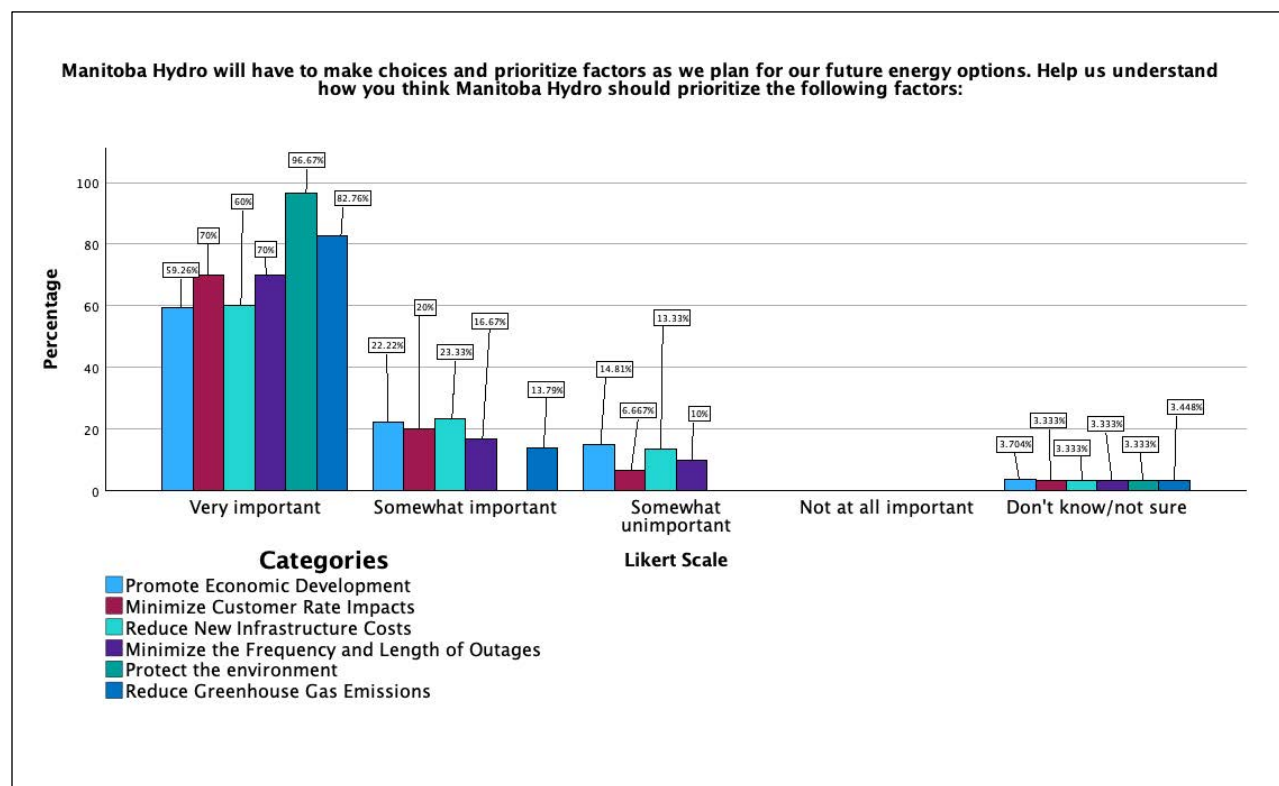


Fig 20. Manitoba Hydro planning priorities, percent rating each factor “very important.” Protecting the environment (96.7%) and reducing greenhouse gas emissions (82.8%) rated highest.

Table 4. Manitoba Hydro will have to make choices and prioritize factors as we plan for our future energy options. Help us understand how you think Manitoba Hydro should prioritize the following factors:

	Mean	N	SE	+	-
Promote economic development	3.46	26	0.15	84.6	15.4
Minimize customer rate impacts	3.66	29	0.11	93.1	6.9
Reduce new infrastructure costs	3.48	29	0.14	86.2	13.8
Minimize the frequency and length of outages	3.62	29	0.13	89.7	10.3
Protect the environment	4.00	29	0.00	100.0	0.0
Reduce greenhouse gas emissions	3.86	28	0.07	100.0	0.0

Note: 4=Very important, 1=Not at all important; Don't know excluded from N and proportion calculation; SE: standard error.

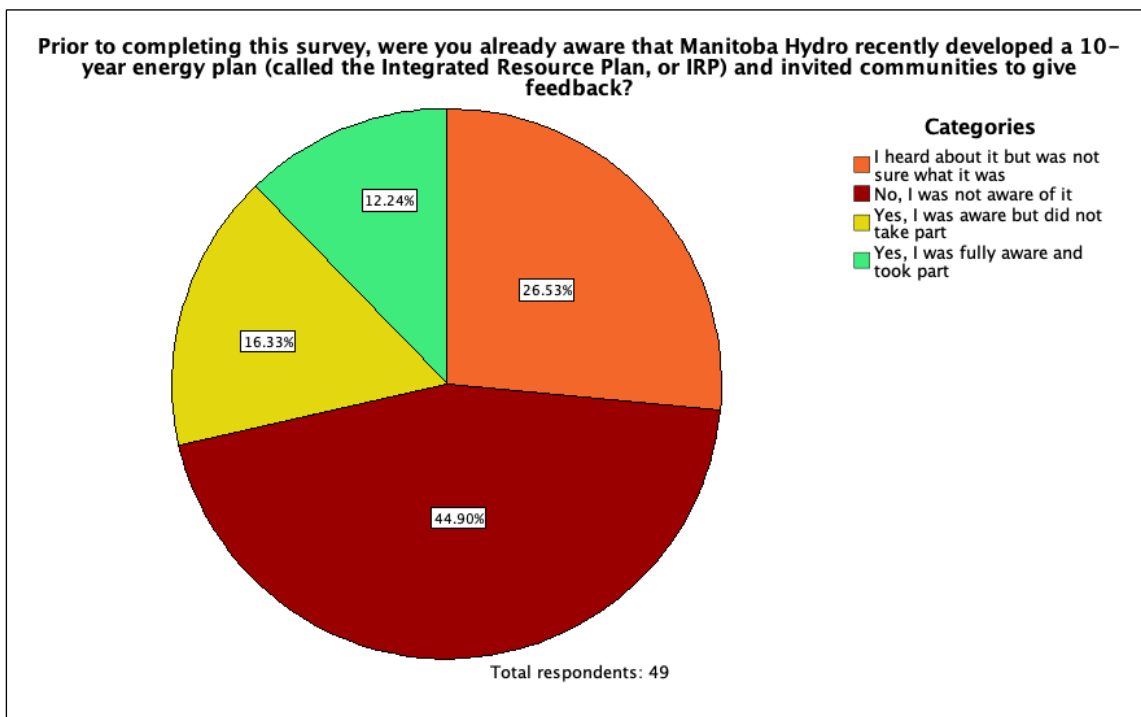


Fig 19. Awareness of the 2025 IRP prior to completing the WNST survey. 71.4% were either unaware or had only heard about it without understanding what it was (n=49).

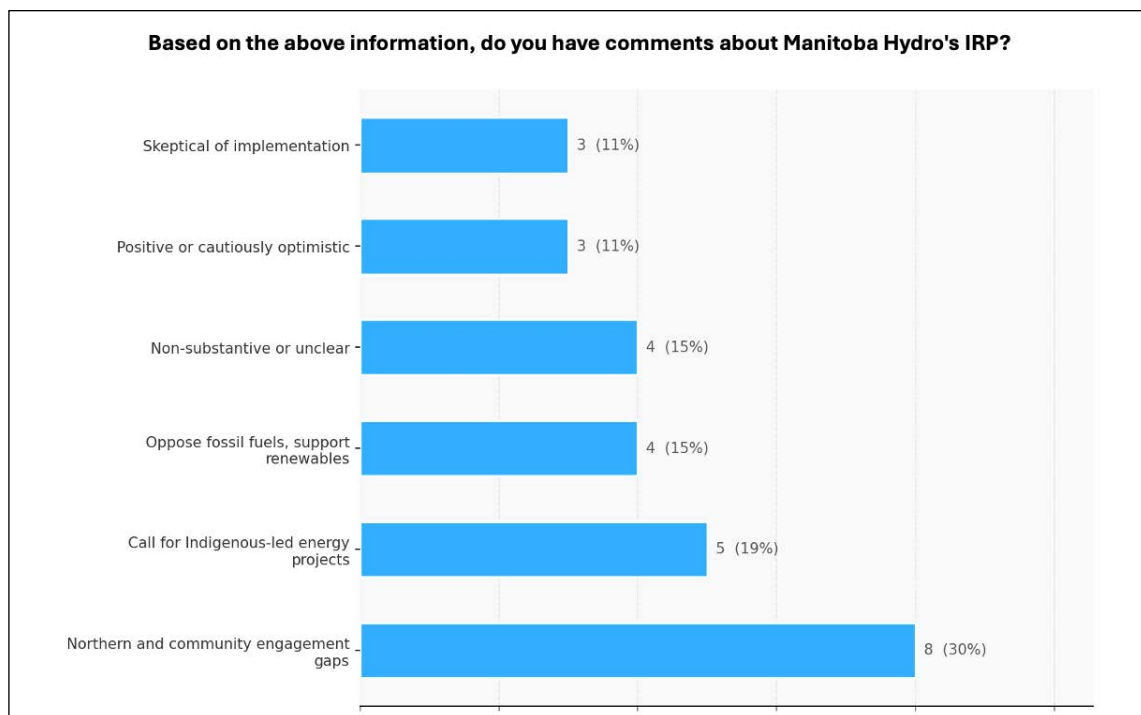


Fig 20. Coded themes from open-ended comments on the IRP after being shown its proposed resource additions. The most common response (30%) pointed to gaps in engagement with northern and Indigenous communities, followed by calls for Indigenous-led energy projects (19%); N=27.

233. This statement engendered some strong responses arguing that the reconciliation is grounded in truth and in changing attitudes and actions,

“It's just hypocritical for hydro to do a land acknowledgement without meaningful change. As far as committed to meaningful engagement or change, until you actually do it, you have a commitment to do sometime in the future, so they don't have any actions. And I think that's the main problem. That they shouldn't be doing land acknowledgements while they're destroying land and waters and wildlife and fish. But being committed and doing something are two different things...The words ring hollow. Knowing the history of hydro, knowing the devastating impacts that I'm allowed to talk about, their land, acknowledgement means nothing. Because there's no meaningful action with it. Being committed to something and following through are two different things...There has been no meaningful action or change with Manitoba Hydro, and again, things have gotten worse with their operations, but also their engagement with indigenous community.” (LD, OPCN)

234. The use of such land acknowledgements is seen by some as a signal that values are changing, but are also highly criticized as empty promises that can cause harm if not actually accompanied by meaningful change (Wark, 2021; Ryan-York, 2025).

Inaccessible and technocentric

235. Some felt the outreach surrounding the IRP was effective including this Métis respondent who found out about the proposed changes to energy production through the survey itself,

“I like this approach to informing customers. I did not know this was in the works.”
[R2, R_7fK8aUHTFxiZpm2]

236. Yet, many others indicated the exact opposite, finding the outreach too technical and thus inaccessible, and ultimately counterproductive when it came to fostering awareness and public engagement,

“I think it's very high level and not particularly easy for the general public to understand; abbreviations and terminology are not conducive to building awareness and engagement” [R2, Northern, White, Road map comments].

237. Another pointed out the importance of plain language writing and the importance of reaching out to those with hearing and other disabilities,

"Yes I have reviewed the map. I like the plans that are in place and do hope for low cost hydro bills for everyone. I recommend two things: - Always make sure the English is plain English - Recommend to have this document and future documents in American Sign Language. We do have Deaf Interpreters and I am on that team. I believe everyone has the right to be involved and its important all voice and opinions are included in this to make better plans."

[R_1mgZCaYBv2iJARX, R2, First Nations, Road Map comment]

Inadequacy of survey

238. One First Nations respondent questioned how it would benefit him and his family, especially when it came to any socioeconomic benefits for Manitobans,

"How does this benefit the environment. How does this benefit my home/family? What are the socioeconomic aspects mentioned in the road map"

[R_5odaASA3tP4CjEB, R2, First Nations, Road Map comments]

Lack of integrity

239. Some questioned the integrity of Manitoba Hydro, both regarding its commitments and ability to deliver on them.

"I remember earlier on in the negotiations when we were talking about all these committees, I noticed that they had a majority of the committee members on all these files. So, basically, what that meant to me was, we're going to be overruled all the time. Then I was assured back then, they said, "Oh no, it's going to be done on consensus". I said, "well, why don't you put that in writing? There was consensus, say it." But they said, "oh, we can't do that. I said, "well, you're lying to me then, and I'm going to make a prediction". I said, "I'm going to, to predict somewhere down the line, that you guys are going to muscle us, that you're going to use your majority ownership, and you're going to muscle us. I said, "I guarantee you that's going to happen." And I said, "when it does, I'm going to say, I told you so". You want to know when that happened? COVID!" (CA, FLCN)

240. Indeed, this skepticism is echoed in the survey data: just 7.8% of WNST respondents strongly agreed that Manitoba Hydro has their best interests at heart in future energy planning, while over half (50.98%) disagreed to some degree (**Fig 21, Table 5**).

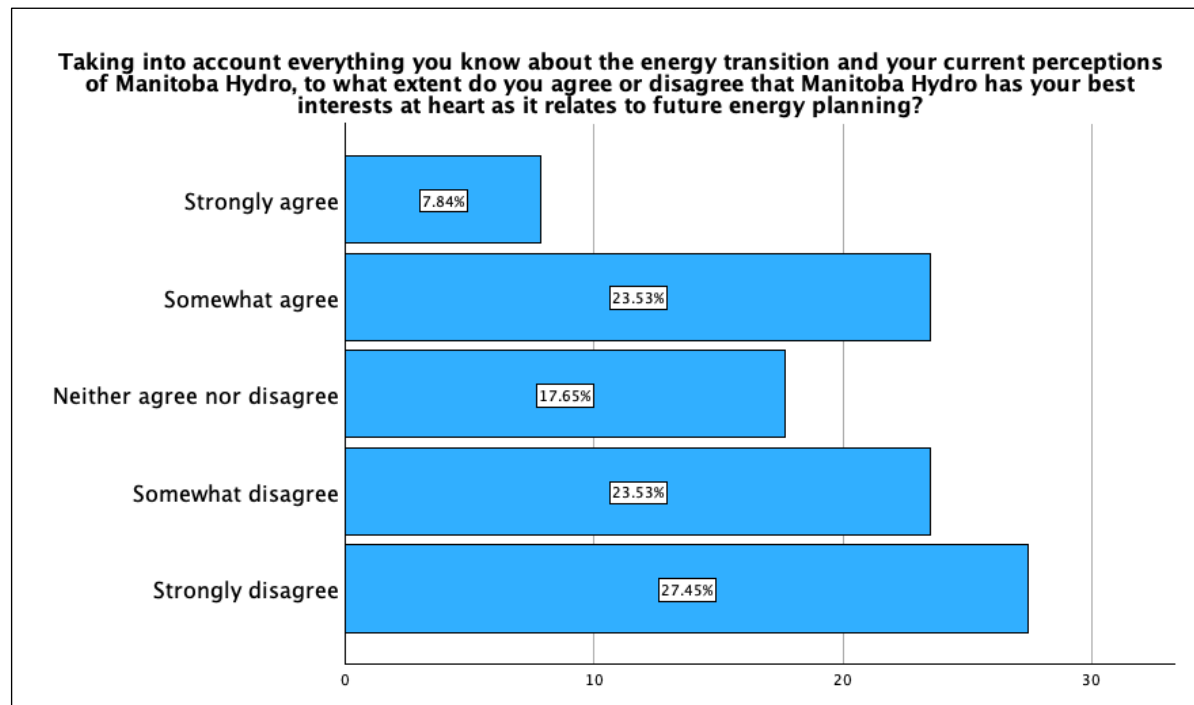


Fig 21. Agreement that Manitoba Hydro has respondents' best interests at heart in future energy planning. Just 7.8% strongly agreed; 51.0% disagreed to some degree; N=51.

Table 5. Single-item agreement ratings

	Mean	N	SE	+
Aboriginal and Treaty rights should be meaningfully integrated into Manitoba Hydro's next phase of the IRP planning process	4.96	46	0.03	100.0
My household already takes steps to conserve energy and improve efficiency	4.39	44	0.11	95.5
Manitoba Hydro has my best interests at heart as it relates to future energy planning	2.52	42	0.22	38.1

Note: 5=Strongly Agree, 1=Strongly Disagree, neutral values eliminated for proportion calculation; SE: standard error

241. This lack of sincerity was not restricted to Manitoba Hydro either,

“The provincial government, I don’t trust at all. Because I had my run-ins with them, and all that. But I know they’re just in it for their own pockets, their own well-being, and there are voters up here. But when we vote, and they come smiling in the reserve, we should just fucking throw them out.” (NB, TCN)

Asked to explain their trust rating, respondents most often pointed to environmental damage and water impacts (30%) and a lack of meaningful engagement (24%), with power outages and service failures close behind (21%) (**Fig 22**).

Deliberate and intentional

242. Some clearly felt that this lack of integrity and principle was not just a question of making mistakes or a lack of experience and maturity, but that it was intentional and even cynical. With respect to the IRP, the government had deliberately restricted the ability for Indigenous communities to share their experiences and thus to become involved,

“If that’s the path they’re going to continue on, then it’s a poor one. They can do better, and they choose not to. And it’s intentional, because they don’t want people sharing the reality.”

(LD, OPCN).

One-way and an inability to listen and learn

243. One participant indicated that by the time Manitoba Hydro engaged with community, it was usually late in the process, too late to make any meaningful change regarding the IRP or any other major initiative. The kinds of delaying tactics and skepticism that were evident in the TAC meetings was clearly evident in community as well. Moreover, in addition to exchanging ideas, whether it be with elected leaders or land users, a commitment to change and action was also key,

“My experience with hydro, from what I’m aware, is their programs are “take it or leave it”. That’s their approach. They don’t say those words, but they bring an agreement to the community, usually the First Nation, and say, “this is how this program is going to run”. And any attempts, and I do know our First Nation leadership as an example.., the answer is, well, we’ll check into it and get back to you.. You know, you should have a two-way conversation, at least that’s engaging, but also a commitment for change that will be followed by an action. And the responses don’t talk to me, so that’s my reality.” (LD, OPCN).

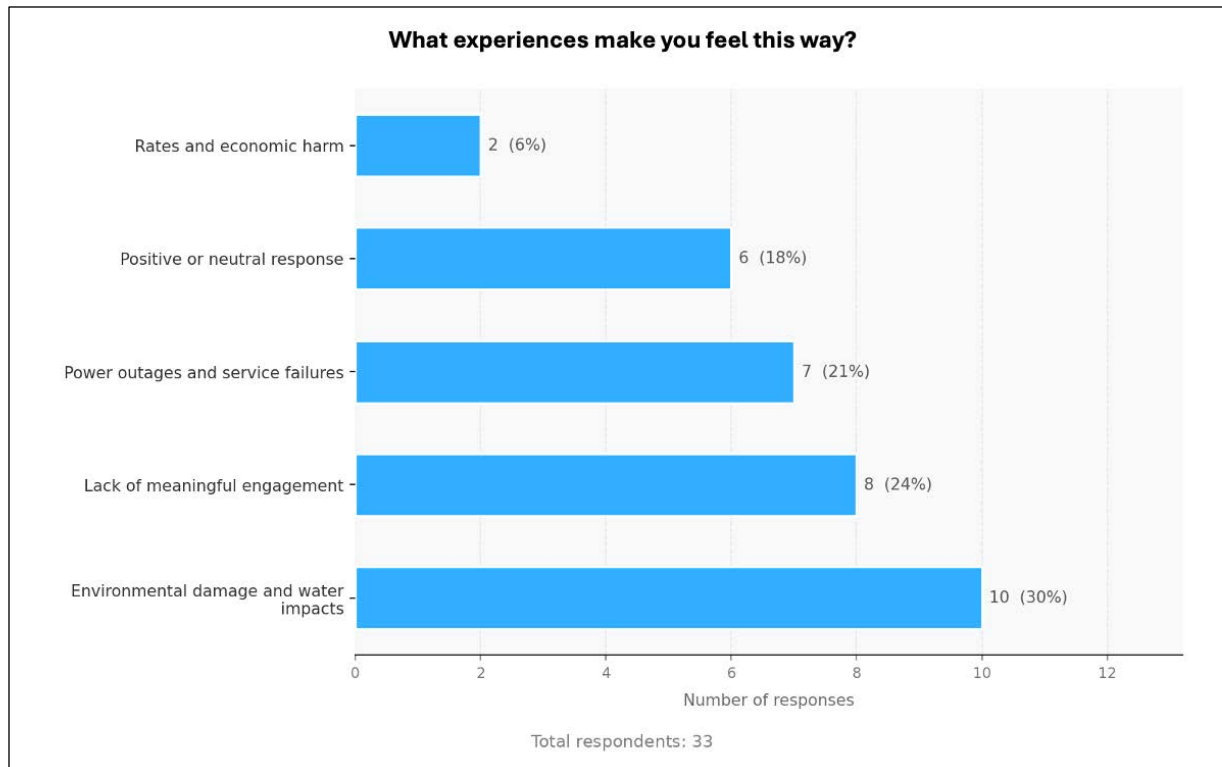


Fig 22. Coded themes from open-ended responses explaining the Q4 trust rating. Respondents most often pointed to environmental damage and water impacts (30%) and a lack of meaningful engagement (24%); N=33.

