

**Andrew J. Sasso**  
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September 28, 2018

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 ("Custom IR") Application for 2020-2024 Electricity  
Distribution Rates and Charges – Request for Confidential Treatment of Power Systems  
Engineering Inc.'s Dataset and Models  
OEB File No. EB-2018-0165**

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On August 28, 2018, Toronto Hydro received a request from OEB Staff to provide the dataset and models underlying Power Systems Engineering Inc.'s ("PSE") Econometric Benchmarking Report. Pursuant to Rule 10.01 of the OEB's *Rules of Practice and Procedure* and the OEB's *Practice Direction on Confidential Filings*, Toronto Hydro requests that the information relating to PSE's cost and reliability benchmarking models be kept confidential.

Descriptions of the particular information for which Toronto Hydro seeks confidential treatment and the rationale for the request are set out below. This information is of the type specifically contemplated by Appendix A to the OEB's *Practice Direction on Confidential Filings* and has been treated as confidential in other proceedings.<sup>1</sup>

On behalf of PSE, Toronto Hydro seeks confidential treatment of the following information relating to PSE's cost and reliability benchmarking models:

- a. Data used in the respective study, in the form of a Microsoft Excel spreadsheet or other files;
- b. Microsoft Excel or other files that made use of the source data and produced measures that were used, directly or indirectly, by the respective benchmarking models;
- c. Microsoft Excel or other files used to produce the Tables and Figures in the PSE benchmarking report;
- d. The computer code used to generate results for the respective benchmarking models; and
- e. Electronic GIS files used to define utility service territories and PSE defined urban congested areas.

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<sup>1</sup> See EB-2014-0116 and EB-2017-0049.

The above noted information consists of proprietary, technical, and commercially sensitive dataset and models that represents significant work undertaken by PSE. In addition, this information holds considerable commercial value. Toronto Hydro submits that PSE's dataset and models should be kept confidential as public disclosure would result in financial and competitive harm to PSE.

Please find enclosed with this letter a USB key which includes copies of PSE's dataset and models. The files in their entirety are being filed on a confidential basis and therefore are not being submitted in a redacted and un-redacted form.

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

Yours truly,

A handwritten signature in blue ink, reading "Andrew J. Sasso".

**Andrew J. Sasso**

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