



April 30, 2019

**BY COURIER & RESS**

Ms. Kirsten Walli, Board Secretary  
ONTARIO ENERGY BOARD  
2300 Yonge Street, 26<sup>th</sup> Floor, P.O. Box 2319  
TORONTO, ON M4P 1E4

Re: Board File No. EB-2019-0049 - 2020 Cost of Service Application  
Kitchener-Wilmot Hydro Inc. - Licence No. ED-2002-0573

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Dear Ms. Walli:

As part of the filing of its 2020 Cost of Service Rate Application, Kitchener-Wilmot Hydro Inc. (KWHI) is filing redacted versions of the following documents on public record:

*Category One*

Exhibit 2, Appendix 2-3 (Distribution System Plan) Appendix 2-3	CIS Replacement Business Case dated April 2019
Exhibit 4, Appendix 4-7	Bill and Mail Processing Outsourcing Proposal dated March 19, 2017

*Category Two*

Exhibit 4, Appendix 4-5	PILs Tax Returns for 2017
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KWHI is filing the above documents in confidence pursuant to the Ontario Energy Board's (the Board) Practice Direction on Confidential Filings (the Practice Direction).

For the Category One information, the third parties whose information has been redacted are engaged in competitive business activities. The information that has been redacted is consistently treated in a confidential manner. Disclosure of the third-party information in the document could reasonably be expected to prejudice the economic interest of, significantly prejudice the competitive position of, cause undue financial loss to, and be injurious to the financial interest of the applicable third party.



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The document listed in Category Two includes personal information, such as names of individuals, employees' names, apprentices' names, photographs, salaries and/or employment related information. KWHI does not have these individuals' consent to the public release of this information.

The Practice Direction recognizes that these are both among the factors that the Board will take into consideration when addressing the confidentiality of filings. They are also addressed in subsection 17(1) of the *Freedom of Information and Protection of Privacy Act* ("FIPPA"), and the Practice Direction notes (at Appendix C of the Practice Direction) that third party information as described in subsection 17(1) of FIPPA is among the types of information previously assessed or maintained by the Board as confidential.

KWHI will provide unredacted copies of the documents listed in Categories One and Two to parties' counsel and experts or consultants provided that they have executed the Board's form of Declaration and Undertaking with respect to confidentiality and that they comply with the Practice Direction, subject to KWHI's right to object to the Board's acceptance of a Declaration and Undertaking from any person.

In keeping with the requirements of the Practice Direction, KWHI is filing two confidential unredacted versions of the documents listed in Categories One and Two in hard copy only. The unredacted versions of the documents have been placed in a sealed envelope marked "Confidential". These documents are marked "Confidential" and KWHI has identified the portions of the documents in respect of which confidentiality is claimed through the use of yellow highlighting and printed on blue paper.

Questions or concerns in this matter should be addressed to the undersigned.

Respectfully submitted,

Margaret Nanninga, MBA, CPA, CGA  
Vice President Finance & CFO