Poor follow-up

244. Some indicated that Manitoba Hydro rarely followed up to communicate any final decisions. This was not restricted to Manitoba Hydro and also included other levels of government,

“We’re usually almost exclusively told after the fact what hydro has done or decided, even though we’re experiencing the impacts immediately, and it’s a hit or miss whether they actually tell you what’s been decided. And that goes the same for the government, who is the regulatory body? So it’s just another example.” (LD, OPCN).

Not engaged

245. One participant indicated that there is little engagement with communities and that this had characterized the IRP as well,

“The point I'm trying to make is hydro is not interested in meaningful consultation with impacted communities. And that's my belief, how the IRP was developed, designed and narrowed the scope so you don't get meaningful engagement.” (LD, OPCN).

246. And that the locus of influence and decision-making remained in the South,

Why that's happening is because we're not our nations aren't even being involved in any of the discussions that I had within the board, the corporate or provincial boardrooms in southern Manitoba, for the decisions that they're making for the north (RS, TCN).

247. Selective outreach might just be one or two people rather than creating events that the whole community can attend, often elected leaders but rarely Elders and other land users,

“They’ve talked to meaningful engagement, is what they mentioned [in the IRP]. But I don't see it happening here. They get a hold of one person in the community, and then they call it meaningful engagement. Yet we haven't been able to voice our opinion as individual people living in the O-Pipon-Na-Piwin Cree Nation. We’re hardly ever heard, and yet we want to voice our opinion. Once in a while, we have a chance to go to meetings, but very seldom are we asked. Very seldom am I asked to go to a meeting where they talk about energy, hydro development, economic development, and stuff like that. I'm hardly ever asked to go, and yet they say they ask Elders to come. I'm an Elder now, 72 years old...but as an Elder, I haven't been able to represent my community, I. And it's very frustrating to be put in that situation because we're not heard.” (DD, OPCN).

248. The engagement is not genuine, just extractive if information is required otherwise mostly self-serving,

“So that's what this is all about. This is not about helping. This is not about helping First Nations people. This [IRP] is about another robbery. There's another fast one he's trying to pull. I understand already what they want. You just got to talk to our leaders, to talk to the people. Talk to the people that really understand more of this and what's going. Our leaders, our people, especially Elders, they don't understand. This guy [points at another fisher] doesn't even know what a windmill is.” (CM, OPCN).

249. Thus most interviewees had not heard about the IRP before we had approached them about providing any feedback and suggestions, even when peoples livelihoods as fishers might be impacted,

“This discussion’s never even happened within our co-op. I don’t know if it’s ever even happened within our community. I don’t know how many people are aware of this initiative, Manitoba Hydro taking an Integrated Resource Plan. It’s the first I’ve heard of it, and no one’s ever mentioned it to me before but you. A few days ago, when we spoke, I had never heard of it before.” (CC, NHCN).

250. This was especially the case for grassroots,

“I think I think Montreal Hydro could do a better job engaging and reaching out to the grassroots people, like I told you earlier. This is the first time I’ve ever heard of it, and it’s an important issue to find different alternatives, different energy sources, like, like I indicated earlier, our water, our water, our water systems are strained due to development, you know. Manitoba Hydro could do whether it be coming in person or contact public notices, or, or however they plan to do it, they should show people better regard and better respect. As my opinion, they could do a better job in engaging and consulting and interacting with us.” (CC NHCN).

251. As with the Manitoba Minnesota Transmission Project, it seems like northern communities have been left out again. This aggravated by all of the new energy seemingly being unaffected but initiatives taking place thousands of kilometers away,

“My question for the Manitoba Hydro Resource Plan. Is when did it start? When, when did you start talking about this?... You see, the problem is right from day one, us Indian people we are all being left behind. It would have been better if all parties had sat down on the table together. Province, Canada, Hydro, Indian people, based across Canada,. What we discussed, it should be around the table. The four of us, But usually the case all these years, we’re always left behind. The project starts, then we they give us this information. That’s what’s been happening, all these years.” (JO, PCN).

252. This lack of engagement is clear for the IRP but it builds on decades of failed practice and exclusion,

“Yes, they say there’s going to be Indigenous engagement. But there will be problems with that, because they have excluded indigenous communities continuously for the last 60 years” (LD, OPCN).

253. First Nations respondents to both rounds of the survey shared similar sentiments, one questioning whether any meaningful engagement had occurred at all,

“I want to know how this new plan will affect Indigenous communities. And if it will disrupt resource management by Indigenous communities. And if any and all indigenous communities who may be affected are being consulted and if hydro

has an Indigenous circle of paid consultants on board" [R_110WOBlRp0erwG, R2 First Nations, Additional Comments].

Hand picked

254. Many participants indicated that Manitoba Hydro would come into First Nations and then focus on a subset of people who were either open to their ideas or unlikely to resist what they were being told,

"The land users in our community are left out from this conversation and the studies that are being done, they totally hand pick people from the leadership that they take that really at least do what they're doing, what the council is doing, right? Yeah, so they hand pick the ones that defend the Hydro Development Corporation. And they will pick those ones, but not people that are trying to defend, to speak for the land and the people and our waters That's the sad part of it leaves the most educated people out of their choosing. Because they don't want to hear this person's story. Instead, the ones they can manipulate and give money to them."(MG, PCN)

and

"More than one in person meeting"

WNST Survey, R20 (First Nations, off-reserve).

255. This was not only true for in-community activities and outreach but also regarding the management and oversight of Manitoba Hydro and the larger Manitoba government. In doing so they would often defer to the priorities of these outside organizations and lose sight of local priorities,

"I'm sure they have, they have indigenous content in there, but the Indigenous content in there are people that are hand-picked and chosen for the positions in the titles that they hold within those institutions in southern Manitoba, like the Manitoba Hydro Board, they're all hand-picked by the NDP, by the provincial government for their opinions and thoughts on development going forward. Those same opinions and thoughts formulated by the people that are handpicked and chosen by the governments at the time and by the corporations are not of the same opinions and thoughts and ideas of the people who they are supposed to be speaking for, because the majority of the people that are being spoken for do not see it that way, the way that the South says, and the way that the people handpicked and chosen to speak for the people of the North, who represent the South, are not the opinions of the North." (RS, TCN).

256. Such representatives might work against the interest of traditional land users or the community as a whole,

“I’ll give you an example, a perfect example. When, when I was council president at the time. When we were talking about the transmission line and I met with my Trappers Council, and the Trappers Association of my Lake Split Lake local trappers in Spit Lake. And said we would stand united. And I know the people that work for Manitoba Hydro at the time, and I said to them, we would stand united. We won’t communicate with Hydro until we have a united joint effort on what we’re going to do, I told them. And we all agreed upon it, but, but Hydro, they ran to one person. And he, he screwed up our negotiations, because he signed that agreement. Because as Joseph says, and Robert, those agreements are binding after you sign it and affected everyone. And we have to be united in what we talk about and have a joint effort... They did that on purpose, because they, they know how to manipulate people, especially the ones that don’t understand.” (NB, TCN).

257. This might even extend to how meetings are run where any dissenting voices are overlooked or in some cases marginalized,

“As an individual NCN [Nisichawayasihk Cree Nation] member, at one time I’ve been completely ignored. And yet, like I mentioned, a meeting in Leaf Rapids five years prior to 2013 I went to that meeting with my son. They were adults, two of them were adults. We went to that meeting, and they were interviewing people, and they were picking out certain people to be able to talk. And we kept making noise, trying to get the attention to the person that was carrying the microphone. And we were completely ignored at that meeting. They pick and choose who to interview, who to say what, and probably what to say, and yet we have questions. Finally I stood up and started talking loud. I didn’t use the proper language, we walked out of there. But I had to show my frustration because of the way they ran that meeting, it wasn’t right, they had individuals that they wanted to talk to, and they probably gave him what, told him what to say. Yet we had questions trying to represent other people we weren’t allowed to question even the panel, then that’s not inclusive.” (DD, OPCN).

258. Sometimes this handpicking extends from leadership down to the larger community,

“Basically what’s happening, even if they talk to the leadership, and then the leadership go and talk to certain people they want to speak out to the panel at the meeting. And they probably give them the information, what to say. So that’s not a very good inclusion. Because other people are sitting beside that person that’s talking and trying to question the panel or hydro, and they’re being ignored. That always happens right from the beginning, and that’s not inclusive.” (DD, OPCN).

259. Such selective outreach was also the case regarding the IRP, where much of the engagement was restricted to social media if it occurred at all,

“That Manitoba Hydro, in itself, is engaging with communities. It's very selective. From my lived experience, when they choose to engage, I'm not aware if they've approached the community at all about the IRP and engagement, whatever they think it is. I only learned about the IRP through a social media website called LinkedIn when it was published. I don't know if copies have been sent to the communities. I don't know if there's been a request for engagement, and this IRP process is by application. I don't even know if people are aware they could apply to be part of that process. See, I live in the community. We have an agreement with Manitoba and Manitoba Hydro. I've received no documentation on the IRP process.” (LD, OPCN).

260. According to some this outreach is actually declining in scope and impact, and when it does occur it again acts to serve the interests of Manitoba Hydro,

“As long as I've been doing this, and it's most of my life, hydro, process of engagement have gotten worse with indigenous communities. Become hydro has gotten more highly selective on what they want to talk about, who they're going to engage, how they're going to engage. It's almost like they want a predefined outcome without themselves knowing what the outcome is like.” (LD, OPCN).

261. And thus, they would avoid meeting with the larger community, which is widely agreed as the ideal approach. Here an interviewee distinguished between community visits and broader and more inclusive community engagement,

“Hydro visits, they don't engage communities. They impact. And again, they visit selectively. I mean, I've lived experience where I become aware hydro representatives are coming to you, need to address an issue, but they only going to add one, this one thing that impacted the whole community. We're only going to talk to five people. And in secret as or it is in private, they'll say, maybe not secret. I became aware of that, and they broadcast it, and dozens of people would approach hydro say, we have a problem here, and that they had no intention of dealing with the community as a whole.” (LD, OPCN).

Grassroots

262. Interviewees regularly made a distinction between multiple levels of leadership and the grassroots. As one moves down from Tribal Organizations like the AMC or the MKO, down through local elected leadership and finally to traditional land users, engagement becomes progressively less effective,

“One of them being that MKO, these Indigenous organizations being the spokespersons for the First Nations in Northern Manitoba. They do not reach out to the grassroots people. They do not reach out to Chiefs and Councils, not during the time that I sat in Council, to see what we thought about any upcoming talks or developments for the North.” (RS, TCN).

263. An assumption is widely made by Manitoba Hydro that these messages are shared with the larger community but that does not always happen. This is true of both individuals as well as some of the other local organizations such as fishers co-ops, Elders committees and others that advocate for traditional livelihoods and the environment,

“I think they're under the perception just because they talk to our elected leaders, Chief and Council, they feel that that information trickles down to us. But it doesn't because we are a separate entity. We have both status and non-status members within the co-op. We're totally a different separate entity from the Cree Nation.” (CC, NHCN).

264. It is the grassroots who are often the strongest advocates for the land and the livelihoods most dependent on the land,

It's why I say that the Indigenous content is missing. The grassroots people, the voices of the people on the land. Those are what's missing. How do we get it there, our people's voices out there and heard? I don't know.” (RS, TCN).

265. It is critical to develop ways of engaging the grassroots when it comes to inclusive outreach,

“There's a problem of involving people who know about these things and who are interested in the environment. And their economics is gone, you know. These fishers and these trappers and all that, so that's what we need. We need those people to be involved in something in this matter. Like even the public utilities hearing that's going to be done. Those are those are the people who we need over there, not politicians, the hands-on people who go fishing and all that.” (RM, PCN)

And thus extending this outreach beyond leadership to also include the grassroots,

“Go directly to the communities. Go to the residents themselves...not just leadership. Sponsor and attend community festivals/ events”

WNST Survey, R16 (First Nations, off-reserve)

266. This in part would be used to inform the broader community as to any proposed changes.

“Community engagement to all community members so they are informed on any new proposed changes on the services that would be provided.”

WNST Survey, R5 (First Nations, off-reserve)

267. Through a mix of in-person and online meetings, communities could also communicate their priorities,

“Hydro should invite more community members to take part. Those that don't make a profit off of saying what Hydro wants to hear. Holding online meetings that the community on and off reserve can attend and voice their concerns, wants and needs.”

WNST Survey, R38 (Prefer Not to Say, northern).

Manipulate

268. Not only is the outreach often selective, but in some cases there is outright manipulation. In some cases this reflects the way that any agreements are written, providing opportunities for Manitoba Hydro to opt out of their commitments,

“You look at the agreements we have with Manitoba Hydro. It sounds good. It sounds good on paper. But they have all these indemnities in them. The clauses that when Hydro, it does something wrong, we can't go after them. Because of all the indemnity they added on to those agreements, almost every article has an indemnity clause.”
(JH, TCN)

269. Some indicated how agreements ending up compromising the ability of communities to advocate for change,

“I think holding renegotiations is what's needed right now with the '92 agreement and the NFA [Northern Flood Agreement]. There are certain protections in there that are good for us, but others just not being implemented. Like Joseph said, there's all sorts of clauses and indemnity agreements signed into those agreements. That we've signed a wall around ourselves, practically.” (RS, TCN).

270. The kind of outreach regarding the IRP would ideally direct engagement on the part of Manitoba Hydro and the government rather than indirect representation as seen in these interviews and through this report (**Plates 8, 9**),

“Like Joseph said, everything is all fancily written into agreements. But then as soon as it comes to actually honoring the word of the agreements, most of the agreements have been broken or breached already. So, why is it that we're always entertaining how we can do better with the corporation or government. Why aren't government answering any of these questions that you're asking? Why aren't they calling us to the table? Why aren't they asking us how we feel directly? There's too many chains to the. There's too many links to this chain. You know what I mean, that binds us all together. There is so many weak links as well, that's what they prey upon.” (RS, TCN).

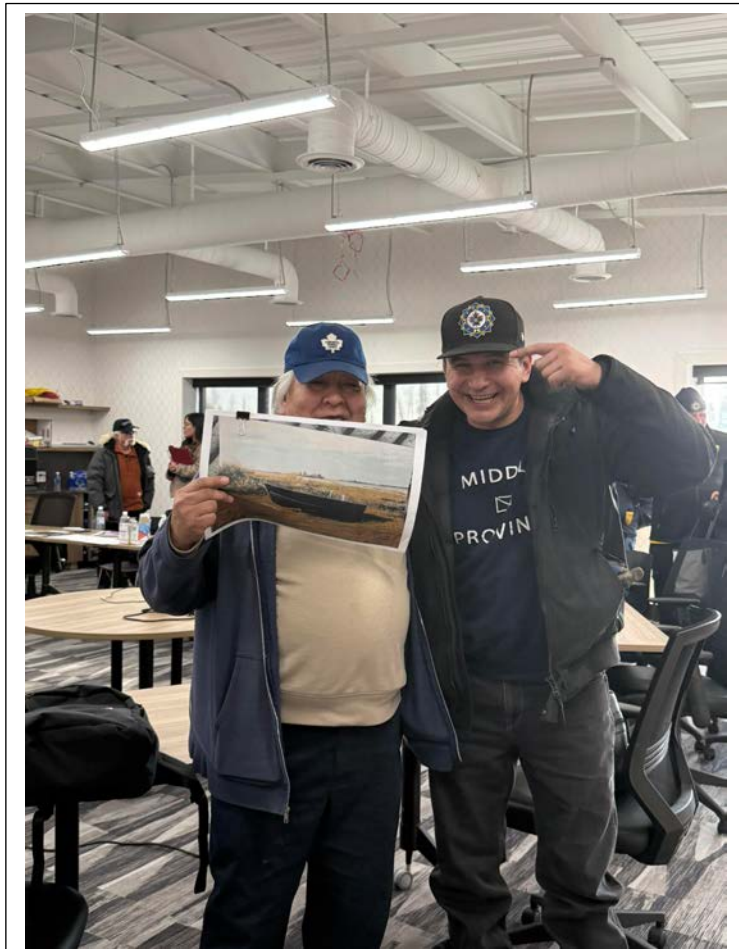


Plate 8: NDP Premier Wab Kinew holding photo by Jackson Osborne of hydro-related decline in water levels (Photo credit: Jackson Osborne)



Plate 9. Liberal MP Rebecca Chartrand holding photo by Jackson Osborne of hydro-related soil erosion and tree fall (Photo credit: Jackson Osborne)

271. By becoming involved, sometimes the information is used against the best interests of any community. Or sometimes the act of engagement and meeting with Manitoba Hydro is used in a way to give credibility to a process that is fundamentally flawed,

“Look at what we're doing right now. Every time we speak, they take our words and use them against us to build a wall around us. That's why Elders said not to say too much. Because they always took our words, our people's words, and used those words to build a wall around them. They're going to take all this information and use it to come up with something that'll speak against what we're saying today.” (RS, TCN)

272. In so doing, these voices are manipulated and ultimately dismissed,

RS: *“Even then, even the voices of the people speaking out will be.”*

NB: *“dismissed,”*

RS: *“manipulated.”*

NB: *“yeah, and dismissed”*

RS: *“even through processes like this that we're speaking in right now. Because a lot of the things that we're saying here right now won't be allowed into the statements.”*

273. Such selective and manipulative outreach then becomes strategic or simply performative,

Why are my tax dollars paying for what is clearly performative transparency?”
[R_332woNnwCGzKzQZ, R2, First Nations, Lives in FN community, Road Map comments]

Economic reductionism

274. Often, Manitoba Hydro is driven by economic priorities that have little to do with community priorities,

“Our community's ferry was not able to run due to low water levels because of Hydro. When our community asked them to be raised, Hydro refused. Hydro doesn't have the northern communities or the environment's best interest at heart. Money is what they care about.”

WNST Survey, R40 (First Nations, on-reserve) (**Plate 4**)

275. Closing down the ferry was done without adequate communication and resulted in York Factory declaring a state of emergency, an otherwise avoidable crisis had Manitoba Hydro elected to release water from its upstream reservoirs (Baxter, 2025). This kind of economics-only thinking is still pervasive through the 2025 IRP,

“Hydro and the Province hold backwater and refuses to work with northern and Indigenous Communities regarding transportation needs and community activity needs. Last summer the ferry service started in June, shut down in July, and did not resume for rest of the season. With no communication to the northern and Indigenous Communities. Hydro and the Province do this to make money for export sales. Reason why do not agree that Hydro's IR plan is done in the interest of Northern and Indigenous Nations and Manitobans.”,

WNST Survey, R41 (First Nations, on-reserve)

276. As a leader from a neighbouring First Nation recognized, Manitoba Hydro was willing to pay any resulting fines and compensation regardless of the deeply adverse implications this decision had for the community,

“they'll do the same thing. An example of that was that low water for York Factory last year, they could, they could have let water out, but it would have cost them money. So they obviously did a cost analysis on that, whether to release water for York Factory or just pay those fines of low water. And it's cheaper for them to pay the predetermined compensation, and they make that decision. Again, it's obvious that they made that decision on behalf of York Factory last year. It is cheaper for them to pay the predetermined compensation of low water than releasing, you know, hundreds of thousands of cubic feet of water. So that they can bring that water level up, so that the ferry can make it across Split Lake.” (CA, FLCN).

