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February 24, 2014

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

Dear Ms. Walli:

Re: EB-2013-0174

We are writing in accordance with Procedural Order #3 in the above-referenced proceeding. The School Energy Coalition (the "SEC") has filed a motion to compel Veridian to disclose Volume 2 of the [REDACTED] ("Volume 2"). Veridian has been advised by [REDACTED], that Veridian is not permitted by contract to disclose Volume 2 and has asked Veridian to file this submission in reply to the SEC's submission that was filed this past Saturday.

By way of background, Veridian has already filed [REDACTED] ("Volume 1") on a confidential basis. Volume I is comprised of three elements. [REDACTED]

[REDACTED] Volume I is unique to Veridian.

The SEC became aware of Volume 2 because it was referenced in Volume 1. Volume 2, the [REDACTED]

[REDACTED]

Veridian submits that Volume 2 is not relevant to this proceeding. Everything about Veridian necessary [REDACTED] is in Volume 1, which the SEC already possesses. Veridian believes that the SEC is likely motivated to obtain Volume 2 so it can [REDACTED]

[REDACTED]

For this reason, Veridian submits that the SEC should be denied access to Volume #2, especially since it already has Volume #1, which is specific to Veridian.

Should the Board order Veridian to disclose Volume 2, we request that Veridian be permitted to disclose it confidentially. The grounds for this request are as follows:

1) [REDACTED]

[REDACTED]

[REDACTED]

2) Public disclosure of Volume 2 could potentially result in a significant financial loss to [REDACTED]

[REDACTED]

3) Veridian's confidentiality request is an attempt by Veridian to, in good faith, support the spirit of the confidentiality that governs Volume 2 while still allowing for the effective adjudication of Veridian's application.

4) Volume 2 contains data [REDACTED]

[REDACTED]

5) If Volume 2 is made public [REDACTED]

[REDACTED]

6) Volume 2 shows [REDACTED] confidential approach, methodology and organization of [REDACTED]. Not only is the data confidential, but the approach is proprietary and valuable to [REDACTED]. Making Volume 2 public would give others an unfair competitive advantage.

Should the Board order Veridian to disclose Volume 2 on the public record, we request that the order be delayed to allow the [REDACTED] to seek alternative remedies.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew Taylor".

Andrew Taylor