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November 11, 2014

*via RESS – signed original to follow by courier*

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
PO Box 2319  
2300 Yonge Street, 27th floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Toronto Hydro-Electric System Limited (“Toronto Hydro”)  
Custom Incentive Rate-setting Application for 2015-2019 Electricity Distribution Rates  
and Charges – Confidential Interrogatory Responses – OEB File No. EB-2014-0116**

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We are writing further to our letter dated November 5, 2014.

In the above letter, Toronto Hydro sought an order from the OEB that certain information in Toronto Hydro’s interrogatory responses be kept confidential. One such interrogatory was in relation to the cost difference between internal and external construction of projects (response to 4A-CUPE-2 part (a)). In relation to this interrogatory, Toronto Hydro submitted that the financial data in the table attached to the interrogatory is commercially sensitive and its disclosure could interfere significantly in Toronto Hydro’s negotiations with construction contractors.

In addition to construction contractors, Toronto Hydro is concerned that disclosure to CUPE and its representatives could impact Toronto Hydro’s labour bargaining position. This could put upward pressure on Toronto Hydro’s costs and by extension reduce value for ratepayers. Accordingly, Toronto Hydro proposes that should the OEB grant Toronto Hydro’s request for confidentiality in relation to this interrogatory response, that the OEB order that the confidential information be disclosed, subject to any conditions the OEB may find appropriate, only to those persons that have signed the declaration and

undertaking, but excluding any CUPE representatives.

Please do not hesitate to contact me if you have any questions.

Yours truly,

*[original signed by]*

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