A done deal

277. As indicated, the planning and subsequent decisions – notably including the 2025 IRP – have already been made and any Indigenous engagement happens so late in the process that it becomes meaningless and even disheartening to become involved,

“The thing is that the effort from any level of government, the efforts of the churches where the RCMP was involved, the efforts of Hydro and anybody who wants access to natural resources where Indigenous people live. It's like all of you are the government and I'm just a little person and it just doesn't seem - it seems hopeless. No matter what I say today, it's not going to affect anything they're going to want to do. They're going to do what they're going to do, regardless of what anybody says. Because it's been so calculated in how they were going take the resources, and even the land, this, this land, this treaty land, it's not going to be there long.” (LM, PCN)

278. Interviewees emphasized that appearances aside, engagement by Manitoba Hydro is not often or even ever motivated by what is best for communities, whether this is supporting communities as they conduct their own studies or including local voices in any planning or decision-making,

“And that's what I have a problem with. Every report that we do, it's to make sure they check off a box under their license. And I think that's why they're consulting with us as much as they can, because they're being told to. They're not doing it out of the goodness of their heart, and everybody needs to keep that in mind. They're not coming into our communities because they care to the point where they're going to let go of their liabilities and give us what we want. That'll never happen, and in terms of, like I said, allowing us to have more leeway in terms of doing our own studies, that's important to us, not necessarily just fish, but other animals that use that water.” (CA, FLCN).

279. Ultimately, communities need to become less reliant on Manitoba Hydro when working for their own safety or that of the environment,

“Manitoba Hydro, for me, is a complete failure because it does not involve Indigenous nations or communities for us to be able to talk to them. Rather they go make decisions, and then come after the fact. If we had our input prior in what they need, maybe it would be a better solution. But as it is right now with Manitoba Hydro and what it says, I don't trust. Even with the power outs that we have, it was not Manitoba Hydro that I needed right away. It was my leadership that I needed. And Manitoba Hydro should go to leadership and let them know asap what is happening when it's going to be done. Instead of us keeping guessing the safety of our community, the safety of our water.” (JS, OPCN).

Recommendation 12: That Manitoba Hydro’s engagement with northern First Nations seems to be characterized by working only with leadership, if this occurs at all, or with hand-picked community members, rather than working with the larger community and would benefit from being independently reviewed to see how and why it continues to underachieve, what might be done to address such shortcomings, and also what success stories do exist, all of which could in turn help inform future iterations of the IRP.

Community recommendations regarding Indigenous engagement

280. WNST survey respondents were asked “how should Manitoba Hydro better engage with northern and Indigenous communities in the next IRP”. By far, the leading recommendation to “go directly into communities” in person (32%), followed by “equitable and accessible engagement” (23%) and then “meaningful and early consultation” and finally “structural and policy reform”(16%) (**Fig 23**). These will all be elaborated upon below.

281. As important as it was to create opportunities to provide feedback regarding the engagement as related to the IRP, which in turn are not isolated but that reflect practices of community engagement that extend back to the 1960s and 1970s when the infrastructure was first built in Northern Manitoba. But it was also – in a more solutions-oriented way, an opportunity to provide insight and advice to the Board and also to Manitoba Hydro about how future iterations of the IRP and any Indigenous planning and engagement might otherwise be developed,

“Hydro and the Province need to do better to fully and meaningfully engage northern and Indigenous Nation. This is critical, because the generating stations and diversion structures are in the North and directly impact the lives, transportation and culture of the Northern Indigenous Nations. No excuse for not reaching the communities and people in the north. They need to hear how much they impact the lives of the people and work in true partnership to engage, mitigate, co-manage the ongoing IRP in MB.”

WNST Survey, R41 (First Nations, on-reserve)

282. In so doing investing the resources to visit to share information regarding ongoing and anticipated activities in and surrounding the communities,

“Taking the time to come out to each community to present to communities and along with bring and sharing information about projects and other things there surrounding areas.” WNST Survey, R22 (First Nations, on-reserve)

But doing so, face-to-face

“greater community engagement with Hydro speaking and presenting directly to residents.” WNST Survey, R47 (Non-Indigenous)

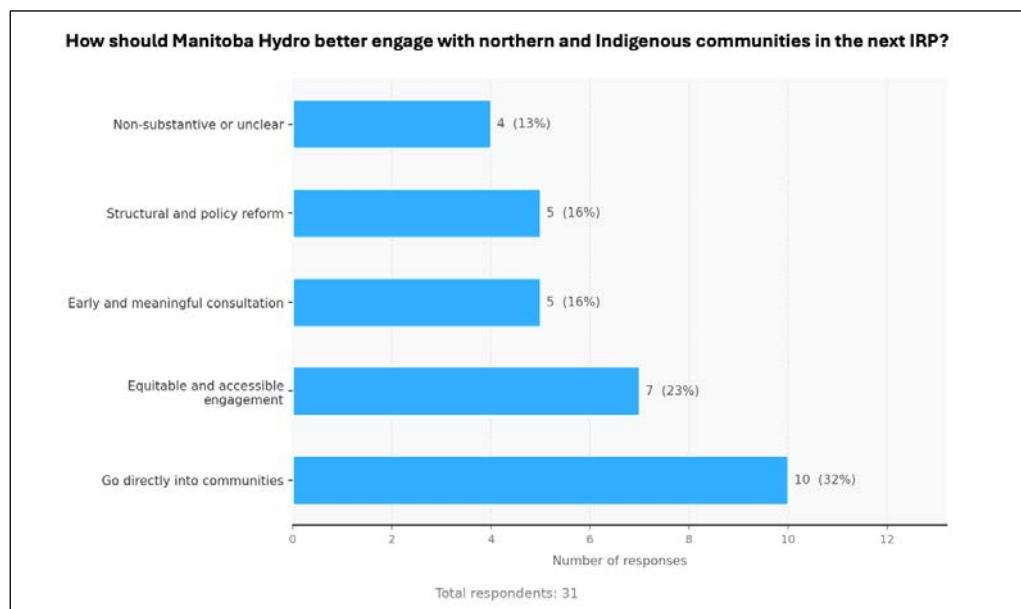


Fig 23. Coded themes from open-ended responses on how Manitoba Hydro should better engage with northern and Indigenous communities. The leading recommendation by far was to go directly into communities in person (32%); N=31.

283 It is key to do so early in the planning process rather than waiting until all the key decisions had already been made, which is still the default process as we have shown,

“Visit the communities before the document is developed so Indigenous Communities are made to feel that their issues and concerns are heard firsthand and taken seriously. Instead of asking for comments after the fact with no guarantee that the issue or concerns will even be addressed.”

WNST Survey, R27 (First Nations, on-reserve).

284. Indeed, there needs to be a mechanism on the part of the provincial government to compel Manitoba Hydro to undertake such engagement if it does not happen on its own accord,

“Indigenous Relations needs to be mandated or directed and fund a plan by the Government of MB to meaningfully engage Northern and Indigenous Nations.”

WNST Survey, R36 (First Nations, on-reserve)

Local willingness to meet

285. What was clear with most of not all the interactions is that traditional land users and defenders are still open to meet with Manitoba Hydro, if given the opportunity to do so in ways that are meaningful and respectful,

“That’s the message I can deliver to you on behalf of all our co-op members. We’re always willing to listen, we’re always willing to work and engage with other parties.”

(CC, NHFN)

And to engage the larger community

“Having community meetings send out pamphlets get people involved.”

WNST Survey, R4 (First Nations, off-reserve)

Willingness on the part of Manitoba Hydro to learn

286. As we have shown, most Indigenous engagement is a one-way flow of information transmission by Manitoba Hydro. Yet there are also multiple opportunities to learn from communities,

“Again. Listen to and learn from. First nations PLEASE, No Means No.”

WNST Survey, R41 (First Nations, on-reserve)

More effective outreach

287. An obvious starting point would be to have more inclusive outreach rather than hand picking who Manitoba Hydro might engage with regarding the IRP.

This would ideally involve community level presentations. Such presentations would need to be in person given the lack of access to Internet and other communications technology,

“I would recommend in the future, or even now, to have a representative from Manitoba Hydro have open talks at a public meeting with all the First Nations involved in this 10 year plan., That would be my recommendation, because, like I said, we all don't get our hydro bills, social assistance, or other social programs, we'll get our hydro bills for payment. Most of us are not internet savvy. Most of us don't have Internet connection here. Most of us are not able to enter the Internet world because we don't have access to a gadget in that. So it would really help us if Manitoba Hydro came in here and did a presentation.” (JS, OPCN)

288. It would be important to ensure that traditional land users were also engaged,

“They should do that. Come in and survey in person, make everybody talk. Have a meeting, talk to people, talk to the smart people that been around for a while. That knows what's going on in this town, I would say.” (CM, OPCN)

289. This would need to be done in collaboration with elected leadership,

“They get a hold of leadership, and then the leadership gets a hold of someone. And then they ignore the people that like myself. They ignore me because I'm vocal..I don't know if the Public Utilities Board or the government, Manitoba government, could reach out, say to an individual. Because they have to reach out to leadership first. That's the problem, they should reach out to people, then reach out to me.” (DD, OPCN)

290. And that ideally the Board might even consider visiting and engaging with community, both leadership and the grassroots,

“I would like to say to the Manitoba Public Utility Board, before you make any decisions, I urge you to travel to these communities and see for yourself what we are forced to be against. Check out our homes, check out our conditions, check out our social programs period. Just check us out in person. Not internet, not Zoom, whatever, but in person. Send a representative here to come and do the work that's needed. It'll be much better for us, much better for you.” (JS”, OPCN)

291. Resources could be developed to facilitate communication, including video but also infographics and other visual means that would be accessible to a wide diversity of community members,

“What would really help even more is if they would build a pamphlet like this [pointing at Wa Ni Ska Tan infographics] and put it in our hydro bills. And explain what they're doing in that rather than just what they have been doing, which is half-assed. And so my recommendation is in-person information sessions for all communities involved, starting ASAP” (JS, OPCN)

292. Proactive training could also take place, including the inclusive training of Elders, to better enable people to use the technology and thus to better engage with planning processes like the IRP,

“One of my ideas is not everybody is keen on technology like grabbing their phone and getting to survey, answering surveys, and downloading this app, downloading the other app to answer the survey. That's where I get stuck. My advice to Manitoba is to train Elders like myself on how to use this technology, because we're completely lost. And that's where they always put the questionnaire for people to answer...I'd like to see some training being done in the community of South Indian Lake, in every community, so that people will know how to use technology that's on their phone, because they don't teach, they didn't teach that in our school...They basically learn by themselves. I'd like to see some teaching done within the community for people that have missed out - Elders like myself.” (DD, OPCN)

293. In so doing, these community meetings would also need to acknowledge and redress any past harms. But this in turn would help with healing and also with more forward-centered approached to planning and to management,

“Everybody needs to be aware that you can't talk to individuals or even one group. It has to include all the groups and have full, meaningful community engagement. Also, that's how I'd like to see things move forward. And I don't believe Hydro or the province is prepared to do that. And the IRP, which is not fully engaging and very narrow in scope, and predicting far into the future is, I think, the term is a “recipe for disaster”. So I would turn that back around. Let's be fully engaging. Let's deal with some of the baggage that we're not allowed to talk about, and let's deal with the reality where we're not bound by depth just to proceed. You know. I really, you know, I think Manitoba and Manitoba Hydro have a debt to the communities that needs to be addressed in order for them to move forward together. I don't think we're there yet.” (LD, OPCN)

294. This outreach and willingness to engage with past and ongoing harms would take place within communities but also with the larger public who are often still not aware of these impacts,

"Manitoba Hydro needs to be honest to Canadians about the impacts of Hydro Projects on First Nations communities (boil water advisories, fishing / wildlife impacts, ice road travel impacts, etc.)." [R1 First Nations, Why Trust].

More than consultation

295. Consultation is an important first step, but there also needs to be a change in the way that this engagement is conducted . Ways that are not as self-serving but are simultaneously grounded in what is important to the crown corporation and also to local community members,

"I feel if they continue along those lines, it'll continue the harms that have been done repeatedly in the past. It's like nothing is changing so but it is a process, and not participating. Sometimes works for Hydro also, and I think they intentionally do that also to limit scope, to limit engagement. And it's like a check box process. Well, we asked. Well, just asking is not enough. You need to fully engage people and communities that you impact otherwise." (LD, OPCN).

296. An approach that would depart from more fixed agreements to be more equitable and inclusive, and ones that are by design adaptable to changing local but also national and even international conditions,

"A better approach to engagement in a process like the IRP, I believe, would include being equals at a table, not just have Hydro or the province visit you to talk about something they believe is good. So if you start out as an equal at a table and adapt to the world as it changes, because we live in a world of changing daily as far as energy needs, You need to have a very fluid relationship and agreement with communities so they can adjust as things move forward. The projects, recent projects, like was Keeyask, are real good example. There's no room for adjustment there, they're bound by an agreement they signed, probably before the project even came online, and I think it's turning out not well for them, but they're stuck with it now, as if they were real engaged partners, they would be able to adjust that agreement, to adapt to the changing needs of the world. Because right now, in a sense, Canada, for sure, is not the world is looking at the energy needs of or the energy producer of Canada. So if you're a partner, you should be able to have the ability to adjust without that demand and the impacts right now, I don't see the IRP doing that. It's looking at the world with rose colored glasses, with a clean slate that's not very clean. There's a lot of baggage there that needs to be dealt with, and predicting a future 10, 20, 30 years, I don't think it's going to work, because they can't predict that." (LD, OPCN).

297. The IRP as a long-term and iterative process that is committed to a 10-year and even 25-year process would have that flexibility to adapt and to be responsive, if this was seen as a priority.

Reduce impacts by managing Northern hydro differently

298. An important outcome of the outreach and conversations that inform this report is using the potential use of the IRP and its South-centered electricity production as an opportunity to manage hydro generation in ways that are less harmful to the environment and local livelihoods,

“In this 10 year plan that you're talking about, if there's a way that they could alleviate the water fluctuation. That it remain, they keep it stable and use the alternate energy to create power instead of using the water level to the maximum augmented water flow program. And then letting it down. It's not natural, so it does a lot of damage to the environment, and probably [takes] longer to recover. There's nothing in the 10 year plan that says they could do that. I'd like to see them try something like that.” (DD, OPCN)

Indeed,

“They really don't think about the system holistically, you know, so you know how, how could, for example, bringing on a whole bunch of cheap solar onto the grid, which would provide a great deal of summer energy, allow hydro to hold back more water in its reservoirs.” [CLM, CAT].

Build capacity

299. As First Nations continue to assert their rights and to develop their own capacities, it is important to support the mentorship of the youth and to create opportunities that they too might become further engaged. And to share the insights that arise from decades of negotiations with the next generation,

“And the other thing I need to do...is I need to start mentoring people, but I haven't found somebody that was willing to commit 100% some of the stuff that I talked about, because to them it's too boring. They don't understand, and then, and I don't know, I think it's just sometimes they, we don't have the proper funding to initiate a mentorship program. It is just whatever funding we can scrape up, and we hire somebody for a little while. But it'd be good if we could get a long-term mentorship program going, you know, with people like myself and the civil engineer, you know, economic development officer, because a lot of us are getting up in our years” (CA, FLCN).

300. Manitoba Hydro provided training and mentorship in the past that could help inform negotiations. Such training and mentorship could be expanded to include environmental monitoring and management but also as it related to planning and future implementation agreements,

“You know, far too many times did we see, you know, outside consultants and lawyers and people like that come into communities from the rest of the world, they get paid up front through the negotiation, and then the implementation of that agreement is not possible, because there's, you know, there was no way of doing it, and you know, basically the communities were stuck with an agreement they couldn't really implement because they didn't have the proper funding and expertise to do all that, so you know, we decided in 1998 that because we're living with this agreement and we have to live with it for the rest of our lives. I think it's us that have to negotiate that, so we let go of all those consultants and we took it upon ourselves, and luckily enough, Manitoba Hydro was willing to send us to negotiating school.” (CA, FLCN).

Be people-centered

301. One approach in this more solutions-centered part of the report was to ask all participants if they had any advice or recommendations for the Board. This leader emphasized the need to engage with community and to be more people centered, when it comes to managing water levels on Split Lake to allow the ferry to operate. Or in this case, to offset the practice of using dams to retain water over weekends, that benefits Manitoba Hydro but that adversely affects community access to travel and to harvest because of low downstream water levels on the Nelson River. People or community centered approaches to water management would help mitigate against such adverse impacts,

“I'm going to make a statement, and before you even finished, I knew what I was going to say. Manitoba Hydro needs to consider the human factor in all this, and how would, how it affects the people when you change something on the water, or you make a build a new dam, it damages the people, it damages the spirit, it damages our connection to the land, and they need to be able to forego saving money to make sure that kind of stuff is looked after. People, an example of that, like I said, with York Factory, how can they run their ferry at low water? What's the other alternative to build a road that's too expensive for them? Same with us downstream of limestone. I don't think that's ever, ever going to change, because they fill up their tub every weekend. And they have a Limestone tub, a Long Spruce tub, a Kettle tub, a Keeyask tub, Kelsey tub, and a Lake Winnipeg tub. And they want to make sure those are as full as they can over the weekend. They're not talking to the human impact that does to us. About how our ancestors cannot do the same thing. Our people today cannot do what our ancestors done in terms of getting in a boat at the crack of dawn and being out on the lake as the sun rises. We can't do that in Gil. The water is controlled by Hydro, and I don't think that'll ever change.” (CA, FLCN).

Collaboration and partnership

302. Nowhere in the IRP is any mention of collaboration or partnership. This is in direct contrast to the much shorter planning document that is informing the Yukon Energy's Road Map to 2050. In their opening message, the Chair emphasizes,

“The partnerships we are building with First Nations and the communities we serve will be at the forefront of our journey. We plan to build infrastructure together, while supporting reconciliation and economic development. We believe that by working together, we can create lasting benefits for all Yukoners, care for the environment, and meet our energy needs.”` (Yukon Energy Road Map, p 1)

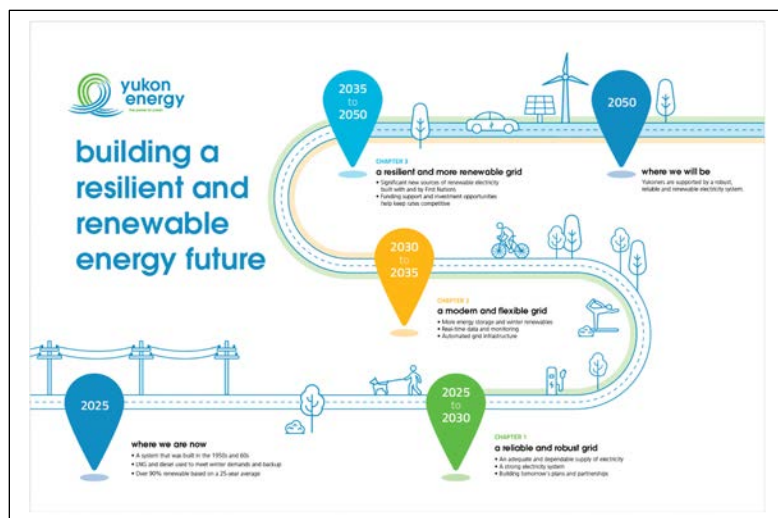


Fig 24. Yukon Energy Roadmap 2025

Yet at least some respondents indicated that Manitoba Hydro is still not willing to do this,

“Hydro not partnering with communities capable of contributing “
WNST Survey, R25 (Unknown)

Outside of formal (limited) partnerships surrounding tangible projects including mega dams and the proposed wind power.

303. An important part of this change is to emphasize the role of collaboration and even formal partnership. Indeed, Manitoba Hydro has extensive experience with formal partnerships including those associated with the Wuskwatim and Keeyask dams. But such approaches can also extend informally into processes like the IRP moving forward,

"Please work with the Indigenous communities fairly if any of this work is on or near their lands. This work is needed but needs to be done in the least impactful way to the environment as well." [R2, First Nations, Road map comments]

"It should be planning with its First Nations partners as they are the ones that tolls the impacts as it effects their way of making a living off the lakes that are being used." [R_5Mmsee91ZJPdsCf, R1 First Nations, Additional Comments]

304. But also has formal partnerships,

"Hydro in my experience and the experience of my people has not been a good one. My mother told me that Hydro destroyed her trap line. Our way of life is always being altered by Hydro. We are always the ones who have to adapt. I would like a partnership that is equal between Hydro and my people."

[R_1imtJRtciTzctBY, R2, First Nations, Road Map comments]

305. These working partnerships would ideally also honour and respect past agreements,

"I believe [that battery storage of 5MW] is not enough and should be increased, plus there should be mention and commitment to Indigenous partnerships and honouring past agreements in the road map and long term plans."

[R_1imtJRtciTzctBY, R2 First Nations, Road Map comments]

306. The IRP should ultimately shift along the Participation Spectrum to one of collaboration,

"I believe that Indigenous partnerships need to be part of the plan and mentioned and incorporated in all," [R_3ptHh4398dfWIIO, R2 First Nations]

Recommendation 13: That Manitoba Hydro begin to incorporate approaches to Indigenous engagement that are people-centered, and that they become willing to learn and to accept responsibility for past and ongoing harms as the utility reframes its Indigenous engagement to be relationship based and to work with the larger communities as it works to incorporate some of the rich insights provided by previously excluded landusers in its management activities and energy planning.

