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February 24, 2014

BY RESS (non-confidential information only) and OVERNIGHT COURIER

Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor - 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2013-0321 - Application by Ontario Power Generation Inc.
For 2014-2015 Payment Amounts (the "Application")**

In accordance with Rule 10 of the Ontario Energy Board's ("**OEB**") *Rules of Practice and Procedure*, section 5.1 of the OEB's *Practice Direction on Confidential Filings* (the "**Practice Direction**") and Procedural Order #3 (issued on February 19, 2014), Ontario Power Generation Inc. ("**OPG**") requests confidential treatment for certain portions of the updated business case summary for OPG's Darlington Refurbishment Project (the "**Updated Darlington Refurbishment BCS**") located at Exhibit D2-2-1, Attachment 5, and the Fuel Channel Life Extension Business Case Summary (the "**FCLE BCS**"), located at Exhibit F2-3-3, Attachment 1, Tab 11, as filed by OPG on February 6, 2014.

OPG has set out below the reasons for the confidentiality request, and the reasons why public disclosure would be detrimental to OPG.

In accordance with the Practice Direction, this letter is being provided to the OEB along with six (6) unredacted copies of each of the documents. Information previously redacted is indicated by red boxes as per the Practice Direction. The unredacted documents are intended for review by those intervenors who sign the OEB's confidentiality undertaking.

Procedural Order No. 1 provided parties an opportunity to make submissions on whether the information filed in OPG's pre-filed evidence should be designated as confidential by the OEB. Procedural Order No. 1 also provided that counsel and consultants for intervenors who wished to review the information for which OPG seeks confidential treatment may do so by signing the OEB's form of Declaration and Undertaking. As an interim measure, and in the interests of efficiency, prior to the OEB making its final determination on OPG's request for confidential treatment, OPG requests that the same process as outlined in OPG's letter dated October 2, 2013 relating to confidential treatment of certain of its pre-filed evidence, and as the OEB accepted in Procedural Order No. 1, be attributed to the two documents set out above.

Reasons for Confidential Treatment of the Updated Darlington Refurbishment BCS

With the exception of the redaction at the bottom of page 35, the redacted portions of the Updated Darlington Refurbishment BCS should be protected as confidential as this information includes commercially sensitive information such as contingencies, point estimates for total project costs, or aggregate information that would allow determination of commercially sensitive information. Disclosure of the redacted portions of the Updated Darlington Refurbishment BCS that include OPG commercially sensitive information would prejudice OPG's competitive position because if OPG's budgets for contingencies, even on a preliminary basis, are made publicly available they may affect suppliers' bids for work and ultimately increase the cost for the work. Therefore, release of such information may significantly interfere with OPG's negotiations and existing relationships in a variety of aspects of its business. Furthermore, similar information was treated as confidential by the OEB in OPG's previous application, EB-2010-0008.¹

We were previously advised that the redaction at the bottom of page 35 related to third party commercially sensitive information received by OPG. We have since been advised that this figure is now publicly available. OPG will be filing a revised redacted version of the Updated Darlington Refurbishment BCS with this figure unredacted as follows (in bold, underline):

"An additional **\$1B** in replacement energy costs, operations and maintenance costs, and incremental financing for non-project related costs was incurred by New Brunswick Power."

Reasons for Confidential Treatment of the FCLE BCS

The redacted portions of the FCLE BCS should be protected as confidential as this information is commercially sensitive, namely, contingencies and aggregate information that would allow determination of the contingencies. Disclosure of the redacted portions of the FCLE BCS would prejudice OPG's competitive position and significantly interfere with its negotiations by giving potential or current suppliers a clear understanding of costing aspects of the project. This information would give such suppliers an unfair advantage, and prejudice OPG's ability to achieve value-for-money in future bids or contract negotiations as between such suppliers and OPG. Once again, similar information was treated as confidential by the OEB in EB-2010-0008 (see: Procedural Order No. 3).

Respectfully submitted,

[Original signed by]

Colin Anderson

cc: Carlton D. Mathias, OPG
Charles Keizer, Torys

¹ See EB-2010-0008, Procedural Order No. 3 dated July 21, 2010.