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February 22, 2013

Kirsten Walli, Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms Walli:

IN THE MATTER OF the *Electricity Act*, 1998, S.O. 1998, c. 15, Schedule A;

AND IN THE MATTER OF an Application made collectively by entities that have renewable energy supply procurement contracts with the Ontario Power Authority in respect of wind generation facilities for an Order revoking amendments to the market rules and referring the amendments back to the Independent Electricity System Operator for further consideration.

Board File No: EB-2013-0029

Ontario Electricity Financial Corporation Submissions on Confidentiality regarding the document entitled "Protocol between OEFC and IESO on NUG Curtailment for SBG" (the "Document")

I am writing on behalf of Ontario Electricity Financial Corporation ("OEFC") in connection with the above-noted matter. Pursuant to Procedural Order No.3, at page 9, the Board has requested that Independent Electricity System Operator (IESO) filings comply with the *Practice Direction on Confidential Filings* ("Confidentiality Practice Direction").

In accordance with Appendix A of the Confidentiality Practice Direction, OEFC is asserting confidentiality over sections of the Document. OEFC will rely upon the IESO for the submission to the Board of the redacted and un-redacted versions of the Document itself.

This confidentiality assertion is on the basis of Sections (a) i. "prejudice to any person's competitive position" and iii. "whether the information could interfere significantly with negotiations being carried out by a party" as described in Appendix A of the Confidentiality Practice Direction.

Text on Page 1 is proposed to be redacted since its release would prejudice OEFC's competitive position in negotiating and minimizing the cost of curtailments with Non-Utility Generators (NUGs). Section 2.2 on pages 4-6 of the Document is redacted due to concerns about disclosing the OEFC timing and notice parameters for reasons of commercial confidentiality and to avoid impacting ongoing curtailment negotiations with NUGs. Release would prejudice OEFC's competitive position in negotiating and minimizing the cost of curtailments with NUGs. Minimizing the cost is to the benefit of ratepayers, as OEFC NUG costs are recovered through the Global Adjustment.

If the Board has any questions in this regard, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kenneth S. Russell".

Kenneth Russell
Counsel

c: Ronald Kwan
Sandy Roberts