Indigenous rights

307. Nowhere in the IRP is any mention of any Indigenous rights. This is reflected starkly in the survey results: 91.7% of WNST respondents strongly agreed that Aboriginal and Treaty rights should be meaningfully integrated into Manitoba Hydro's next phase of IRP planning, with no respondents disagreeing (**Fig 25, Table 5**). Importantly, when asked directly about the importance of Indigenous communities having control over their own energy decisions, the dominant response (43%) framed this in terms of rights, sovereignty, and self-determination (**Fig 26**).

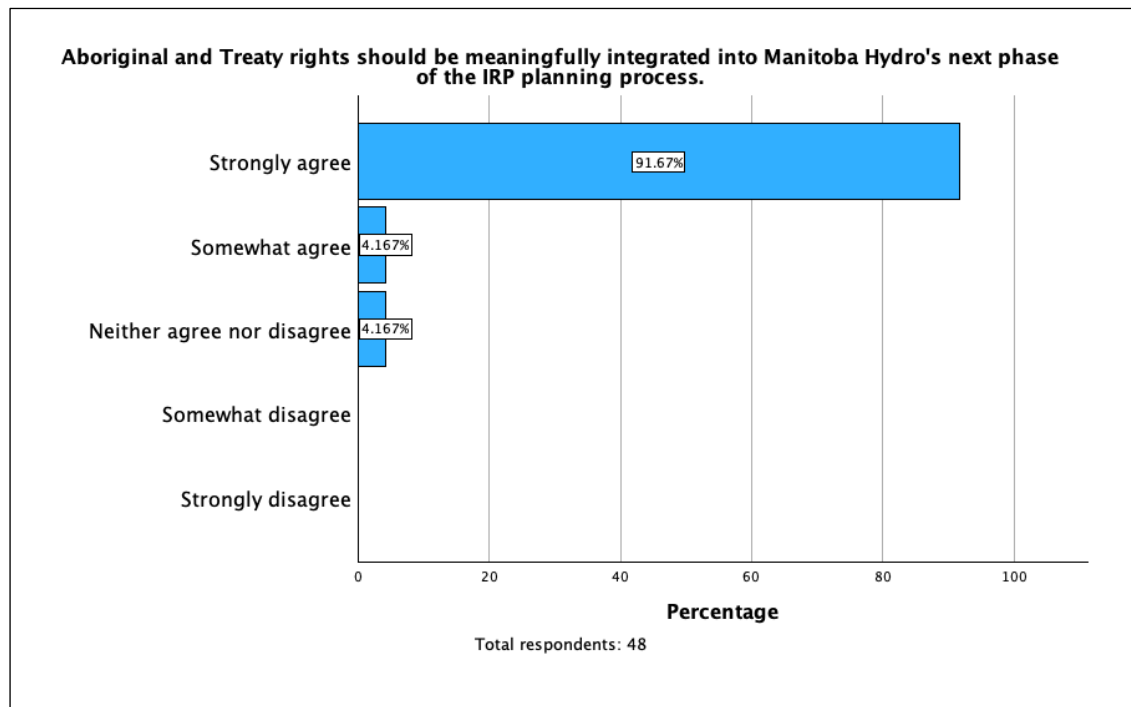


Fig 25. Agreement that Aboriginal and Treaty rights should be meaningfully integrated into Manitoba Hydro's next phase of IRP planning. 91.7% strongly agreed; N=48.

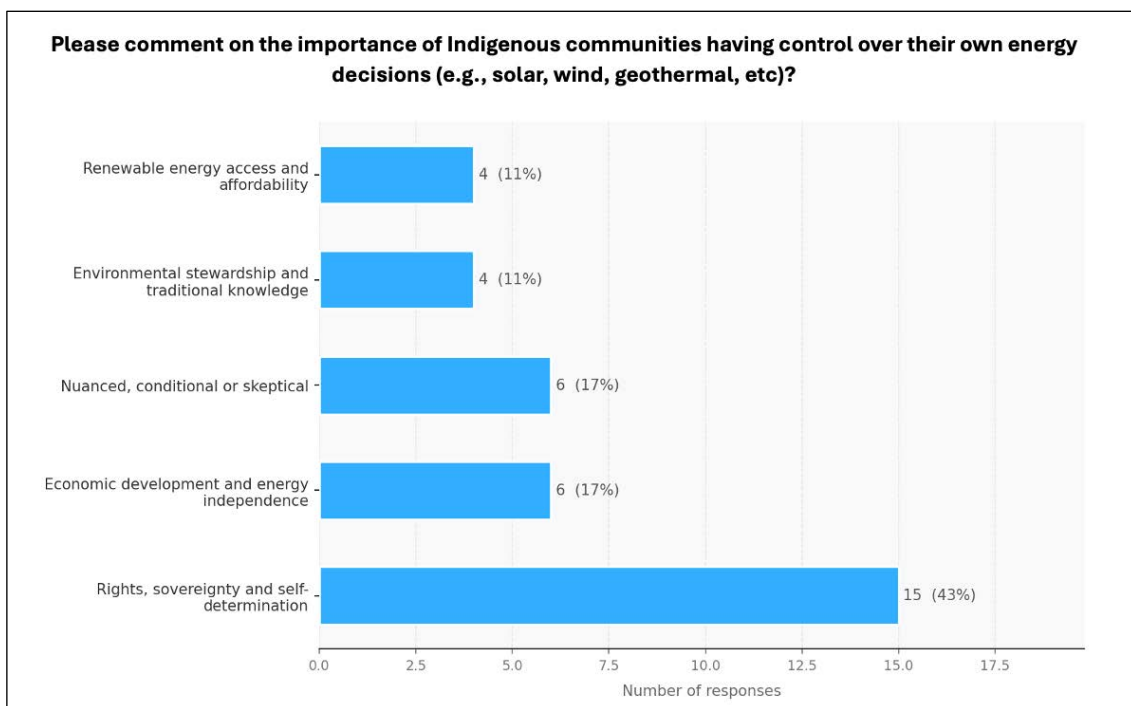


Fig 26. Coded themes from open-ended comments on the importance of Indigenous communities having control over their own energy decisions. The dominant response (43%) framed this in terms of rights, sovereignty, and self-determination; N=35.

308. This is in sharp contrast to the BC IRP as was discussed previously. In that document, there is regular mention of UNDRIP and British Columbia's *Declaration on the Rights of Indigenous Peoples Act* (DRIPA), the first Act in Canada to establish the UN Declaration (UNDRIP) as the framework for reconciliation,

"I don't see Manitoba Hydro working with Indigenous communities. They've taken our sovereignty away from us. They come in destroy our livelihood, and then that basically it. That's taken away our sovereignty. Our land, our ancestral land, taken over to create generators for the public, so they can turn on the light switch. None of them understand, none of the public understands where this light switch comes from." (DD, OPCN)

Many felt that communities should have substantially greater control over energy-related decision-making surround their territories,

"I believe it's high importance indigenous communities have control over their own
WNST Survey, R4 (First Nations, off-reserve)

More so than anyone else involved,

"I believe it's high importance indigenous communities have control over their own decisions no one than the people who it impacts"
WNST Survey, R4 (First Nations, off-reserve)

309. Community-led energy alternatives would help facilitate this

"Naturally, indigenous communities MUST participate in anything to do with events that are happening around the environment and place that they depend on for harvesting food and for sustenance of life. More renewable energy solutions will be beneficial to the environment."

WNST Survey, R17 (First Nations, off-reserve)

This would benefit both the environment and local livelihoods,

"Indigenous control is crucial for them to live decent lives and necessary to protect biodiversity."

WNST Survey, R7 (Non-Indigenous)

310. Manitoba Hydro controlled decision-making has continued to perpetuate this damage

"Hydro has caused significant damage to Indigenous communities and the environment. Culture, tradition, hunting, fishing. Get out of the way and let the people heal by letting them have control."

WNST Survey, R8 (Métis)

In so doing, continues to undermine this control and these rights,

“It is most important as their rights have been circumvented in the building of dams and are stewards.”

WNST Survey, R10 (Non-Indigenous)

And has not undertaken any such changes on their own accord

“So far Hydro has proven that they are not trusted to work with northern communities. Indigenous communities should have control over their own energy as they have their community and environment prioritized.”

WNST Survey, R40 (First Nations, on-reserve)

311. Control over such decision-making is critical for hydro-impacted Indigenous Nations

“Indigenous people have the right to make decisions for their communities on their land. Critical need for the communities.”

WNST Survey, R41 (First Nations, on-reserve)

This key now and into the future,

“It is very important, part of their maturity as sovereign nations”

WNST Survey, R23 (undeclared)

312, First Nations like Tataskweyak Cree Nation are increasingly outspoken about asserting these rights and sovereignty (Wa Ni Ska Tan, 2025)

“Allows each First Nation to assert sovereignty when it comes to having control over their own energy decisions.” (

WNST Survey, R24 (First Nations, off-reserve)

313. Such sovereignty-first approaches and their link to the land are reflected in the larger “Land Back” movement (David Suzuki Foundation, n.d.)

“Land Back”

WNST Survey, R26 (First Nations, off-reserve)

314. An important part of this engagement should make explicit inclusion of past agreements, ones like the Northern Flood Agreement that included five Nations in what some would argue constitutes a living treaty and that focused on Indigenous rights,

LM: *“What do you mean engaging? There is an agreement that they are not living up to, There's nothing that they can do now that they shouldn't have been doing 40 years ago. I am of a mind if somebody slapped somebody with the Northern Flood Agreement. Manitoba Hydro wants to know what they can do to have better relationships, then implement the damn thing.”*

MG: *“Yeah, they pulled out four communities already.”*

LM: *“Yeah, and they're trying to buy us out”*

MG: *“because they told them the NFA was”*

LM: *“but because of people like them, it hasn't happened yet”*

GM: *“was too expensive to implement, it's what they said, they didn't have the money.”*

315. Nations like Tataskweyak Cree Nation have created letters of assertion or sovereignty over their traditional lands which emphasize their rights and control over any decisions that are conducted on their lands,

“ Nobody has given any indication or inclination as to what they thought of our assertion to our authority letter. It's been sent to several different levels of government, both provincial and federal. And within the corporations and all levels of Manitoba, including the Mines and Minerals Branch, Manitoba Hydro, all levels of government and corporations. So it's out there. It's, it's known that we assert our own authority, and under the agreements that said this land to be shared between the four parties. How come we don't even.. how come we don't see that.” (RS)

Recommendation 14: That Manitoba Hydro recognize the importance of Indigenous rights and sovereignty in its planning and management activities, rather than treating Indigenous communities as yet another stakeholder, and in so doing explore ways of equitably collaborating and partnering with communities in future iterations of the IRP as better reflected in both the BC IRP and Yukon Regional Energy Planning.

Indigenous leadership in Manitoba Hydro governance

316. Suggestions also included increased Indigenous representation in senior levels of Manitoba Hydro. The creation of an Indigenous Advisory Committee was recently announced, and while clearly a step in the right direction, it is still unclear how much authority or influence this Committee will have over strategic priorities or decision making,

“Ça prendrait une plus grande représentation autochtone au sein de votre conseil d'administration. Plusieurs de vos questions n'avaient pas rapport pour les autochtones.” [R1, non-identified, White, Additional Comments — French: 'There

should be greater Indigenous representation on your board. Several of your questions were not relevant for Indigenous people.']

Senior Management on the land, not boardrooms

317. It was also communicated multiple times the importance of having senior Manitoba Hydro leadership out in community and out on the land,

“RS: We even had one of the one of the guys, Vice President, at that time. Oh, yeah, that's right. We had Andy Miles in our boat too. And we were with Kenneth Kitchy Kisak on a lake at the time when he said, "Where's all this debris that you were talking about?" And out of nowhere, no word of a lie, man. All of a sudden, a big wind hit. It just started blowing like crazy. And then we had to hide behind an island and go on shore. And after that big wind passed, being maybe about 10 minutes of that big wind, all of a sudden we look out on a lake, and all there's all this debris all over the lake, and all these driftwood and dead heads, your name it. And then Andy Miles looked at Kenneth and said, "What did you do, Kenneth?". "I told God to bring the wind". That's when Andy Miles finally seen what the what we were talking about with all the debris on the lake, I forgot about that.”

IK: Jay Grewell never even visited the communities once when she was president,

RS: you know, like we only met with that president once. After that, she never met with us again after that. And this current president, right now, I don't even think has ever met with this current council. They make themselves unmeetable. They act like as if they're the President of the United States themselves.”

IK: The only way that President will come out to TCN, is make some serious noise, that's the only way he'll crawl out of his den, he's hiding in.”

Create economic opportunities

318. It is also key to design such collaborations and partnerships in ways that generate economic opportunities for communities that often have unemployment and underemployment levels that exceed 90%. This is especially true for local youth,

" Communities like our demographics who struggle to find work and pay hydro plus living 1 hr 30 minutes from amenities make us question why communities like ours have not been approached by the company to help." [R1, First Nations, Lives in FN community, Why Trust]

Speak the truth

319. At the end of the day, one common theme that underlay all such suggestions was the importance of speaking the truth. This truth-speaking by both the community but also by Manitoba Hydro,

“Speak with them on an equal basis - not having highly educated lawyers, engineers, and consultants to speak with people who may not even have post secondary education ... Just speak the truth - how hard is that?”

WNST Survey, R17 (First Nations, off-reserve)/

320. It is this truth-speaking and the associated mutual honour and respect that is essential to establish if future iterations of the IRP are constructed in a way that they address the effective absence of Indigenous engagement and voices in the current document and underlying processes that gave rise to the 2025 IRP,

“So, at the end of the day, they, they pulled it back, and you know, I come to terms with that, and said, you know what, just because we go up against a giant like that, that has all the money, and the lawyers, and everything else, that mean we lose every time if you speak from the heart and you speak from the truth, and you know what you're talking about. I said, How can, how can they, how can they go against something like that? And I learned that's what I do.” (CA, LFCN).

Indigenous energy alternatives

321. Respondents to the WNST survey most frequently identified supporting Indigenous-owned energy projects (81.5%) and making electricity more affordable (70.4%) as priorities for Manitoba Hydro going forward, with increased engagement with northern communities and expanded renewable energy tied at 66.7% (**Fig 27**). When asked which energy-related changes their community should pursue over the next decade, respondents most frequently identified energy efficiency upgrades (78.9%) and installing their own generation, such as solar or wind (71.2%), followed by smart grid or storage systems (59.6%) (**Fig 28**).

322. As indicated here by this Northern First Nations respondent, Indigenous energy alternatives are consistent with traditional values regarding the land,

“Indigenous people are more aware of and protecting land, water, people and elements of earth. They are natural protectors and their knowledge should be utilized. Anyway, less environmental damaging energy should be utilized; solar and wind. Geothermal was a bad experience for us here at home.”

WNST Survey, R11 (First Nations, on-reserve)

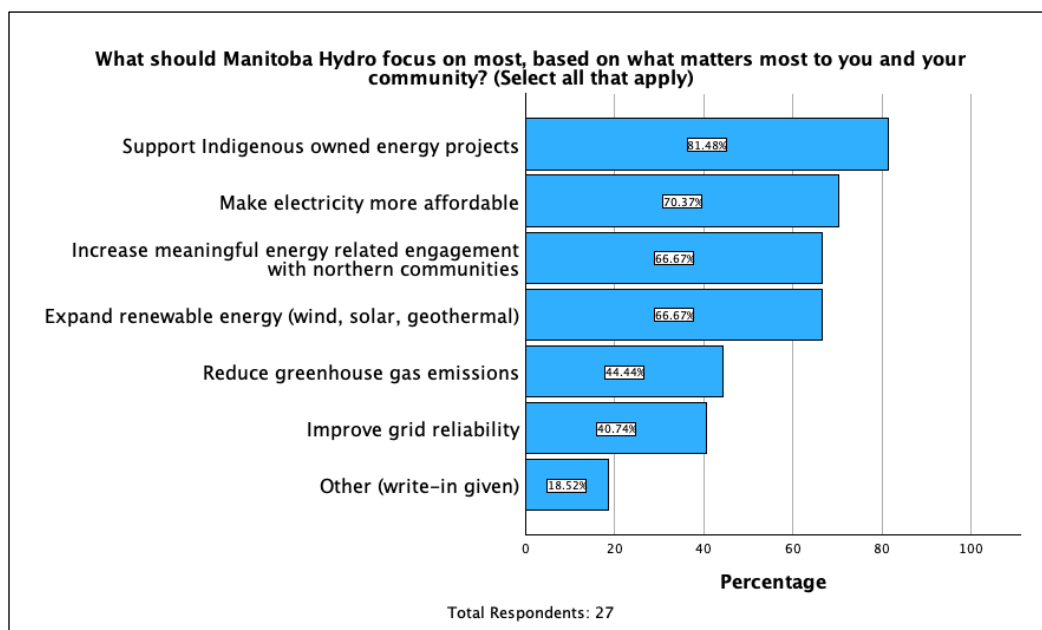


Fig 27. What WNST survey respondents felt Manitoba Hydro should focus on most. Supporting Indigenous-owned energy projects (81.5%) and affordability (70.4%) led; N=27.

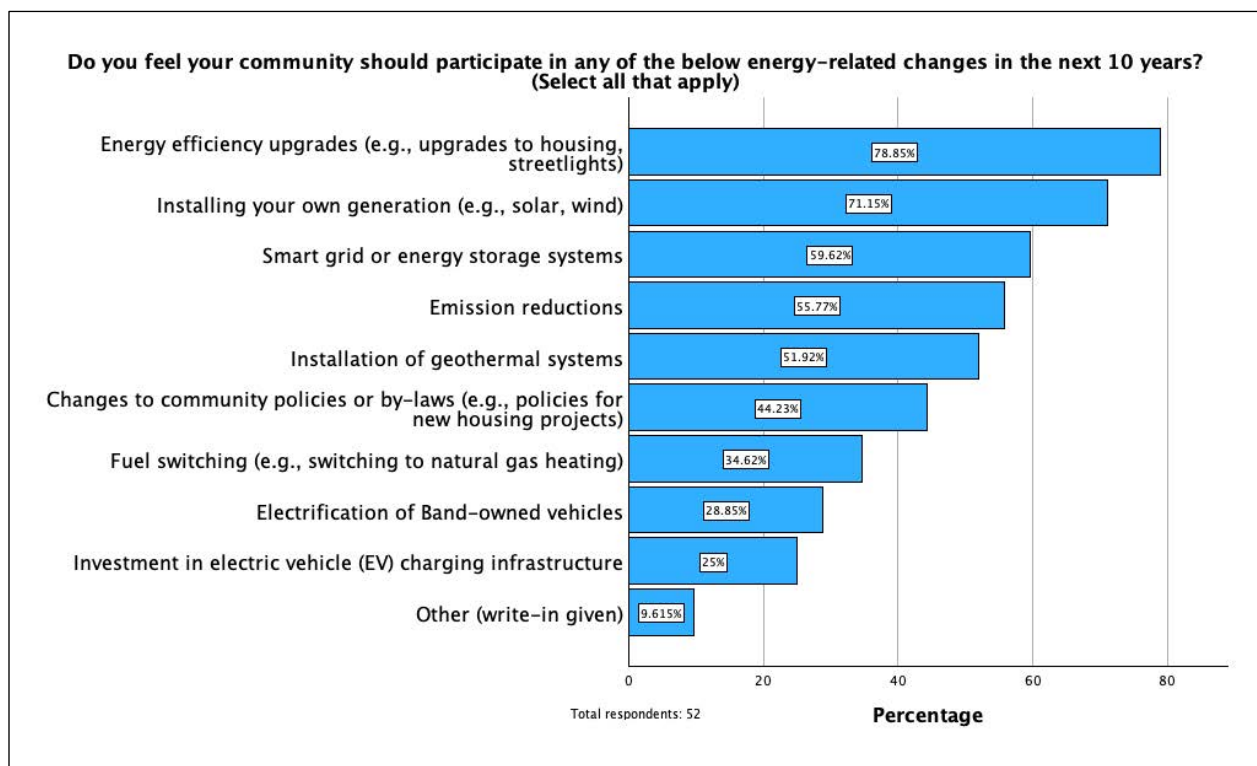


Fig 28. Energy-related changes WNST survey respondents felt their community should participate in over the next 10 years. Energy efficiency upgrades (78.9%) and self-generation (71.2%) led; N=52.

323. However, many of the WNST survey respondents were highly critical of the proposed natural gas turbines

“Plans to build a gas-fired generating station.”

