



London Hydro Inc.  
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July 7, 2014

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

**Re: Application for Accounting Order EB-2014-0196  
Confidential Filing**

Dear Ms. Walli:

London Hydro Inc. ("London Hydro") hereby files in confidence responses to interrogatories Staff 7a and LPMA 5a.

In accordance with Section 5.1 of the OEB Practice Direction On Confidential Filings (Revised April 24, 2014) London Hydro hereby requests the entire document requested by both interrogatories be treated in confidence. The requested Report on Retiree Life Options (the "Report") contains information that could be considered personal information, confidential information or commercially sensitive information.

As noted in Appendix E – Disclaimer of the Report, the report owner, Mercer, has proprietary interest in the information included in the Report.

The information included in this report is strictly confidential and is proprietary to Mercer. Any unauthorized use and/or distribution of this material are strictly prohibited unless explicitly agreed to in writing by Mercer

London Hydro also notes the following communication received from the Senior Associate responsible for the preparation of this Report:

If the Ontario Energy Board asks for a copy of the Report, we request that prior to releasing the Report you ask the OEB to commit to one of two things:

- (i) maintain the confidentiality of the Report and not make it available publicly; or
- (ii) all the Report to be redacted to remove all personal information, confidential information and commercially sensitive information.



As required the following is a summary of topics included in the Report:

#### CONTENTS

1. Introduction
  2. Voluntary Buy Out
  3. Paid-Up Life
  4. Self-Insure Amounts Up to \$10,000
  5. Combination of Options
  6. Prevalence of Changes to Retiree Plans
  7. Summary
- Appendix A: Retiree Cost Comparisons  
Appendix B: Mercer Valuation Assumptions  
Appendix C: Mercer Quick Poll.  
Appendix D: Side by Side Comparison  
Appendix E: Disclaimers

London Hydro engaged Mercer to review options and make recommendations for actions that may be taken, which are unique to London Hydro. Mercers Report includes proprietary expert opinion and includes confidential supporting documentation for London Hydro's management's specific consideration. London Hydro would suggest that while the Report is relied upon to provide a road map or guide for actions to be taken, it does not in and of itself, directly support the ultimate direction that London Hydro will follow. London Hydro has simply requested an accounting order for the potential to create three deferral accounts, in order to pursue an opportunity for saving money in the long run. Obviously the ultimate disposition of the deferral accounts will be the time to test and determine the success of actions taken.

London Hydro is concerned that the public disclosure of this document, even in redacted form, potentially exposes, unnecessarily, the business processes of Mercer to its competitors. London Hydro is of the opinion that, in this circumstance, the Report is not factual evidence to be used for reliance in determining ultimate disposition of the requested deferral accounts. London Hydro sole purpose in referencing this document is to give informational background to the quantum and timing of expenditure required. London Hydro believes that its original application and interrogatory responses provides sufficient details for supporting our request.

London Hydro does not believe that the public interest and the transparency of OEB process are in any way compromised by withholding the disclosure of this document from public purview. London Hydro therefore requests the Board to accept the entire document in confidence.

London Hydro will provide requested copy of the Report to all relevant party under the guidance of the 6.1 of the OEB Practice Direction On Confidential Filings (Revised April 24, 2014).

London Hydro is cognizant of the fact that it is up to the Board to determine confidentiality. London Hydro herein requests Board direction.

All the above is respectfully submitted.



Yours Truly,

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