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January 28, 2015

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

Dear Ms. Walli

Re: **EB-2014-0116 Toronto Hydro Electrical System Limited**

Hydro Ottawa Limited is an electricity distributor serving the municipalities of Ottawa and Casselman, Ontario. Hydro Ottawa has learned that the School Energy Coalition ("SEC") has brought a motion in the above-referenced proceeding asking the Ontario Energy Board ("Board") for an order requiring Toronto Hydro Electrical System Limited ("Toronto Hydro") to provide a number of surveys/studies, the provision of which would disclose confidential benchmarking data provided to the Canadian Electricity Association ("CEA") by its members.

Hydro Ottawa is not a party in the above proceeding, nor is it seeking standing before the Board; however, Hydro Ottawa is compelled to write to the Board since a decision to order the production of the surveys/studies requested by SEC would result in the release of Hydro Ottawa's information. As part of its participation in the CEA benchmarking survey, Hydro Ottawa provides the CEA with sensitive information regarding its performance. Hydro Ottawa provides this information in order to assist in the identification of opportunities to improve business processes and efficiencies and potentially reduce costs in the provision of utility services and products for the benefit of its customers. Hydro Ottawa has always understood that the data will, at all times, be held in the strictest confidence. Indeed, Hydro Ottawa, as do all participating members, sign a binding confidentiality agreement with the CEA to this effect.

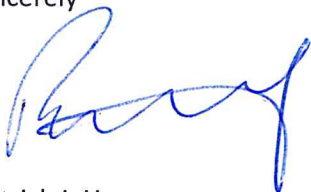
Should the Board make the order requested by SEC, Hydro Ottawa submits that in the future other utilities, especially utilities outside the province of Ontario, will be reluctant to allow Hydro Ottawa to participate in benchmarking studies knowing that there is a high probability that their confidential data will become public by means of the Board. This could effectively reduce Hydro Ottawa's comparison group to Ontario electricity distribution utilities which the comparison data is readily available through the OEB's scorecard. Hydro Ottawa submits that this potential limitation on comparison to other utilities will ultimately be to the detriment of its customers.

Additionally, if the Board were inclined to grant SEC's motion, Hydro Ottawa submits that SEC has not provided valid reasons and rationale for the production of all parts of the surveys/studies and the detailed data for utilities other than Toronto Hydro. In paragraph 6, SEC indicates "understanding how THESL performs against other utilities is an important way that parties can scrutinize the application and to determine if the proposed revenue requirement will lead to 'just and reasonable' rates." SEC's reasoning for the request is to evaluate Toronto Hydro and Toronto Hydro's performance.

Hydro Ottawa submits that based upon the reasons and rationale given by SEC for the production of the studies, SEC can understand how THESL performs against other utilities if Toronto Hydro provides a description of each metric that was compared to the other utilities, the industry average for each of those metrics, Toronto Hydro's relative position in comparison to the other utilities and any discussion and comment Toronto Hydro wishes to make. Hydro Ottawa respectfully submits that SEC's request can be fulfilled by extracting Toronto Hydro's data and results from the larger studies.

In conclusion, Hydro Ottawa strongly opposes the request of SEC for the production of the entire set of surveys/studies and the associated detailed data because (1) as a result of such a decision, in the future, Hydro Ottawa foresees itself being unwelcome/excluded by other electric utilities in Canada and the U.S. in participating in quality benchmarking studies with them, all to the detriment of Hydro Ottawa's customers and (2) SEC has not provided valid reasons and rationale for the production of any individual data from utilities other than Toronto Hydro.

Sincerely



Patrick J. Hoey

Director, Regulatory Affairs

Cc: Francis Bradley, Vice President, Policy Development, Canadian Electricity Association