WNST Survey, R10 (Non-Indigenous)

and an increased reliance on fossil fuels in light of an ostensible commitment to net zero and energy transition

“The gas turbines go completely against any plans to move to green energy.”

WNST Survey, R10 (Non-Indigenous)

324. Instead they advocated for community-led energy alternatives that the province and Manitoba Hydro have yet to support,

“I do not support gas turbines. Put money into community wide solar, geothermal and wind solutions for homes and community buildings first. The province has done a terrible job of organizing these programs to serve Northern needs and culture.”

WNST Survey, R6 (Non-Indigenous).

325. In the context of the 2025 IRP the only reference to economic reconciliation was in relation to Indigenous majority owned wind power,

“We support the advancement of reconciliation in Manitoba and will continue to engage with Indigenous Nations and communities in our future energy planning process and community-led energy planning.” (2025 IRP, p25)”

These would be located in the southern portion of the province and be designed to provide electricity to the grid and a call for proposals was launched in 2025. There is much purported interest on the part of the MMF and Indigenous organizations like the MKO.

“Indigenous-owned alternative energy is progressive and most needed.”

WNST Survey, R47 (Non-Indigenous)

But to do so in ways that are community-led

“I have mentioned already in previous comments ! Solar and wind ! Use what nature haves to utilize without harming the environment!”

WNST Survey, R26 (First Nations, off-reserve)

326. Some First Nations have been reported to have responded to the call including Swan Lake First Nation and Fisher River First Nation (Kemp, 2026; McDowell, 2026).

Although northern First Nations could hypothetically be competing for these opportunities, they face a double bind. The first is the direct impact of hydro production on their local livelihoods and the second is the further impact on responding to investment opportunities like mega wind power.

327. That said, many respondents indicated that this commitment to energy alternatives should go beyond wind power and support community led alternatives that would help mitigate against ongoing harms and better reflect the idea of economic reconciliation,

“I think that they shouldn’t just support Indigenous majority owned wind projects. Should be supporting any Indigenous alternative power projects that fit the specific communities needs. Could be a part of economic reconciliation for the harms done by MB Hydro to our communities.”

WNST Survey, R29 (First Nations, on-reserve)

Again, this at once working for northern communities without compromising on a provincial commitment to net zero,

“Seems very unbalance. Battery storage and hydropower upgrades and more indigenous projects that help support northern Manitoba. Don't understand funding a gas powered fossil fuel plant. That seems counterproductive, if we are trying to move away from oil and gas; would rather funding go to support renewables.”

WNST Survey, R52 (Métis)

328. Indeed, once having taken care of their own local electricity needs and making use of lower cost and more reliable energy, they could sell any excess back to the grid,

If communities had there own electricity, they could create enough to sell back into the market.

WNST Survey, R20 (First Nations, off-reserve)

329. When asked what else they wanted to share about alternative energy in their community, WNST survey respondents again most often voiced support for solar, wind, and other renewables (33%), followed by infrastructure and service concerns (24%) and the need to do so because of climate and other environment related emergency (**Fig 29**).

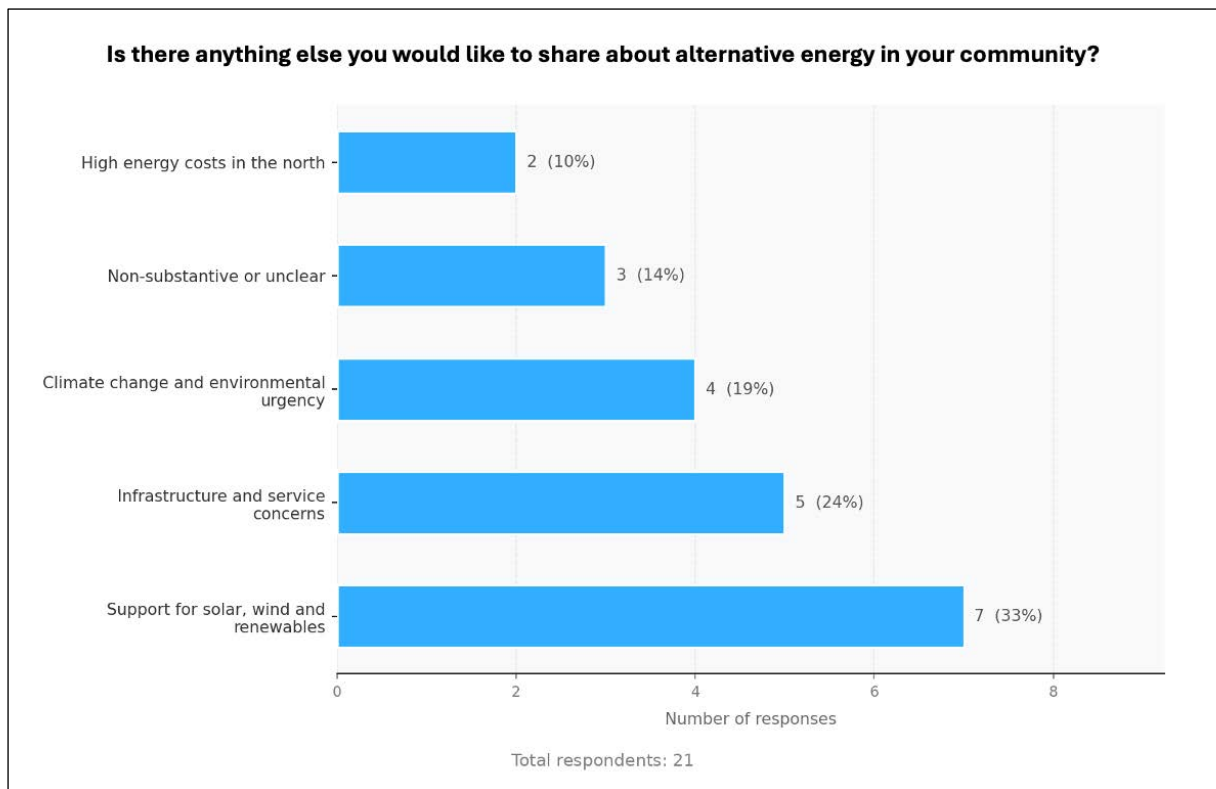


Fig 29. Coded themes from open-ended comments on alternative energy in respondents' communities. The leading theme was support for solar, wind, and other renewables (33%), followed by infrastructure and service concerns (24%); N=21.

Hydro-related lack of capital to invest

330. Unlike the South, the economies of many hydro-impacted communities have been decimated by hydro production, which in turn affects the ability of those Nations to take advantage of investment opportunities like wind power as reflected in the IRP,

“They probably have their own economy that was never destroyed down south. They probably have farming or mining or whatever they have. It wasn't affected by Manitoba Hydro, but ours was affected. Our economy, our people were destroyed. So how are we going to be partners with Manitoba Hydro. It costs billions of dollars or millions of dollars to be partnership with wind turbines and solar energy and stuff like that. So we don't have any money in our coffers or pockets, whatever you call it. So how is that going to happen? I don't see it...We just have to scratch and survive.” (DD, OPCN).

331. One participant suggested that such Nations might be preferentially treated or have access to additional compensation programs in light of that devastation,

“If we need capital, then Manitoba Hydro should really start talking to us about the and the province and the federal government should really start talking to us about compensation for the damage that they have done and continue to do even without proper licensing. And that should help in the financing of this windmill for our First Nation.” (JS, OPCN).

332. Indeed, because of this inflexible and generic nature of the IRP, there is little ability for the planning to adapt or respond to the needs or inequity associated with hydroelectric production and the above mentioned double bind,

“ We can participate, possibly in wind farms, but our capacity to participate has been diminished because they've destroyed our economy, which means we don't have the resources that will be required to participate. So the answer would be, no, I don't see the IRP or any process at this point that will allow us even to participate, because the harsh reality is we can't due to the oppressive nature of Manitoba Hydro and the Manitoba government.” (LD, OPCN)

Recommendation 15: That Manitoba Hydro and Manitoba address the hydro-related loss of livelihoods and the economic base of hydro-impacted communities by exploring ways that subsidy programs could be used to enable such Nations to invest not only in mega wind power but also in other smaller scale energy infrastructure, especially for communities whose local economies have been devastated by a hydro-related collapse of fisheries, hunting and trapping.

Relevance to the North?

333. RS: *“Nobody would write mine would get an EV vehicle over here. They're not made for a cold climate”*

JH: *“seen a truck in Thompson that was an electric truck, they told me that it wasn't, it didn't last very long in cold temperatures, it wasn't. They said it wasn't late for the cold, cold weather, right?”*

RS: *“the size of the battery, it wasn't getting the total amount of charge out of it”*

JH: *“It was rated for 400 kilometers, but in the cold weather it's not even a third of that. They can't even go a third of the 400 kilometers in cold weather,”*

Small scale:

334. As indicated above, local-scale and community-led renewable alternatives have special appeal and promise for many northern Indigenous communities, \

“I believe MH has the best interest of all Manitobans at heart, including myself. However, as a First Nations individual from the north, I see opportunities to further strengthen this commitment. There are various energy solutions, beyond wind and solar, that could be explored in partnership with First Nation communities. With MH's support, these initiatives could have the potential to be successful, even if

this support may extend beyond MH's traditional scope or obligations." [R1, First Nations, Additional Comments]

335. Yet, Manitoba Hydro claims that this was not the intent of the IRP which is assumed to focus on centralized energy sources controlled by the utility company,

"The second very critical point to understand is to back up and try and put your – wrap your head around what the IRP process was intended to achieve. It is not intended to achieve or select or pick individual small scale projects in a various variety of portions of our province; that is not the objective. It is to look at the larger need in the province and to develop utility scale projects or resources that will fulfill that need. So, getting down to the level of individual projects wherever they may be in the province is not appropriate for this IRP review proceeding."

Brent Czarnecki, Manitoba Hydro Counsel, Pre-hearing meeting, p137-138

336. This attitude of course dismissed the idea that both such programs are feasible and indeed desirable through an IRP, but that they continue to be ignored by Manitoba Hydro

The IRP doesn't consider all alternatives, more of the bigger glossy ones, wind, solar, yeah, fine. But there's also smaller alternatives for local communities, local economies to consider, like wood heat as a small example. I know some people have a concern about that, but that's fine too. And there's also natural gas, geothermal retrofitting. Simply put, these could create a surplus of power, so, but they're being ignored under the IRP. They probably should be looked at. Even smaller scale run of the river, hydroelectric power (LD, OPCN)

Despite serving very different functions in the energy system,

"Hydro has a multi decades tendency of downplaying wind power and solar power, both, you know, each of which serve different functions in the energy system." [Climate Expert, Interview]

337. This in turn is aggravating the damaging impacts of environmental decline,

"They are dragging their feet on solar and wind power and are in opposition to healthy waterways."

WNST Survey, R7 (Non-Indigenous)

Yet the promise of this technology is generally questioned by Manitoba Hydro,

"yeah, they don't, they don't, they don't encourage us to do anything like that. And basically, when we talked about solar and stuff like that, you know, Hydro's quick answer was that might not work, because it's too cold sometimes. So they were kind of shooting those kind of things down, and then we talked about geothermal. Well,

you know what, that's not always guaranteed either, you know, kind of thing. A, so basically they kind of say stuff like that. I don't know if it's a personal opinion with that person or it's an official thing, but they tend to downplay the importance of those other ones, probably because we're surrounded by hydro development up there. I don't know if that makes sense.” (CA, FLCN)

“They just systematically devalue it in their planning process by arguing that it can’t contribute to peak wintertime demands.”

[CLM, CAT]

338. This lack of support is especially the case for northern communities,

“The province has done a terrible job of organizing these programs to serve Northern needs and culture.”

WNST Survey, R6 (Non-Indigenous)

339. Indeed, the largest solar farm in the province is located in Fisher River Cree Nation. Similarly undermined by Manitoba Hydro at every turn when it was built in 2020, it continues to be undermined today,

“We have the largest solar farm in the Province and we cannot have access to the power generated and feel Hydro is ripping the community off with its power purchase agreement.”

WNST Survey, R27 (First Nations, off-reserve)

Instead of supporting these local scale alternatives, the IRP relies on a natural gas turbine

“Don’t understand funding a gas powered fossil fuel plant. That seems counterproductive, if we are trying to move away from oil and gas; would rather funding go to support renewables.”

— R3N · Métis

340. But small-scale energy alternatives such as solar can also operate successfully at the family level if adequately supported as evidenced by a project piloted by Wa Ni Ska Tan in a hydro-impacted First Nation,

“We had a solar panel test here, one solar panel provided energy at a cabin, we used it as an example that dams are not the only answer to providing energy.”

WNST Survey, R11 (First Nations, on-reserve)

341. Such programs could benefit from support by Manitoba Hydro and even the demand-side energy conservation supported by Efficiency Manitoba.

Relevance

A number of northern First Nations have taken the lead on small-scale alternative energy projects including solar, geothermal, and biomass. One of the leaders in this regard is Fisher River Cree Nation, who heat one-third of their houses on reserve with geothermal and who have the largest solar farm in the province. Not only do these initiatives provide the Nation with relatively inexpensive and reliable electricity but they sell any excess back into the grid,

“Fisher River building the one megawatt solar farm, which still is the largest solar installation in Manitoba, and it was the first utility-scale solar installation in the province.” [CLM, CAT]

341. Such smaller scale projects are more economically feasible and have immediate benefits for community members who live on reserve,

“ We [O-Pipon-Na-Piwin Cree Nation] have a ways to go before we get there. These bigger projects that are suggested in the IRP might not be the way to go. We probably need a smaller scale to get participation buy in, as they call it - by the communities and the individuals. So to have a community say, well, you're going to invest X millions of dollars on a project in the south Southern Manitoba probably won't go over well, and might not even be achievable for a lot of communities, because they won't realize or experience the immediate benefits having a promise of a check, As it called, far into the future. I mean, that's it's just it's not real. You have to have almost immediate effects, immediate benefits, employment, revenue, you know, so and that doing a hands on community project like Fisher River is a good example of that.” (LD, OPCN)

342. These in turn have both desirable environmental benefits but also providing for local jobs,

“Despite the fact that they have relatively small resources, you know, because they see this as a combination of reducing emissions, but also reducing costs, improving quality of life, building, you know, green employment.” [CLM, CAT]

343. This made available to land-based camps,

“Yeah, there's Minister Camp, there's Recluse Camp, Oil Lake Camp and Assean Lake Camp. They would benefit in solar power, If I were to recommend anything for reserves, it would probably be invest in a windmill, a wind turbine.” (NB, TCN)

344. The power would be inexpensive and reliable,

To ensure that our needs are met electrically, in order for us to keep our communities going, would be to recommend to Manitoba Hydro to put in a wind turbine. It would be

cost efficient, it would be easier, it'd be here, it would require no fly-in. we could train our people to be able to operate the wind turbine, and in the end it would save us costs, it would save us sleep, so we wouldn't have to worry about if the power goes out, it would be automatic, and that, and it would just save us a lot of worry (JS, OPCN).

345. And any excess would be sold by the Nation back onto the grid,

“If our people could be partial owners and whatever energy we don't need for ourselves, whatever surplus energy there is opportunity for us, I can. It's a win-win for both parties.”(?)

Recommendation 16 That Manitoba Hydro build on the strengths of its proposed Indigenous majority-owned wind power to explore how to better support community led energy alternatives that are not only now technologically viable but that would make a huge difference in quality of life in Northern Indigenous communities in ways that would recognize and address ongoing harms that reflect the power of reconciliation as presented by the Truth and Reconciliation Commission.

10.0 Risk Analysis

346. WNST respondents identified climate-related impacts (85.1%) and rising electricity costs (82.9%) as the risks they most associate with Manitoba Hydro's energy planning decisions over the next decade, followed closely by environmental damage from new infrastructure (74.5%) and exclusion from decisions about projects on or near traditional lands (72.3%) (**Fig 30**). Additionally, when asked about the energy challenges they currently face, respondents most often cited unaffordable electricity bills (76.7%), lack of access to renewable energy options (72.1%), and inadequate or energy-inefficient housing (67.4%) (**Fig 31**). These as participants indicated below,

“The IRP is looking at the future with rose-coloured glasses. But anybody knows who thinks about that, that's a wrong approach. You need to deal with reality. So there's huge risk for everybody, not just the northern communities who are being asked to invest in these projects.” (LD, OPCN)

“There's a lot of things that are not being considered. They want the big home run. Well, there's a huge risk going for home runs. History has proven that in this province, the recent hydroelectric, They thought they'd be home runs there - they struck out.” (LD, OPCN)

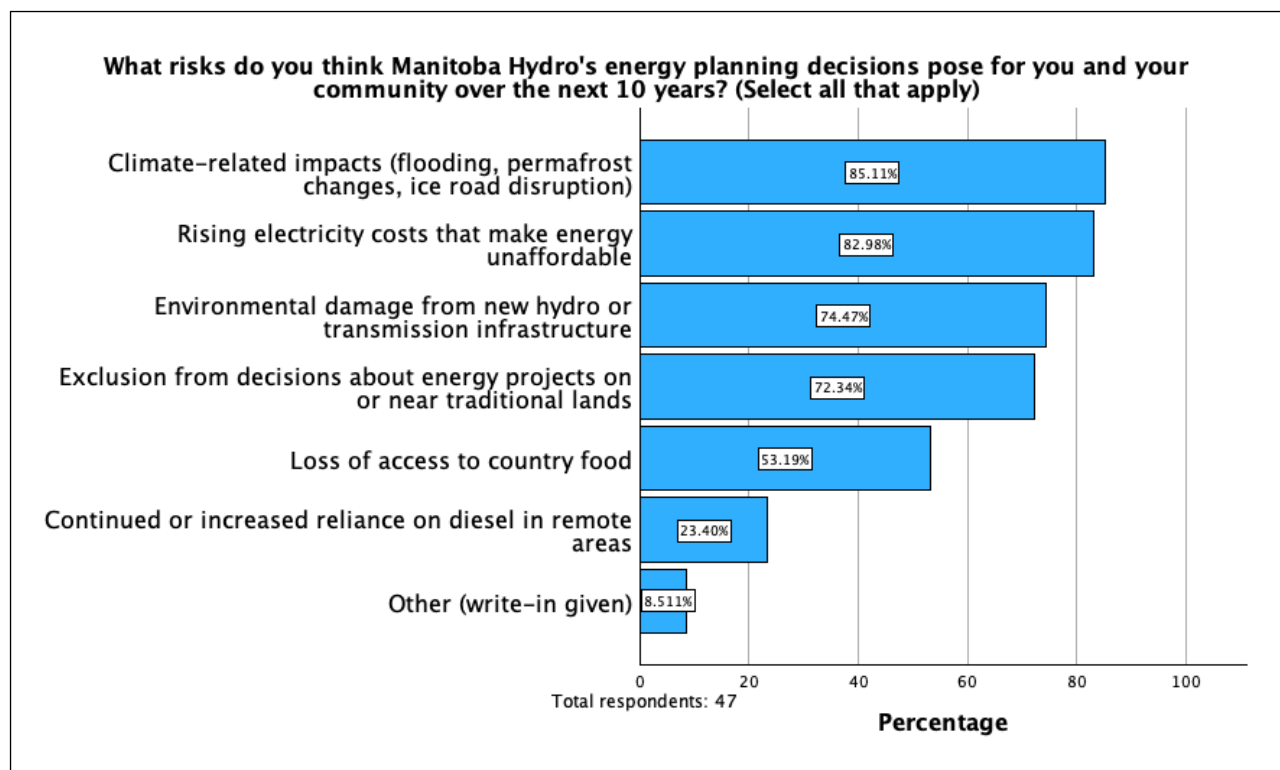


Fig 30. Risks WNST survey respondents associate with Manitoba Hydro's energy planning decisions over the next 10 years. Climate-related impacts (85.1%) and rising electricity costs (82.9%) led; N=47.

