ARRISTERS AND SOLICITORS

Jacynthe Ledoux jledoux@oktlaw.com 416.981.9352 74168

September 27, 2018

SENT VIA RESS AND COURRIER

Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Attention: Kristen Walli, Board Secretary

Dear Kristen Walli, Board Secretary:

Re: Bamkushwada Limited Partnership's Concerns re Hydro One Interrogatory Responses dated September 24, 2018

Upper Canada Transmission Inc and Hydro One Networks Inc - East-West Tie Line Project and Lake Superior Link Project Combined Hearing

Your File No. EB-2017-0182/EB-2017-0194/EB-2017-0364

We are counsel to the Bamkushwada Limited Partnership ("BLP"), an intervenor in the abovenoted proceeding. As per letter dated August 30, 2018, we adopted NextBridge's interrogatories to HONI dated August 28, 2018. On September 24, 2018, Hydro One filed its responses to those information requests.

We wish to make the Board aware that BLP shares NextBridge's and the Métis Nation of Ontario's concerns, expressed by correspondence to the Board dated September 26 and 27, 2018. A review of Hydro One's responses to NextBridge's information requests leaves us with substantially incomplete material, a lack of detailed information and limited data with respect to matters of central concern to BLP.

As per the Board's Procedural Order 7, we request that unredacted copies of all proposed confidential information be provided within the timeline specified by the Board. We support NextBridge's request that Hydro One provide complete answers to the requests set out in Table B to NextBridge's letter.

Further, please find attached a signed copy of the Declaration and Undertaking mentioned in the Board's Procedural Order 7, in order to be provided with the unredacted copies of Hydro One and Nextbridge's proposed confidential information.

Kindest regards,

Olthuis, Kleer, Townshend LLP

JACYNTHE LEDOUX

JL/

Ontario Energy Board

Form of Declaration and Undertaking

	EB-[]		
	IN THE MATTER OF []		
	DECLARATION AND UNDERTAKING		
l,	, am counsel of record or a consultant for		
	DECLARATION		
	I declare that:		
1.	I have read the <i>Rules of Practice and Procedure</i> of the Ontario Energy Board (the "Board") and all Orders of the Board that relate to this proceeding.		
2.	I am not a director or employee of a party to this proceeding for which I act or of any other person known by me to be a party in this proceeding.		
3.	I understand that this Declaration and Undertaking applies to all information that I receive in this proceeding and that has been designated by the Board as confidential and to all documents that contain or refer to that confidential information ("Confidential Information").		
4.	I understand that execution of this Declaration and Undertaking is a condition of an Order of the Board, that the Board may apply to the Superior Court of Justice to enforce it.		
	UNDERTAKING		
	I undertake that:		

- 1. I will use Confidential Information exclusively for duties performed in respect of this proceeding.
- 2. I will not divulge Confidential Information except to a person granted access to such Confidential Information or to the Board.
- 3. I will not reproduce, in any manner, Confidential Information without the prior written approval of the Board. For this purpose, reproducing Confidential Information includes scanning paper copies of Confidential Information, copying the Confidential Information onto a diskette or other machine-readable media and saving the Confidential Information onto a computer system.
- 4. I will protect Confidential Information from unauthorized access.
- 5. With respect to Confidential Information other than in electronic media, I will, promptly following the end of this proceeding or within 10 days after the end of my participation in this proceeding:
 - (a) return to the Board Secretary, under the direction of the Board Secretary, all documents and materials in all media containing Confidential Information, including notes, charts, memoranda, transcripts and submissions based on such Confidential Information; or
 - (b) destroy such documents and materials and file with the Board Secretary a certification of destruction in the form prescribed by the Board pertaining to the destroyed documents and materials.
- 6. With respect to Confidential Information in electronic media, I will:
 - (a) promptly following the end of this proceeding or within 10 days after the end of my participation in this proceeding, expunge all documents and materials containing Confidential Information, including notes, charts, memoranda, transcripts and submissions based on such Confidential Information, from all electronic apparatus and data storage media under my direction or control and file with the Board Secretary a certificate of destruction in the form prescribed by the Board pertaining to the expunged documents and materials; and
 - (b) continue to abide by the terms of this Declaration and Undertaking in relation to any such documents and materials to the extent that they subsist in any electronic apparatus and data storage media under my direction or control and cannot reasonably be expunged in a manner that ensures that they cannot be retrieved.
- 7. For the purposes of paragraphs 5 and 6, the end of this proceeding is the date on which the period for filing a review or appeal of the Board's final order in this

proceeding expires or, if a review or appeal is filed, upon issuance of a final decision on the review or appeal from which no further review or appeal can or has been taken.

I will inform the Board Secretary immediately of any changes in the facts referred to in

8.

this Declaration and Undertaking.			
Dated at	this	day of	
,			
Signature:		_	
Name:		_	
Company/Firm:		<u> </u>	
Address:			
Telephone:		_	
Fax:			
E-mail:			