



Northern Ontario Wires Inc.  
153 Sixth Avenue  
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Cochrane, ON  
P0L 1C0

May 1, 2013

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

**Re: Cost of Service Application EB-2012-0153  
SEC objection to NOW Confidential Filing**

Dear Ms. Walli:

Pursuant to Procedural Order No. 3, this is Northern Ontario Wires Inc.'s reply submissions to SEC's objection, dated April 30, 2013, with respect to Northern Ontario Wires Inc.'s ("NOW") request for confidentiality treatment for its Strategic Financial Plan, dated October 26, 2009, requested in Interrogatory 5-SEC-12s.

NOW reiterates that the Strategic Financial Plan contains information that is sensitive in nature and proprietary to the third-party who prepared them. NOW requested the third party to prepare the document under the understanding that it would be for used for internal purposes only. NOW did not intend to use it for disclosure to the general public. NOW believes that the recommendations made in this document may be misinterpreted if read by an uninformed reader.

In NOW's view the Strategic Financial Plan is similar in nature to a Business Plan; to that end NOW respectfully submits that the Board's findings with respect to THESL's request for confidential filing of its Business Planning documentation in EB-2010-0142 (page 5) apply equally to concerns related to NOW's Strategic Financial Plan:



*With respect to the Business Plan, the Board finds that it will remain confidential. While the Board is interested in having as much information as possible on the public record, the Board relies on full and complete disclosure of all relevant information in order to ensure that its decisions are well-informed. The Board recognizes that some of that information, such as business plans, are of a confidential nature and should be protected as such. The Board also agrees with Toronto Hydro that the Board has previously held business plans to be confidential. As such, Toronto Hydro had a reasonable expectation that this document would be maintained as confidential.*

*Depending on whether and to what extent elements of the Business Plan become critical to this proceeding, the Board may deem it necessary to seek further submissions regarding whether any elements of the Business Plan may appropriately go on the public record, but at this stage the document shall remain confidential in its entirety.*

NOW respectfully submits that the Board should follow a similar course of action in this proceeding, allowing the document to remain confidential in its entirety, with the ability to seek further submissions in the event one or more parties asserts some particular aspect of the document should appropriately go on the public record.

If the Board decides that the document should not be afforded confidential treatment, then in accordance with section 5.1.12 of the Board's Practice Direction on Confidential Filings, NOW hereby respectfully requests that the information be withdrawn from the record.

Yours Truly,

**NORTHERN ONTARIO WIRES INC.**

Geoffrey Sutton, CPA CA  
Chief Financial Officer