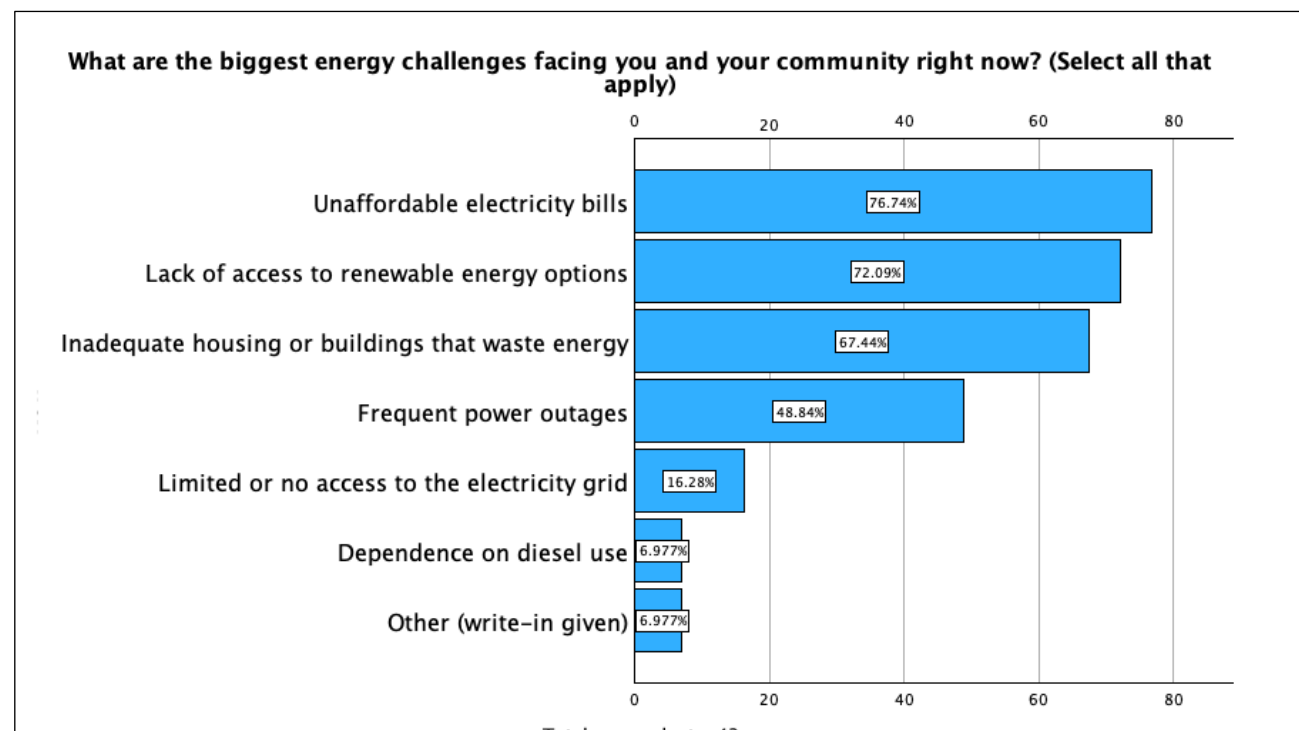


Fig 31. Biggest energy challenges currently facing WNST survey respondents and their communities. Unaffordable electricity bills (76.7%) and lack of access to renewable energy options (72.1%) led; N=43.

Manitoba Hydro's inability to predict

347. One participant was highly critical of Manitoba Hydro's ability to predict complex issues into the future, this also being true for the IRP,

"What are you doing? You know, it's a check box process, in my opinion. For what gain, I don't know. So what's the end result? I don't know. It's not clear what the end result to me is with the IRP and knowing hydro, the history of it, and there. Are forecasts and where they're wrong a number of times to you know, they wrong on their projections that harm us, yet they go about their merry way and try again, you know? So, yeah, that's my impression of the IRP process. And, you know, I don't think it's a meaningful document. For one thing, any projections of hydro are suspect because they're usually having bias to their wants, not necessarily dealing with the reality of the world, even so." (LS, OPCN)

348. Should this be the case, it has substantial implications for the IRP and the size of the investment it represents for the province,

"The Churchill River Lake Winnipeg Regulation diversion sent 60% of the natural flow of that river so it could be used for hydroelectric generation. Despite that massive engineering feat the system is unable to provide the hydroelectricity needs that are forecast. Are you sure that you have it right." [R2, Northern, Road map comments]

Economic

349. This same participant points out the size of the current Manitoba Hydro debt, and its assumptions and predictions that its revenues and profits were to have substantially greater than any that have materialized along as have the costs of its various builds,

"Manitoba Hydro, from my experience, has a very poor record of success of its predictions. I mean, look at more globally, as they say, they're over \$25 billion in debt, and most of that has been incurred with their new developments over the last two decades. And they predicted more positive results as far as revenues and profits that haven't been materialized. All of their projects, I believe have come hugely over budget, double the cost of what was predicted, right from Wasuwatim, which I believe was double its predicted cost. Keeyask came in over \$9 billion dollars, if I recall correctly. The hydro building on Portage, which I believe shouldn't I mean, it's like a tombstone for us, at least from my perspective, came in 30 or 40% over cost. You know, just about everything they touch. The Manitoba, Minnesota transmission line came in over 1 billion on projected costs. I might be wrong on those exact numbers, but safe to say, all of their projects come in over cost on their projections, their revenues are not materializing." (LD, OPCN)

The assumption is always that the economic benefits are going to be substantial along with the social benefits, including employment for First Nations, especially in the North,

“But then, if you'd listen to Hydro, well, there's going to be economic benefits. Well, how is that? If there's a potential mega wind farm in the south and you're investing in it in the north, how do your people get even employed in that? I mean, the projects, the recent projects, moss, I don't believe provided the economic employment benefits that where they were promised. We definitely didn't get those jobs. I witnessed myself firsthand, people from other provinces, loads of them being flown directly to the job sites. Yet they wouldn't provide those opportunities to us locally in the North. We didn't have those avenues... The end result, some of those projects don't employ the number of people after the project is complete, I believe there's only one person from NCN working at Waskwatim, even though it's in their traditional territory, on their waterways, down the road from their homes, it doesn't provide the employment that's promised.” (LD, OPCN)

350. Such economic uncertainty has substantial implications for Indigenous organizations and communities investing as Partners as has been the case with Wuskwatim and Keeyask, especially for communities who often have to borrow funds that they can then invest,

“Loaning money to community to participate without knowing the outcome is dangerous ground. And I think communities are leaning they will have a huge debt load that they're probably unsure how they or even future generations are going to pay off. So there's a huge, huge risk associated with that that's not well broadcast and probably not well planned out. I would be hesitant to borrow money from Hydro to participate, because the gain might not be guaranteed. As you know, I think the reflection with Waskwatim and Keeyask is the gains are not there as they were promised. The projections are not materializing, and hydro doesn't want to deal with that. So they're going along the same, potentially the same path, where, if you don't have resources, we'll loan it to you. And a lot of people might jump at that but having learned that might not work out well for future generations” (LD, OPCN)

351. That these investment opportunities are a thousand km away just adds to this uncertainty and risk,

“It becomes harder for communities to invest in a project further away from their community, like you're talking over 1000 kilometers for a potential wind farm in southern Manitoba. And yet they're saying we'll have opportunity there. Well, how you know, those details are not there. So they're asking us to commit to a promise that realistically probably won't materialize.” (LD, OPCN)

That the communities are now in substantial debt just adds to their risk if any profits fail to materialize and should the debts then be called,

“Profits are unsure. Energy demands are changing. The world is changing. Yet they still have the same business plan, it seems. And yet it has failed over and over again. Financially, you don't get \$25 billion in debt by being right all the time. That's a reality and a risk that's not being talked about. And let's say, as an example, a community is promised loans to participate. Well, that debt load that's already being carried by the province is a real thing at some point, it has to be paid. How will that impact a loan guarantee you get, or a loan. Will it be called in at some point to cover that massive investment? That's a concern, that's a risk I would want to learn about, talk about but nobody wants to talk about it.” (LD, OPCN)

Political risks

352. Some of the political risks and uncertainty are associated with changes in policy and regulation, such as Bill C226, the recently passed anti-environmental racism bill that represents meaningful implications for Manitoba Hydro as it relates to northern hydro production,

“There's been a recent Bill C, 226, passed legislation in 2024 and there's no indications by government, the Manitoba government or Manitoba Hydro, how they're going to implement Bill C, 226, and that's to address environmental racism practices. So again, there's another. A clear indication of no change status quo will reign. That's very, very concerning, knowing that our political representatives are aware these are problems. They're aware legislation exists, that they have to address it. Yet there is no plan, there's no framework, there's no timeline on how to address it. So proposing projects 10,20, 30 years or diversification, saying we're going to do things better yet. They're not dealing with existing legislation yet. They're saying things will be better. There's a huge gap there. And again, I believe it's status quo where northern indigenous communities will bear the brunt of the environmental impacts.” (LD, OPCN)

353. Another reality are the many lawsuits that have been levelled at Manitoba Hydro regarding these same issues, and the risks that these represent that are not indicated explicitly within the IRP

“Manitoba is not addressing the lawsuits. Hydro basically doesn't want to talk about it. Yet they exist, which is a risk to the IRP if we're looking on that narrow scope. So they need to be talked about. They need to be addressed. A balance needs to be found. There is balance out there, specifically like Churchill River Diversion, with licensing and the claims we've filed against hydro, there's a balance there we can strike. But again, Hydro doesn't want to talk to the people that are being impacted. Yet they're asking us to believe in them, to invest in them, if you don't talk about talk to us how we supposed to invest and believe in Manitoba Hydro and Manitoba.” (LS, OPCN)

Climate

354. Many participants spoke explicitly about the substantial changes in climate that are taking place in the North, many of these interacting with the changes in hydrology associated with hydro production. The IRP's assumptions are that hydro production will remain largely unchanged does not take any of these impacts, ones that will only get worse over the next 10 or 25 years,

“The availability of water, especially with global warming and climate change. Hydro and Manitoba cannot always rely on a constant source of water, especially when what with what we're seeing right now, with the drought going all the way to Northern Alberta, Saskatchewan, Manitoba, even in the south. The weather patterns are changing. Water is not readily available as it used to be anymore. Hydro can't produce it out of thin air.” (RS, TCN)

“Why is Hydro spending so much money on being able to come up with certain with models on predictions of what the rivers are going to be like in the future with climate change, at one time I think about 10 or 15 years ago, I was reading up on some of the stuff that Hydro is doing, and how the I kind of remember that that that article that I was reading, but it's how Manitoba proposed to look at energy efficiency into the future, and they said that there would be less. Their scientists that they hired said there would be less precipitation in the summer and less snow in the winter. That's what they predicted in that article that I, that I read a long time ago.. Trying to figure this stuff out, and as you, anybody who's in science would say they're probably using their best hypotheses, best guesses - fancy word for best guess. They're trying to figure out, figure out what the water, what the water regime is going to be like into the future.” (RS, TCN)

355. Indigenous science shows that there is already substantial declines in precipitation that in turn adversely affects water levels,

“We know that there's going to be less water because of what we're seeing happening now, and the severity of the storms and the weather bombs happening. Just all out of whack. Like even we seen hardly any snow this past winter till this spring. If that this spring snowfall didn't happen, we wouldn't have had as much snowfall. And then the water also, the water, it wasn't until the spring happened, is when the water levels rose, but they were starting to drop until the rains hit again” (RS, TCN)

356. This uncertainty should at least be addressed in the IRP,

“So the water issue is very unpredictable, and for Hydro to say, for the next 20 or so more years, that their ability to produce power at the rate they're producing right now will be stable and be the status quo going into the future. I don't think so, man. Things

gonna have to change, especially with the way they say you're not supposed to talk about the environment.” (RS, TCN)

357. Such climate related changes also have substantial implications for the availability of wildlife and fish populations and thus for traditional foods and livelihoods,

“It's going to get worse, and the hardships I'm going to be relief. Well, we're going to feel it as a people in general...where I grew up is the animals, I'm gonna be different. The plants are going to be different. I'm not going to eat the animals that I ate eating now or ate 8, 20 years ago, And that taste is not going to be there and everything will change, we're going to be eating like they grow meat in, in factories as we speak.” (NB, TCN)

This participant was more concerned about the impacts of and uncertainty around climate change than any others that had been discussed,

SM: *“If you were going to make a recommendation to the to this public utility board around everything that we've been talking about, like if you were just magically situated that you could make a recommendation to them around all of this. What would it be? Is there anything that comes to mind?”*

NB: *“Climate change, make a focus on climate change. for the well-being of the North, and the people from the North try to try to reduce algae and the toxin we've had lower water levels over the last five years, and it just doesn't make sense to me. We've had significant snowfall and a bit of rainfall, and I can't seem to understand why the water is always low every spring... In my opinion, this has different factors from what I can judge... You know the how the hydrology is being altered within our waterways and Mother Earth is telling us something.” (CC, NHFN)*

358. The impacts of these changes are real. it represents two levels of arrogance on the part of dominant society, and in this case Manitoba Hydro. One it that is such climate impacts are occurring at all, and the second that no one is doing anything meaningful about it,

“When the water fluctuates...the water's dry, what does Hydro say? “There wasn't enough snow, there wasn't enough rain, it becomes a drought”. They call it climate change. Climate change comes from the white man's mouth, not even from the Indian people. The Indian people, Elders say, the great spirit sees everything. If the White government is not going to respect the land and water, the Great Spirit will do something. It will help Mother Earth. It is going to send thunder, lightning, hailstorm. All these things will be so costly to us compared to wars. This is what the Elders are saying.” (JO, PCN)

359. Part of the latter ignorance is that very little is known about such impacts or its underlying causes including the ongoing melting of permafrost in Northern Manitoba. Moreover, very little is being done to rectify this through monitoring or research on the part

of Manitoba Hydro. Ideally modelling efforts would address some of these gaps by incorporating Indigenous science in partnership with northern First Nations,

“It's my belief that this time that climate change is not being fully addressed in the IRP and having local knowledge, your immediate knowledge of hugely devastating project on your doorstep, and the practice of non-monitoring or self-monitoring or already ignoring things like climate change,. Because in relation to Manitoba Hydro, they move huge volumes of water. A question is, how is this affecting our climate? I don't believe it's being monitored or studied or addressed And there's other huge factors. But they might say, well, those are minor issues, like the melting of the permafrost in northern Manitoba. How is that effect on climate? Well, I see the immediate effects on the on the shore. The permafrost is melting, literally under our feet and entering the waterways, you know, through erosion and that yet that's not being monitored or addressed. How is that affecting the climate? The water quality, obviously, is going down or is bad, and just moving massive volumes of water or retaining it. It has to have an impact on the climate, yet there's no process to monitor it or address it.” (LD, OPCN)

360. In many cases it is northern Indigenous communities who pay the price for any failures to model the impacts of these climate associated risks,

“I don't believe the IRP actually addresses climate change, and some of the modeling that may be taking place, or has taken place, again, from my past experience, is usually modeling based on hydro wants and needs and not dealing with reality like when it comes to power generation and demand...It's very in house and very based on their wants and needs, which usually doesn't deal with reality...Also, the people doing this modeling never even see the impacts of their decisions. So it's a lot of paper exercises. If they fail, we face the brunt of those failures. They just plug in a new model and keep going. So this, I think the same result is going to come with climate change, because they're not dealing with it, they're not dealing with impact.” (LD, OPCN)

361. That such climate impacts are only going to get worse was brought into sharp focus with the wildfires that swept across northern Manitoba last summer, these wildfires being aggravated in both scale and impact by the ongoing “dewatering of these landscapes” by hydro production,

“As far as climate, the immediate climate is going to get worse if a process like the IRP doesn't identify them or address them. We already had just last year, huge wildfires in northern Manitoba, and some of these areas where wild, fair spread rapidly, was in areas that were dewatered by Manitoba Hydro. So, and I think that concern was raised by First Nation leaders and communities. You know, release some water so we can use it, right? That's a very broad statement, but it's true. We have areas that are flooded continuously reservoirs, and they have immediate

adjacent areas that are dewatered, like the lower Churchill River. If you dewater an area, a region, an environment, wildfires will spread rapidly.” (LD, OPCN)

362. Such impacts were widespread across the province,

“Long term climate change is bringing changes. Last year the lake and rivers were so low, it was frightening. My boat sat in mud where the lake should have been. I am very afraid of an extended drought and its effects on Northern rivers and hydro generation. Individual and community green technology is a better answer than more fossil fuels.”

WNST Survey, R6 (Non-Indigenous)

363. The combined impacts of climate, hydro-related dewatering, and mismanagement on the part of Manitoba Hydro are already having devastating impacts on northern Nations,. The utility company responded to the drought in summer 2025 by holding back water in reservoirs upstream of York Factory First Nation, which in turn made its ferry inoperable and resulted in a state of emergency being declared

“Our community's ferry was not able to run due to low water levels because of Hydro. When our community asked them to be raised, Hydro refused..”

WNST Survey, R40 (First Nations, on-reserve)

364. Narrowly focused on peak load impact, Inflow variability as affected by climate change was not addressed as a formal risk category,

“Climate risks identified for the 2025 IRP included changes to inflows, extreme weather conditions (including floods or droughts and compounding effects like wildfires), and economic risk. While climate change also has the potential to affect demand projections, previous studies conducted by Manitoba Hydro confirm that the impact of these changes on capacity expansion planning decisions for the Manitoba Hydro system are expected to be limited in comparison to the potential impact of changes to inflows.” (Manitoba Hydro response to WNST/MH I-19, April 15, 2026)

Legal, regulatory, political risk

365. Not only are legal actions in of themselves a source of legal and economic risk, they in turn can sour the very same relationships between Manitoba Hydro and northern Indigenous companies that are so key for the Partnerships being proposed under the IRP to work effectively,

“These are huge risks that are, I don't think, being fully analyzed or fully addressed. You know, you have baggage. I mean, there's court cases filed against Manitoba Hydro really recently. How is that going to affect so-called partnerships? If your partner is taking you to court, how is that a healthy partnership? If your proposed

partners already have an existing claim against you, how you know what is the outcome of that? And that's real.... So, I mean, those are all tied politically. I mean, obviously, if clear direction is give given for meaningful positive change, then it probably happened. But that's not, that's not the direction right now, it seems to be. If it's not clear direction, status quo is okay for government, which isn't for us.” (LD, OPCN)

Recommendation 17. That Manitoba Hydro build on the strengths of its quantitative modelling and its use of Evaluation Metrics in the 2025 IRP by expanding them to include place-based climate, economics, and political risks and uncertainties identified by northern communities and their Indigenous Science, which will only strengthen the predictive capabilities of these models

11.0 Customer-side solutions

Customer-side solutions at the program level

366. Similar to the above socio-economic theme, and how the equal weighting method of evaluation Manitoba Hydro applied to it does not properly account for Wa Ni Ska Tan’s constituency, the risk evaluation framework did not focus on community level outcomes,

“The primary consideration for the risk analysis was the overall performance of the Energy Efficiency Programs and their ability to achieve the levels and timing of demand response and energy efficiency described in the potential development plans. Emphasis for risk assessment was on current program level outcomes and initiatives focused on increasing uptake informed by Efficiency Manitoba at a broader, program level, and not at a segmented, community level.” (WNST-MH I-16 pp1-2)

367. Thus, northern and Indigenous communities that face significant structural barriers to participation in customer-side efficiency and demand-response programs were not the subject of any discrete risk analysis in the plan selection process.

368. This connects to Q6 in the OIC (12/2026), which asks whether Manitoba Hydro's consideration of supply-side and demand-side resource options was appropriate. A framework that applies equal consideration to each of four themes and each sub-metric within themes, while containing no criteria sensitive to the specific circumstances of the constituency most directly affected, cannot demonstrate that it has appropriately considered those options in light of all relevant input.

Customer solutions and First Nations

“Efficiency Manitoba’s indigenous programming... in 2025/26 they budgeted \$5.59 million on indigenous programs, specifically, and that is of \$89.5 million... so it’s, it’s not much.” [CLM, CAT]

369. The treatment of customer costs and customer benefits are unclear in the Cost evaluation metric. By hiding behind a 'provincial average' perspective, MH downplays the extreme energy poverty and unique infrastructure costs in the North, failing to recognize that meaningful 'customer benefits' for Indigenous communities must include economic restoration and energy sovereignty, not just a balanced system spreadsheet. This is borne out in respondents' own descriptions of their housing situations: renters cited rising costs and a lack of control over efficiency upgrades (23%), and a further 20% described energy costs as simply unaffordable regardless of housing tenure (**Fig 32**). A 'level playing field' approach fails when one group (Indigenous peoples) is starting from a position of systemic economic disadvantage that a generalized metric cannot capture.

370. Some respondents felt that these demand-side energy conservation had relevance in northern Nations,

“ more meetings in the communities , on how we can better our living conditions , and produce lower rate hydro , retrofit all the older houses in the communities, build new stackwall housing , or some different type of heating systems , heated floors and so on” WNST Survey, R51 (First Nations, off-reserve)

371. Despite limited institutional support, WNST respondents reported already taking steps to conserve energy in their own households: 87.6% somewhat or strongly agreed that they had done so, including sealing drafts, upgrading appliances, or reducing heating and cooling use (**Fig 33; Table 5**).

