

September 27, 2018

VIA COURIER & RESS FILING

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

Dear Ms. Walli:

Re: **Energy+ Inc. ("Energy+") 2019 Cost of Service Application;
Board File No.: EB-2018-0028; TMMC Written Evidence; Request for Confidentiality**

1. TMMC Written Evidence

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. ("**TMMC**") and in accordance with Procedural Orders No. 1 and No. 2 to file the Written Evidence of Jeffry C. Pollock and the Written Evidence of Melody Collis.

The evidence of Mr. Pollock, an independent expert in the areas of electric utility cost allocation and rate design, addresses Energy+ Inc.'s ("**Energy+**") proposal for a Standby distribution service rate, applicable to customers with load displacement generation, including TMMC. Mr. Pollock's evidence provides his opinions and recommendations with respect to Energy+'s Class Cost-of-Service Study and its Large Use class and Standby Rate designs. Ms. Collis is an employee of TMMC. Her evidence provides contextual information and data about the design, development and operation of TMMC's load displacement facility.

2. Confidentiality Filing

The evidence of both Mr. Pollock and Ms. Collis contains commercially sensitive information related to TMMC's consumption of electricity at its Cambridge, Ontario assembly plant. This information has been redacted in the versions of their evidence that are being filed through RESS.

In accordance with the Ontario Energy Board's ("**Board**") Practice Direction on Confidential Filings ("**Practice Direction**"), TMMC is delivering to the offices of the Board, a sealed envelope marked "Confidential" that includes two hard copies of the confidential and unredacted versions of the evidence of Mr. Pollock and Ms. Collis. The confidential pages of the unredacted versions of the evidence are marked as "Confidential" at the top of each page and the confidential portions of that page are delineated by a red line or by bold square brackets. Where the whole page is confidential, it is printed on yellow paper.

3. **The Confidential Information**

The tables below identify the specific portions of Mr. Pollock's and Ms. Collis' evidence that are being filed with the Board in confidence (collectively, the "**Confidential Information**") together with a brief description of the redacted information.

Written Evidence of Mr. Pollock

Document Title	Page Reference	Description of Redacted Information
Written Evidence of Jeffrey Pollock (pp. 1-57)	Throughout entire document	TMMC load/consumption and billing data
Schedule JP-1 Derivation of LDG Adjustments	Pages 1 and 2 of 2	TMMC demand data
Schedule JP-2 Electrical Single-Line Diagram of the Facilities Serving Large Use Customers	Page 1 of 2	Single line electrical diagram previously redacted by Energy+
Schedule JP-3 Direct Assigned Feeder Costs	Page 1 of 1	TMMC costs
Schedule JP-4 Adjusted 4NCP and 12NCP Demand Allocation Factors Excluding TMMC	Page 1 of 1	TMMC load data
Schedule JP-6 Recommended Large Use Rate Design	Pages 1 and 4 of 4	TMMC billing units and billing demand
Schedule JP-7 TMMC's Standby Service Requirements	Page 1 of 1	TMMC demand, outage and billing units
Schedule JP-9 Revenues From Recommended Standby Service Rate	Page 1 of 1	TMMC billing units

Written Evidence of Ms. Collis

Document Title	Page Reference	Reason for Confidentiality
Schedule MC-2 MMC – Energy+ – Hydro One Electrical Single Line Connection	Page 21 of 33	This diagram was redacted by Energy+ in its responses to interrogatories from TMMC.
Schedule MC-3 Aerial View of Connection Configuration	Page 22 of 33	This photo was redacted by Energy+ in its responses to interrogatories from TMMC.
Schedule MC-4 Toyota Load Profile	Pages 23-33 of 33	This schedule includes commercially sensitive load data.

4. Reasons for Claim of Confidentiality

The Confidential Information comprises commercially sensitive information, including production data, that documents TMMC's consumption of electricity and describes its loads profile. The nature of the Confidential Information is consistent with the factors that the OEB takes into account in addressing the confidentiality of filings, as described in Appendix "A" of the Practice Direction. Further, the nature of the information detailed that has been redacted is technical, commercial and/or financial information within the meaning of section 17(1) of the *Freedom of Information and Protection of Privacy Act*, RSO 1990, c.F.31 ("**FIPPA**"), as described in Appendix "A" of the Practice Direction.

The Confidential Information described in the tables above, contains technical or proprietary data and analysis that has commercial value such that public disclosure of such information would be detrimental to TMMC and prejudice TMMC's competitive position. The public disclosure of this information could adversely affect the economic and/or competitive interests of TMMC, potentially resulting in undue financial loss. The Board has already provided for the confidential treatment of similar or identical information in this proceeding in connection with Energy+'s request for such treatment of certain of its responses to interrogatories received from TMMC.

5. Request for Confidentiality

For the reasons set out above, TMMC requests that the Confidential Information described in the tables above be held in confidence and not included in the public record of this proceeding. TMMC is prepared to provide unredacted copies of the evidence to parties' counsel and external experts or consultants provided that they have executed the Board's form of Declaration and Undertaking under the Practice Direction and provided this to TMMC. TMMC reserves the right to object to the Board's acceptance of a Declaration and Undertaking from any person.

Yours very truly,

Dentons Canada LLP

(signed) Helen T. Newland

Helen T. Newland
HTN/ko
Encls.

cc: Melody Collis, TMMC
Bill Fantin, TMMC
Pete Leonard, TMMC
Jo Keaton, TMNA
John Vellone
Sarah Hughes
Parties to EB-2018-0028