

October 23, 2018

VIA COURIER AND 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. 2019 Cost of Service Application;
Board File No. EB-2018-0028; TMMC Request for Confidentiality**

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. (“**TMMC**”) to respond to the submissions of the Ontario Energy Board Staff (“**Staff**”) and Schools Energy Coalition (“**SEC**”) on TMMC’s request for confidential treatment of certain portions of the written evidence of Melody Collis and of Jeffry Pollock, filed on behalf of TMMC. This letter also addresses the submissions of Energy+ Inc. (“**Energy+**”) dated October 19, 2018 responding to Staff’s October 16th submissions on Energy+’s confidentiality claims in respect of its responses to interrogatories from TMMC.

1. TMMC’s Original Requests for Confidentiality

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

No.	Document Title	Page Reference	Description of Redacted Information
1.	Written Evidence of Jeffrey Pollock (pp. 1-57)	Throughout entire document	TMMC load/consumption and billing data
2.	Schedule JP-1 Derivation of LDG Adjustments	Pages 1 and 2 of 2	TMMC demand data
3.	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+
4.	Schedule JP-3 Direct Assigned Feeder Costs	Page 1 of 1	TMMC costs
5.	Schedule JP-4 Adjusted 4NCP and 12NCP Demand Allocation Factors Excluding TMMC	Page 1 of 1	TMMC load data

No.	Document Title	Page Reference	Description of Redacted Information
6.	Excel Version of Schedule JP-5		Revised Class Cost of Service Study
7.	Schedule JP-6 Recommended Large Use Rate Design	Pages 1 and 4 of 4	TMMC billing units and billing demand
8.	Schedule JP-7 TMMC's Standby Service Requirements	Page 1 of 1	TMMC demand, outage and billing units
9.	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
10.	Schedule MC-2 – Energy+ – Hydro One Electrical Single Line Connection	Page 21 of 33	This diagram was redacted by Energy+ in its responses to interrogatories from TMMC.
11.	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.
12.	Schedule MC-4 Toyota Load Profile	Pages 23-33 of 33	This schedule includes commercially sensitive load data.

2. TMMC's Response to Submissions on Written Evidence of Ms. Collis

Only Staff made submissions with respect to redactions of Ms. Collis' evidence. Upon closer review, with one exception (namely, Figure 7 on page 31 of 33), TMMC agrees with Staff's submission that the following portions of Ms. Collis' evidence should be publicly disclosed:

- Page 21 – The title of the schematic may be publicly disclosed.
- Page 22 – The title of the figure may be publicly disclosed.
- Page 23 – The whole page may be publicly disclosed.
- Page 25 – The last paragraph may be publicly disclosed.

- Page 26 – Only Figure 2 should be confidential; the balance of the page may be publicly disclosed.
- Page 30 – The last two paragraphs may be publicly disclosed.
- Page 32 – The last paragraph may be publicly disclosed.

The Staff submission states that the whole of page 31 may be disclosed as it does not include any Confidential Information. TMMC disagrees. Figure 7 on page 31 of 33 should not be disclosed. Figure 7 graphs Energy+ gross and net system peaks for the period January 1, 2016 to July 1, 2018. TMMC derived Figure 7 from confidential information provided by Energy+ in response to TMMC IR-14 Question 2. Moreover, the difference between Energy+'s gross and net system peaks is, by definition, TMMC's generation output at the time of the peak. This information is commercially sensitive and should not be publicly disclosed.

In addition to the above, TMMC has determined that certain other portions of Ms. Collis' evidence may also be publicly disclosed, as follows:

- Page 24 – The text below Figure 1. Figure 1, itself, is confidential.
- Page 25 – The paragraph commencing with the words "[S]ome overall conclusion from this analysis are as follows:".
- Page 28 – The first paragraph commencing "[S]ome patterns in the data are immediately apparent...", as well as the first two bullet points commencing with the words "[I]f a cogeneration unit is in operation, it generally operates..." and "[I]n each of the periods....".
- Page 29 – The bullet above Figure 5, commencing with the words "[I]ndividual months may have unique patterns".
- Page 30 – All of the text below Figure 6 may be disclosed; Figure 6, itself, is confidential.
- Page 33 – The first sentence of the paragraph under Figure 9 may be disclosed (but not the two sentences that follow).

3. **TMMC's Response to Submissions on Written Evidence of Mr. Pollock**

Staff agreed that the redacted portions of Mr. Pollock's evidence comprises commercially sensitive information, the disclosure of which could prejudice TMMC's competitive position. However, SEC expressed two concerns with respect to the redactions of Mr. Pollock's written evidence. First was that the information that is redacted on Schedule JP-6 and Table 5 (p. 36) underpins the derivation of the proposed rate for the Large User Class which, if approved, would apply to TMMC and at least one other customer, and should, accordingly, not be confidential. Second, redaction of the Excel version of Schedule JP-5 is "fundamentally at odds with an open and transparent rate-setting process".

While TMMC appreciates SEC's concerns regarding the redactions to Table 5 and Schedule JP-6 in Mr. Pollock's evidence, it maintains its requests for confidential treatment of Table 5 and Table JP-6. If the redacted information were to be disclosed, the confidential demand information of TMMC and the other Large User Class customer could be easily determined. This situation is unique to the Large User Class because there are only two customers in the class. As for SEC's concerns with respect to Schedule JP-5, we note that all of the redactions in Schedule JP-3 and most of the redactions in Schedule JP-5 are in respect of the cost of the dedicated Energy+ feeders that serve TMMC. This information is confidential to Energy+ and TMMC's redactions respect that confidentiality.

4. **TMMC's Response to Energy+ Submissions on Redactions to IR Responses**

TMMC concurs with the submissions of Staff and of Energy+ that the following portions of Energy+'s responses to interrogatories from TMMC need not be held in confidence:

- TMMC-12 Power Supply Details – Information on the nameplate capacity of TMMC's generation facility and the name of the transmission station may be publicly disclosed.
- TMMC-13 Load and Power Supply Details – Information on the nameplate capacity of TMMC's generation facility and the name of the transmission station included in response to TMMC-13, questions 6(a) and (c), may be publicly disclosed.
- TMMC-14 Energy+ Load Data (Excel File on CD) – TMMC-14, responses to question 1, 2 and 5 may be publicly disclosed. This information pertains to hourly load data for Energy+'s Cambridge system but is not information that is specific to TMMC.

Yours very truly,

Dentons Canada LLP

original signed by Helen T. Newland

Helen T. Newland
HTN/ko

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