372. Some felt that these priorities could be combined with others including green technology,

“Absolutely! Northerners suffer the highest costs due to poor quality housing but have the least access to green technology. However, the Chief is not the community. The band members must be consulted.” WNST Survey, R6 (non-Indigenous)

373. Others felt that demand side conservation was still important but eclipsed by more pressing matters, in this case cell towers and reception,

“They should have final say on this type of infrastructure coming into their communities for example in mine we don't even have cell service yet more remote areas have cell service so before anything else we should have cell service.”

WNST Survey, R13 (First Nations, off-reserve)

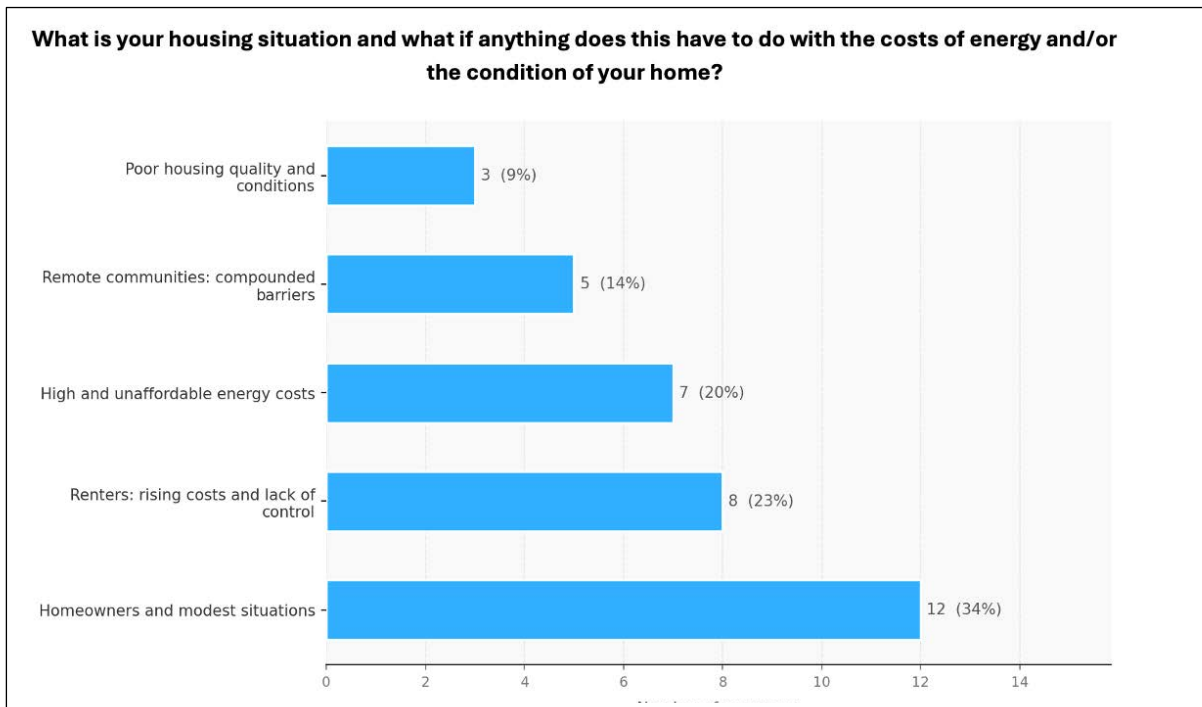


Fig 32. Coded themes from open-ended descriptions of housing situation and its relationship to energy costs. The largest group were homeowners describing modest situations (34%), followed by renters citing rising costs and lack of control over upgrades (23%); N=35.

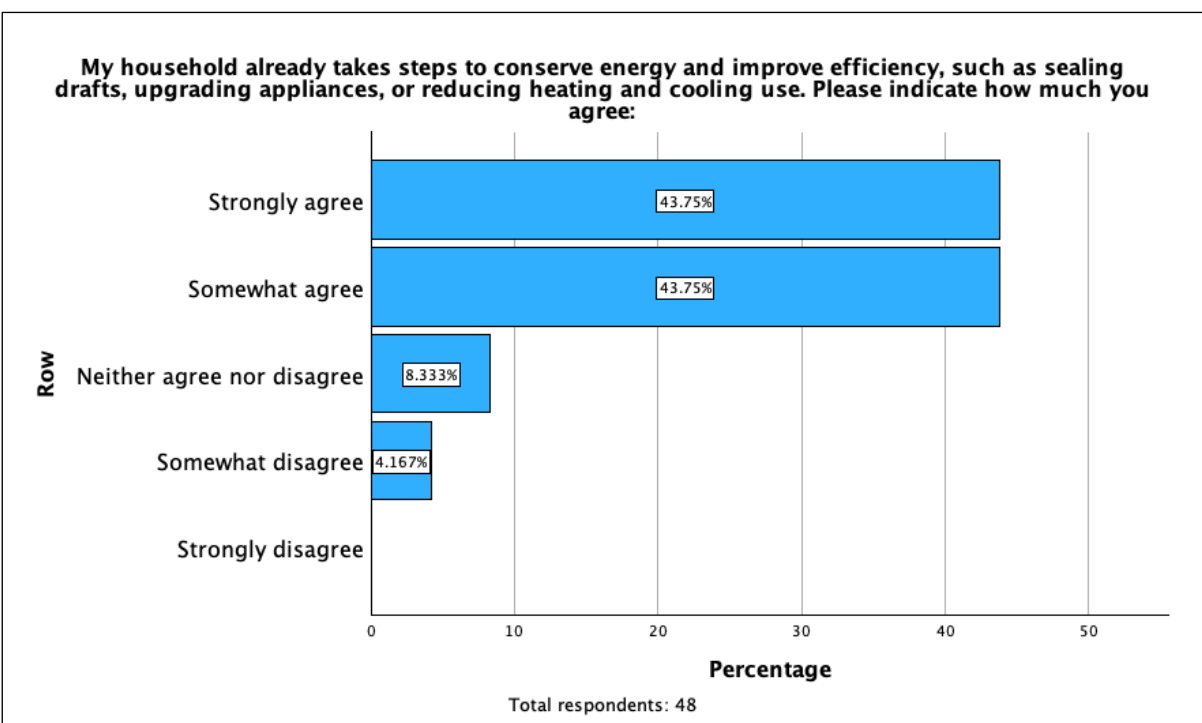


Fig 33. Household energy conservation practices among WNST survey respondents. 87.6% somewhat or strongly agreed they already take such steps; N=48.

374. The untenable housing situation in most First Nations is brought into sharp relive in communities such as Misipawistik Cree Nation and Fox Lake Cree Nation / Gilliam where you have substandard Indigenous and well-funded Hydro housing side-by-side,

“...the division between the Hydro community and the Fox Lake community is very, very stark and obvious and terrible, which I know I don't need to tell you guys, but yeah, housing.. I wish I wish it was easier to sort that out, because it's ridiculous that there's the waiting lists that there are on some reserves, that the housing is built the way that it is, that the lack of accountability of some of the people who've just come in and done bad jobs.” [TAC Member, WNST Interview]

375. Some survey respondents similarly pointed out how inferior the housing provided by Indigenous Services Canada (ISC) has been and that there are very few supports in place to respond to new and evolving housing needs.”,

“Housing units are built with ISC very limited resources we receive for housing. Hydro takes long to power up the new units. Had to wait 8 months for one of the buildings to get hooked up. Power outages in the northern communities takes days to be restored.”

WNST Survey, R41 (First Nations, on-reserve)

The design and construction of the housing is inadequate to begin with, but this is aggravated by widespread unemployment and poverty in many communities,

we don't get any of those things Like what was just mentioned drafts in doors we throw a blanket on it, windows plastic if we can afford it come on get real look around at our homes we do our best to maintain them but it's hard when you have four or five families all living together and only one gets hydro money every month to pay the bill! We are not rich (money) people you cause Hydro is government, keep all our money then make us fight over the rest.”

WNST Survey, R45 (Prefer Not To Say)

376. The crisis and injustice that exists in many northern First Nations puts many of the assumptions underlying demand-side energy conservation in these contexts into doubt,

JH: “you're talking about that stuff there, efficiency stuff. It's just like putting nice doors on a cardboard box. We don't have those kind of homes around here.”

WH: “they ain't built for efficiency around here, right?”

RS: “They only build what they can afford. and most of the houses that were built back in the day by Indian Affairs were substandard homes.”

SM: “And is mold a huge issue?”

RS: “it's a huge issue in all the reserves, First Nations reserves, especially here”

IK: “molds less than a year showing up lately.”

RS: “I'm surprised you even have to ask that question.”

377. Notwithstanding the systemic issues that plague most First Nations as highlighted in these interviews, respondents to the WNST survey did find some use value in extending these demand-side energy programs to some northern communities at least. Yet, despite some interest at least, such energy efficient programs seem to be largely non-existent,

“yes -so where are these things in our community? I don’t see any! no one gets these things or I would have it to! “

WNST Survey, R45 (Prefer Not To Say)

Some argued that such subsidy programs would help offset high rates,

“We should have access to these types with affordability. At minimum, to offset high energy costs.”

WNST Survey, R27 (First Nations, off-reserve)

Indeed, rates often exceed \$400/month in northern households

“Hydro rates are too high compared to the southern communities. Some housing units pay as much as \$400 per month and that's way too high for the northern residents.”

WNST Survey, R5 (First Nations, off-reserve)

378. Subsidy programs could help make these energy efficient services and products available in northern First Nations,

“Provide and promote energy efficient services and products.”

WNST Survey, R11 (First Nations, off-reserve)

But that these programs should not be seen as isolated from community-led energy alternatives that could similarly help reduce the cost of electricity,

Focusing on customer-side efficiency solutions is good, because this reduces overall energy demand. Other than that, I am concerned about the lack of proposed investment in green energy projects, particularly those developed by First Nations

WNST Survey, R23 (Undeclared)

Recommendation 18. That Efficiency Manitoba conduct a public review of its existing Indigenous-centered programming and identify any successes and gaps and in so doing co-design energy efficiency initiatives with Indigenous Nations that at once recognize and adapt to the substandard condition of existing housing, that build local capacity and employment opportunities in this sector, while also making such options accessible to any interested Nations and community members.

12.0 Conclusions and Recommendations

379. In closing, I have integrated my own training and experiences as a scientist with the insights that arise from the 2025 IRP, MH survey data and meeting summaries, and responses to IRs submitted by Wa Ni Ska Tan and other interveners and associated MH responses, a critical literature review, a case study of the BC IRP, the outcomes of interviews conducted with members of northern hydro-impacted First Nations as well as other external experts, and the outcomes of our online survey that focused on members of Indigenous communities in northern Manitoba.

380. I have generally found the 2025 IRP to be highly problematic in many ways, in large part because it has effectively excluded northern Indigenous voices from the IRP. Although I have been highly critical of the latter, especially as it related to the value that the First Nations insights might have made in the 2025 IRP and the reality that it reflects longstanding shortcomings of Manitoba Hydro when engaging with these communities (McLachlan 2014a). I also attempt to explore how these insights might be factored in during future iterations of the IRP.

381. Indeed, the larger IRP process represents a way of addressing past and existing harms related to hydro but in a future centered way that might be addressed by collaborating with these First Nations in future iterations of the IRP and in part by complementing the Indigenous mega wind power that is highlighted as economic reconciliation with more community engaged energy alternatives as well as more relevant approaches to demand-side energy efficiency that would represent a combined win for both northern First Nations, Manitoba Hydro, and indeed Manitoba.

1a) *Finding*: Although there were some major strengths in the 2025 IRP, not least the opportunity to construct a comprehensive and integrated energy plan for Manitoba for the next 10 years, it suffers from some substantial shortcomings, most notably as it related to Indigenous engagement, the focus of this report, but also some missed opportunities when it comes to assessing risk and uncertainty, community led energy alternatives, and demand side energy efficiency all of which would benefit hydro-impacted First Nations, Manitobans, and the regional environment alike.

1b) *Recommendation*: That Manitoba Hydro conduct a comprehensive and critical review of its own regional energy planning as it relates to the human-centered approaches including public engagement, Indigenous engagement, community-led energy alternatives and demand-side conservation, and that it makes this review public especially to northern Indigenous communities.

2a) *Finding*: The Order in Council (12/2026) provided by Manitoba played a key role in focusing the 2025 IRP Public Utilities Board Hearings, but effectively alienated Indigenous communities, especially those that are hydro impacted from the review process. Wa Ni Ska Tan was able to circumvent this through our longstanding working relationships with

hydro-impacted Indigenous Nations, but it was a difficult experience for communities that would otherwise have been interested in participating more actively in the process.

2b) *Recommendation*: That the restricted scope presented by the OIC (12/2026) be repositioned to better enable Indigenous participants to engage in the process by being able to speak to past and ongoing impacts as they relate to future iterations of the IRP. Not doing so ultimately excludes them from sharing what they know about the past, present and future when it comes to energy planning and alienates them from being meaningfully engaged in the planning process.

3a) *Finding*: An important – and unanticipated by the author at least – was that many participants were highly supportive of the IRP and its focus on South-generated electricity production as related to Indigenous majority-owned wind power and even natural gas turbines, not necessarily because they would benefit from any investment opportunities but rather because this shift away from the province’s dependence upon North-generated hydro production might reduce the current stress on northern ecosystems and First Nations and their livelihoods and wellbeing alike

3b) *Recommendation*: That Manitoba Hydro explore how and to what degree stress on both northern ecosystems and trauma on Indigenous communities might be reduced by the IRP and what management decisions would be required to enable this change.

4a) *Finding*: Our interviews and survey, and indeed Manitoba Hydro’s survey, show that wildlife and fish populations, notably whitefish and Lake sturgeon as well as some traditional medicines, are in decline which in turn has threatened these culturally important species and the livelihoods that depend upon them. This is especially true for the freshwater industry, which has been effectively eliminated from many impacted First Nations. Yet there is also a tremendous local capacity to monitor any recovery of this system associated with the IRP should Manitoba Hydro change its water management practices as the South generated electric production comes online.

4b) *Recommendation*: That the implications for a reduced reliance on northern hydro production potentially arising from the IRP and its focus on southern energy should be documented in collaboration with community through future IRP cycles, especially as it relates to the anticipated resurgence of the traditional use wildlife, fish and medicines and in turn traditional livelihoods and community wellbeing.

5a) *Finding*: Public engagement related to the 2025 IRP was directed and controlled by Manitoba Hydro at all stages. This includes engagement with the general public through two rounds of surveys, surveys with Interested Parties, surveys with Indigenous leadership, and the use of a Technical Advisory Committee. Restricted to the lowest participation levels (information provision, consultation) according to the International Association for Public Participation’s Participation Spectrum, it is best characterized as inadequate both regarding its design, outcomes, and influence on the IRP.

5b) *Recommendation*: That made-in Manitoba approaches to public engagement be developed for future energy planning rather than relying on generic and largely inadequate

templates like the IAP2 and that better reflect the often-unique challenges but also opportunities when it comes to energy planning in this province.

6a) *Finding*: Our evidence shows that through all of its avenues of public engagement, the Manitoba Hydro relied almost entirely on information provision and to a lesser degree targeted feedback on its ideas, this especially the case with the Technical Advisory Group. Rarely if ever did we see any opportunity much less a demonstrated example where such outreach influenced the modelling or the IRP as a whole. This was even the case for the TAC, which met eight times over a two-year period.

6b) *Recommendation*: That Manitoba Hydro explore ways of shifting its engagement activities along the participation gradient to include collaboration if not empowerment. This would especially be the case for its Technical Advisory Committee and the recently announced Indigenous Advisory Circle whose mandates as advice-only appear to be restricted by Manitoba Hydro.

7a) *Finding*: Our evidence shows that the modelling was entirely technocentric and thus excluded qualitative indicators that might provide useful inputs as well as outputs and feedback as it related to medium term energy planning. Qualitative inputs were dismissed, effectively excluding a wide diversity of insights especially those arising from Indigenous communities and their experiences and knowledge systems.

7b) *Recommendation*: That factors important to northern First Nations become incorporated into the evaluation metrics and signposts in a transparent and collaborative process, these including but not restricted to community infrastructure, housing, culture, traditional livelihoods, health, wellbeing, and equity.

8a) *Finding*: Our evidence shows the BC IRP was much more successful in engaging with First Nations throughout BC, a major shortcoming of the 2025 IRP that is the focus of this report. Indigenous engagement represented a separate stream of participation within the IRP whereas Indigenous people were treated as stakeholders in the IRP. As a result and accepting that the BC IRP was not perfect in this regard, First Nations and Indigenous organizations has sustained opportunities to help shape the outcome of the planning as opposed to being effectively excluded in the 2025 IRP.

8b) *Recommendation*: That Manitoba Hydro adopt some of the key elements regarding Indigenous engagement as reflected in the BC IRP. These would include the creation of a separate stream of Indigenous engagement, as well as opportunities and support for meetings, workshops, training, and knowledge exchange that are aimed at the leadership and grassroots of individual First Nations as well as Tribal Councils in Manitoba.

9a) *Finding*: The results of our interviews, our own survey of northern Indigenous communities and indeed some of the information provided by Manitoba Hydro all show that there was very little meaningful Indigenous engagement at any stage along the IRP and that this represents longstanding and entrenched patterns of engagement by Manitoba Hydro, which were key to documenting before suggesting any alternative practices.

9b) *Recommendation*: That the process of outreach and engagement with northern communities begin at least 2-3 years before the next iteration of the IRP is submitted, which would enable the relationships that are identified in this report as being so crucial to emerge. Indeed, before commencing on this plan, meetings should take place among communities, Indigenous organizations and senior management at Manitoba Hydro to explore what is desired and what is feasible for all those involved.

10a) *Finding*: Despite its potentially central importance in shaping public engagement in the IRP, our evidence shows that there was very little sustained Indigenous engagement in the TAC, which declined to include just one Indigenous Partner (the Manitoba Métis Federation) by the fourth of its eight meetings. This reflects the “listened-to-but-not-heard” nature of those meetings as reflected in the summary notes and one of our interviews.

10b) *Recommendation*: That the barriers to effective Indigenous engagement in the TAC be documented in detail and ways of addressing any such barriers be addressed to facilitate a wider diversity of Indigenous voices as well as the inclusion of a braided approach that incorporated both Western and Indigenous Science on the TAC. And that both the TAC and IAC be evaluated for impact and process in a way that is inclusive so that any such barriers can be proactively addressed.

11a) *Finding*: Our spatial analysis of the two rounds of Manitoba Hydro survey results shows that First Nations people and especially northern First Nations and Métis people were almost entirely excluded from any ability to participate. Indeed, of the >11,000 survey respondents, only four (three First Nations, one Métis) responded from the northernmost FSA code (R0B) which accounts for 67% of Manitoba’s land area and which is >90% Indigenous.

11b) *Recommendation*: That the underrepresentation of Indigenous voices in the two rounds surveys undertaken by Manitoba Hydro in part be addressed through a collaborative redesign of these tools and distribution through other platforms, including the use of social media like Facebook, Twitter/X, and Instagram and perhaps conducting a subset as in-person household surveys.

12a) *Finding*: Results from our interviews with members of hydro impacted communities and from our own survey show that Manitoba Hydro does a remarkably poor job of engaging with northern Indigenous communities, with the possible exception of First Nations that are limited Partners surrounding Wuskwatim and Keeyask. These interactions tend to again focus information distribution and on Chief and Council, effectively excluding the grassroots and land users who are usually the most adversely affected by hydro related impacts. Unfortunately, Manitoba Hydro continues to use these approaches in the IRP, if they engage with these communities at all

12b) *Recommendation*: That Manitoba Hydro’s engagement with northern First Nations seems to be characterized by working only with leadership, if this even occurs, or with hand-picked community members rather than working with the larger community. Existing engagement practices would benefit from being independently reviewed to see how and why they continue to underachieve, what might be done to address such shortcomings,

and also what success stories do exist, all of which could in turn help inform future iterations of the IRP.

13a) *Finding*: Our evidence shows that members of hydro-impacted Nations that we interviewed had much feedback on and advice for Manitoba Hydro as to how best to proceed with Indigenous engagement during the next iteration of the IRP. Most importantly, they were still willing to sit with Manitoba Hydro, notwithstanding a long history of harm and peripheralization. Their rich place-based cultural and technical insights are key to addressing risk and uncertainty as well as future energy planning. Yet the process of relationship-building and truth-based and mutually respectful interactions can play key roles in mitigating past and ongoing harms.

13b) *Recommendation*: That Manitoba Hydro incorporate approaches to Indigenous engagement that are people-centered and that they become willing to learn and to accept responsibility for past and ongoing harms as the utility company reframes its Indigenous engagement to be relationship- and community-based as the utility works to incorporate some of the rich insights provided by previously excluded landusers in its management activities and energy planning.

14a) *Finding*: The evidence arising from our interviews and survey show that the recognition of Indigenous rights and the importance of local control over decisions made on their traditional territories is of key importance to northern sovereign First Nations, including Integrated Resource Planning. An approach that has previously been excluded by Manitoba Hydro

14b) *Recommendation*: That Manitoba Hydro recognize the importance of Indigenous rights and sovereignty in its planning and management activities, rather than treating Indigenous communities as yet another stakeholder, and in so doing explore ways of equitably collaborating and partnering with communities in future iterations of the IRP as reflected in both the BC IRP and Yukon Regional Energy Planning.

15a) *Finding*: The evidence arising from our interviews and survey indicate an interest in Indigenous majority owned wind power in the South but especially the potential for community-led energy alternatives that were explicitly excluded from the 2025 IRP.

15b) *Recommendation*: That Manitoba Hydro and Manitoba address the hydro-related loss of livelihoods and the economic base of hydro-impacted communities, notably as related to commercial fishing but also trapping and hunting, by exploring ways that subsidy programs could be used to enable such Nations to invest not only in mega wind power but also in other smaller scale energy infrastructure.

16a) *Finding*: The evidence arising from our interviews and survey show that there is tremendous interest in community led and controlled energy alternatives including solar, geothermal and micro dams that are at once relatively affordable and impactful. Unfortunately it appears that Manitoba Hydro continues to undermine such opportunities both by unfair criticisms of the technology and by continuing to exclude northern Indigenous concerns and priorities in this regard.

16b) *Recommendation*: That Manitoba Hydro build on the strengths of its proposed Indigenous majority-owned wind power to explore how to better support community-led energy alternatives that are not only now technologically viable but that would make a huge difference in quality of life in northern Indigenous communities in ways that would recognize and address ongoing harms that reflect the power of reconciliation as presented by the Truth and Reconciliation Commission.

17a) *Finding*: The quantitative and predictive modelling that gave rise to the 2025 IRP is techno-exclusive in that it effectively excludes other worldviews and experiences, especially those related to northern First Nations. There are tremendous place-based insights related to ongoing climate related changes to the environment and future hydro production as well as those related to economics and political risk and uncertainty. Moreover, there were other identified risks related to health, cultural wellbeing and future generations that excluded from the IRP or any related decision-making.

17b) *Recommendation*: That Manitoba Hydro build on the strengths of its quantitative modelling and its use of Evaluation Metrics in the 2025 IRP by expanding them to include place-based climate, economics, and political risks and uncertainties identified by northern communities and their Indigenous Science, which will only strengthen the predictive capabilities of these models.

18a) *Finding*: The evidence arising from our interviews and survey show a mixed response to the potential of demand-side energy efficiency for northern First Nations. On one hand there is understandable criticism of the housing injustice that confronts most First Nations and inequitable housing conditions that would hamper much of the energy efficiency planning that has been designed to focus on urban centers. On the other hand, there was interest in accessing these options but which remain inaccessible because no outreach has occurred or because they remain too expensive, especially when it comes to housing that is owned and maintained by the Band.

18b) *Recommendation*: That Efficiency Manitoba conduct a public review of its existing Indigenous-centered programming and identify any successes and gaps. In so doing, it would co-design energy efficiency initiatives with Indigenous Nations that at once recognize and adapt to the substandard condition of existing housing, that build local capacity and employment opportunities in this sector, and that such options be made accessible to any interested Nations and community members.

13.0 References

- Abram, S., Atkins, E., Dietzel, A., Jenkins, K., Kiamba, L., Kirshner, J., Kreienkamp, J., Parkhill, K., Pegram, T., & Santos Ayllón, L. M. (2022). Just Transition: A whole-systems approach to decarbonisation. *Climate Policy*, 22(8), 1033–1049. <https://doi.org/10.1080/14693062.2022.2108365>
- Adkins, S., Jamieson, L., Oleniuk, T. L., & Spencer, S. (2020). UNDRIP as a framework for reconciliation in Canada: challenges and opportunities for major energy and natural resources projects. *Alberta Law Review*, 339-339.
- Arnstein, S. R. (1969). A ladder of citizen participation. *Journal of the American Institute of Planners*, 35(4), 216-224.
- Baasch, S. (2023). Towards an integrative understanding of multiple energy justices. *Geographica Helvetica*, 78(4), 547–558. <https://doi.org/10.5194/gh-78-547-2023>
- Bartlett, C., et al. (2012). Two-eyed seeing and other lessons learned within a co-learning journey of bringing together indigenous and mainstream knowledges and ways of knowing. *Journal of Environmental Studies and Science*, 2(4), 331-340.
- Baxter, D. (2025, August 29). *York Factory First Nation seeks court order to force Manitoba Hydro to raise water levels*. CBC News. <https://www.cbc.ca/news/canada/manitoba/hydro-york-factory-first-nation-water-level-lawsuit-1.7623772>
- BC First Nations Energy and Mining Council. (2021). Report to BC Hydro on the draft integrated resource plan: Appendix D, BCFNEMC 2021 IRP Indigenous workshops final report. BC Hydro Clean Power 2040. <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/appendix-d-BCFNEMC-2021-IRP-indigenous-workshops-final-report.pdf>
- BC Hydro. (2021a). Integrated resource plan: What we heard, Fall 2020: Indigenous Nations consultation summary report. Clean Power 2040. <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/irp-IR-consultation-summary-report-fall-2020.pdf>
- BC Hydro. (2021b). Appendix C: Regional workshop summaries: Appendix to Integrated resource plan: What we heard, Fall 2020. Clean Power 2040. <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/Appendix-C-Regional-Workshop-Summaries.pdf>
- BC Hydro. (2021c). Integrated resource plan: Gathering Indigenous feedback on our draft IRP, Summer 2021. Clean Power 2040. [https://www.bchydro.com/content/dam/BCHydro/customer-](https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/Appendix-D-Indigenous-Feedback-on-Draft-IRP-Summer-2021.pdf)

- portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/Integrated-resource-plan-phase-2-indigenous-consultation-report.pdf
- BC Hydro. (2025a). 2025 Integrated Resource Plan: Gathering First Nations feedback for our 2025 IRP, Phase 2.
<https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/IRP2025-Phase2-First-Nations-Report.pdf>
- BC Hydro. (2025b). 2024 Call for Power energy purchase agreements application. British Columbia Utilities Commission.
https://docs.bcuc.com/documents/proceedings/2025/doc_80253_b-1-bch-call-for-power-epas-application-public.pdf
- BC Hydro. (2025d). 2025 Call for Power engagement summary report.
<https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/independent-power-producers-calls-for-power/call-for-power/2025-cfp-engagement-summary-report.pdf>
- Binnie, W. I. C. (1990). The Sparrow Doctrine: Beginning of the end or end of the beginning. *Queen's LJ*, 15, 217.
- Blue, G., Bronson, K., & Lajoie-O'Malley, A. (2021). Beyond distribution and participation: A scoping review to advance a comprehensive environmental justice framework for impact assessment. *Environmental Impact Assessment Review*, 90, 106607.
- Bodaly, R. A., Johnson, T. W., Fudge, R. J. P., & Clayton, J. W. (1984). Collapse of the lake whitefish (*Coregonus clupeaformis*) fishery in Southern Indian Lake, Manitoba, following lake impoundment and river diversion. *Canadian Journal of Fisheries and Aquatic Sciences*, 41(3), 692–700. <https://doi.org/10.1139/F84-080>.
- Boyd, B., & Loreface, S. (2018). Understanding consultation and engagement of Indigenous Peoples in resource development: A policy framing approach. *Canadian Public Administration*, 61(4), 572-595.
- Breyer, C., Khalili, S., Bogdanov, D., Ram, M., Oyewo, A. S., Aghahosseini, A., Gulagi, A., Solomon, A. A., Keiner, D., Lopez, G., et al. (2022). On the history and future of 100% renewable energy systems research. *IEEE Access*, 10, 78176–78218.
<https://doi.org/10.1109/ACCESS.2022.3193402>
- British Columbia Utilities Commission. (2022, January 21). Order G-15-22: Procedural order, BC Hydro 2021 IRP.
<https://www.ordersdecisions.bcuc.com/bcuc/orders/en/item/519879/index.do>
- British Columbia Utilities Commission. (2024a, March 6). Decision and Order G-58-24: BC Hydro 2021 Integrated Resource Plan.
<https://www.ordersdecisions.bcuc.com/bcuc/decisions/en/item/522156/index.do>

- British Columbia Utilities Commission. (2024b, May 23). Order F-27-24: Participant Assistance/Cost Award, BC Hydro 2021 IRP.
<https://www.ordersdecisions.bcuc.com/bcuc/orders/en/item/522288/index.do>
- British Columbia Utilities Commission. (2025a, November 17). Order G-268-25: Regulatory timetable, BC Hydro 2025 IRP.
<https://norma.lexum.com/bcuc/orders/en/522962/1/document.do>
- British Columbia Utilities Commission. (2025b, December 12). Order G-299-25: Interveners, timetable, and scope, BC Hydro 2025 IRP.
<https://www.ordersdecisions.bcuc.com/bcuc/orders/en/523006/1/document.do>
- Colbourne, R., Peredo, A. M., & Henriques, I. (2023). Indigenous entrepreneurship? Setting the record straight. *Business History*, 66(3), 455–477.
<https://doi.org/10.1080/00076791.2023.2166034>
- Cutts, S., Fricano, R. J., & Peters, R. W. (2023). Environmental justice for whom? Citizen participation and brownfield redevelopment in downtown Birmingham, Alabama. *Environment and Planning E: Nature and Space*, 7(2), 583–608.
<https://doi.org/10.1177/25148486231199330>
- David Suzuki Foundation n.d. <https://davidsuzuki.org/what-you-can-do/what-is-land-back/>
- Dacks, G. (2002). British Columbia after the Delgamuukw Decision: land claims and other processes. *Canadian Public Policy/Analyse de Politiques*, 239–255.
- Dubrule, T., Patriquin, D., & Hood, G. (2018). A question of inclusion: BC Hydro's Site C Dam Indigenous consultation process. *Journal of Environmental Assessment Policy and Management*, 20(1). <https://doi.org/10.1142/S1464333218500059>
- Davis, A., & Andrew, J. (2018, June). *From rationalism to critical pragmatism: revisiting Arnstein's ladder of public participation in co-creation and consultation*. 8th State of Australian Cities National Conference, 28–30 November 2017, Adelaide, Australia.
- Embke, H. S., Croll, R., Panci, H., Shultz, A., Smith, S., Boygo, N., DeFoe, M., Gauthier, J., Michaud, G., Price, M. W., Reiter, D., Schlender, J., & Zomer, F. (2025). Sustaining Namāēw (Lake Sturgeon): Partner-led climate adaptation for Indigenous fisheries in the Laurentian Great Lakes. *Fisheries*. <https://doi.org/10.1093/fshmag/vuaf068>
- Gaboury, M. N., & Patalas, J. W. (1984). Influence of water level drawdown on the fish populations of Cross Lake, Manitoba. *Canadian Journal of Fisheries and Aquatic Sciences*, 41(3), 118–125. <https://doi.org/10.1139/F84-011>
- Government of British Columbia. (2026, May 13). Strong response to 2025 call for power, delivering clean, affordable energy.
<https://news.gov.bc.ca/releases/2026ECS0014-000552>

- Government of Manitoba. (n.d.). *Churchill River Diversion*. Environment and Climate Change. Retrieved June 17, 2026, from <https://www.gov.mb.ca/sd/water/water-power/churchill/index.html>
- Henkeman, S. (2021). Reconciliation as an outcome rather than an intention. In *Trading justice for peace? Reframing reconciliation in TRC processes in South Africa, Canada and Nordic countries* (pp. 77–90). AOSIS. <https://doi.org/10.4102/aosis.2021.bk174.04>
- Hirst, E. (1992). *A good integrated resource plan: Guidelines for electric utilities and regulators* (ORNL/CON-354). Oak Ridge National Laboratory. <https://doi.org/10.2172/10129845>
- Hirst, E., & Goldman, C. (1991). Creating the future: Integrated resource planning for electric utilities. *Annual Review of Energy and the Environment*, 16(1), 91–121. <https://doi.org/10.1146/annurev.eg.16.110191.000515>
- Hirst, E., & Schweitzer, M. (1990). Electric-utility resource planning and decision-making: The importance of uncertainty. *Risk Analysis*, 10(1), 137–146. <https://doi.org/10.1111/j.1539-6924.1990.tb01028.x>
- International Association for Public Participation. (2018). *IAP2 spectrum of public participation*. https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/spectrum_8.5x11_print.pdf
- Kemp, C. (2026, June 2). Proposed wind farm development draws concern from St. Leon area residents. *CBC News*. <https://www.cbc.ca/news/canada/manitoba/st-leon-wind-farm-expansion-proposal-9.7219363>
- Kives, B. (2026, June 10). Manitoba sought U.S. help to develop large AI data centre and find private financial partner on \$18B hydro dam. *CBC News*. <https://www.cbc.ca/news/canada/manitoba/data-centre-dam-ndp-9.7228678>.
- Koutouki, K., Loftis, K., & Davidian, G. (2018). A rights-based approach to indigenous women and gender inequities in resource development in northern Canada. *Review of European, Comparative and International Environmental Law*, 27(3), 262–272. <https://doi.org/10.1111/REEL.12240>
- Krupa, J. (2013). Realizing truly sustainable development: A proposal to expand Aboriginal “price adders” beyond Ontario electricity generation projects. *Utilities Policy*, 26, 85–87. <https://doi.org/10.1016/j.jup.2012.07.008>
- Kung, A., Holcombe, S., Hamago, J., & Kemp, D. (2022). Indigenous co-ownership of mining projects: a preliminary framework for the critical examination of equity participation. *Journal of Energy & Natural Resources Law*, 40(4), 413–435. <https://doi.org/10.1080/02646811.2022.2029184>

- Lajoie-O'Malley, A., Bronson, K., & Blue, G. (2023). 'Consent' as epistemic recognition: Indigenous knowledges, Canadian impact assessment, and the colonial liberal democratic order. *Social Studies of Science*, 53(4), 545-571.
- Lim, A. B., Poelzer, G., & Noble, B. (2024). Social value of renewable energy in remote northern Indigenous communities. *Journal of Aboriginal Economic Development*, 14, 74–91. <https://doi.org/10.29173/jaed8>
- Manitoba Hydro. (2025). 2025 IRP: Round 2 engagement presentation. <https://www.hydro.mb.ca/docs/corporate/irp/2025-irp-round-2-presentation.pdf>
- Manitoba Hydro. (2026). The energy transition; building for the future. <https://www.hydro.mb.ca/articles/2026/01/the-energy-transition-building-for-the-future/#:~:text=Around%2097%25%20of%20the%20electricity,fossil%20fuels%20and%20some%20biofuels.>
- Manitoba Hydro. (2026a). 2025 IRP engagement report. <https://www.hydro.mb.ca/docs/corporate/irp/2025-irp-engagement-report.pdf>
- Manitoba Hydro. (2026b). 2025 Integrated resource planning. <https://www.hydro.mb.ca/corporate/planning/>
- Manitoba B Hydro (2026d) Appendix A: Engagement report supplement supporting material. Manitoba Hydro IRP and MNF. https://www.hydro.mb.ca/docs/regulatory_affairs/pdf/other_regulatory_matters/irp_mnf_review/01-45_appendix_a_supplement.pdf
- Manitoba Public Utilities Board. (2026, March 12). Order No. 39/26: Second procedural order re pre-hearing conference and intervener applications. <https://www.pubmanitoba.ca/v1/proceedings-decisions/orders/pubs/26-orders/39-26.pdf>
- MB FNEMC. (2026). Questionnaire feedback on BC Hydro's 2021 and 2025 integrated resource plan processes from a First Nations standpoint [Unpublished raw data]. Wa Ni Ska Tan: An Alliance of Hydro-Impacted Communities.
- McDowell, C. (2026, June 13). Weighing profits against transforming 'beautiful country' of wind-turbine proposal south of Brandon. *Winnipeg Free Press*. <https://www.winnipegfreepress.com/local/2026/06/13/weighing-profits-against-transforming-beautiful-country-of-wind-turbine-proposal-south-of-brandon>
- McLachlan, S. M. (2014a). *Deaf in One Ear and Blind in the Other: Science, Aboriginal Traditional Knowledge, and the Implications of Keeyask for the Socio-Environment. A Report for the Manitoba Clean Environment Commission on Behalf of the Concerned Fox Lake Grassroots Citizens*. Winnipeg, MB: Environmental Conservation Lab, University of Manitoba.
- McLachlan, S. (2018, May 4). *Death by a thousand dams: A cross-cultural critique of the socio-environmental dimensions of the Manitoba Minnesota Transmission Project*. Wa Ni Ska Tan Alliance of Hydro-Impacted Communities.

- Middleton Manning, B. R. (2023). Water, power, homeland: Restoring and re-storying the Eklutna River. *Frontiers in Human Dynamics*, 5, Article 1220040. <https://doi.org/10.3389/fhumd.2023.1220040>
- Monaco, C. (2023). [Review of *In our backyard: Keeyask and the legacy of hydroelectric development*, by A. Craft & J. Blakley]. *The Canadian Geographer / Le Géographe canadien*, 67(2), 355–357. <https://doi.org/10.1111/cag.12839>
- Newbury, R. W., McCullough, G. K., & Hecky, R. E. (1984). The Southern Indian Lake impoundment and Churchill River Diversion. *Canadian Journal of Fisheries and Aquatic Sciences*, 41(4), 548–557. <https://doi.org/10.1139/f84-068>
- Nur, A. I., Al-Fatih, S., & Intania, C. C. (2024). Revitalising Indigenous rights participation in mining lawmaking process. *Law Reform*, 20(1), 188–210. <https://doi.org/10.14710/lr.v20i1.63684>
- Papillon, M., & Rodon, T. (2017). Proponent–Indigenous agreements and the implementation of the right to free, prior, and informed consent in Canada. *Environmental Impact Assessment Review*, 62, 216–224. <https://doi.org/10.1016/j.eiar.2016.06.009>
- Porter, L., Matunga, H. P., Viswanathan, L., Patrick, L., Walker, R., Sandercock, L., Moraes, D., Frantz, J. A., Thompson-Fawcett, M., Riddle, C., & Jojola, T. (2017). Indigenous planning: From principles to practice. *Planning Theory & Practice*, 18(5), 733–775. <https://doi.org/10.1080/14649357.2017.1380961>
- Rodon, T., & Papillon, M. (2020). The transformative potential of Indigenous-driven approaches to implementing free, prior and informed consent: Lessons from two Canadian cases. *International Journal on Minority and Group Rights*, 27(2), 314–335. <https://doi.org/10.1163/15718115-02702009>
- Ryan-York, C. (2025). "As Long as the Grass Grows, and the Sun Walks": Finding Discomfort in Land Acknowledgements. *Spectrum*, (14).
- Saito, H. (2021). The developmental state and public participation: The case of energy policy-making in post-Fukushima Japan. *Science, technology, & human values*, 46(1), 139–165.
- Sareen, S. (2021). Digitalisation and social inclusion in multi-scalar smart energy transitions. *Energy Research & Social Science*, 81, Article 102251.
- Schweitzer, M., Hirst, E., & Yourstone, N. E. (1990). *The process of integrated resource planning for electric utilities*. Oak Ridge National Laboratory, Energy Division.
- Scott, D. N. (2025). Infrastructural (Dis)Entitlement: Tactics of Dispossession on the Critical Minerals Frontier. *Journal of Law and Political Economy*, 5. <https://doi.org/10.5070/lp65164812>
- Stacey, R. (2018). Honour in sovereignty: Can Crown consultation with Indigenous peoples erase Canada's sovereignty deficit? *University of Toronto Law Journal*, 68(3), 315–359. <https://doi.org/10.3138/UTLJ.2017-0110>

- Tritter, J. Q., & McCallum, A. (2006). The snakes and ladders of user involvement: moving beyond Arnstein. *Health policy*, 76(2), 156-168.
- (TRC) Truth, & Reconciliation Commission of Canada. (2015). Canada's Residential Schools: The Final Report of the Truth and Reconciliation Commission of Canada (Vol. 1). McGill-Queen's Press-MQUP.
- Wa Ni Ska Tan (2025). https://hydroimpacted.ca/wp-content/uploads/2025/11/2025-11-20-Open-Letter_TCN-Sovty-and-Bill-C518.pdf
- Wark, J. (2021). Land acknowledgements in the academy: Refusing the settler myth. *Curriculum Inquiry*, 51(2), 191–209.
<https://doi.org/10.1080/03626784.2021.1889924>.
- Wiebe, et al. 2024. <https://theconversation.com/meaningful-engagement-is-the-key-to-achieving-bill-c-226s-goal-of-ending-environmental-racism-in-canada-227855>