Hydro One Networks Inc.

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Frank D'Andrea

Vice President, Regulatory Affairs & Chief Risk Officer

BY COURIER

February 28, 2019

Ms. Kirsten Walli Board Secretary Ontario Energy Board Suite 2700, 2300 Yonge Street P.O. Box 2319 Toronto, ON M4P 1E4

Dear Ms. Walli,

$EB-2018-0130-2019\ Transmission\ Revenue\ Requirement-Interrogatory\ Responses-Confidentiality\ request$

Please find attached Hydro One Networks Inc.'s (Hydro One) responses to interrogatories received in the above-noted proceeding as part of Procedural Order No.1 dated January 24, 2019. The interrogatory responses have been organized by party as indicated below:

Tab 1	OEB Staff
Tab 2	Builders Owners and Managers Association (BOMA)
Tab 3	London Property Management Association (LPMA)
Tab 4	Power Workers Union (PWU)
Tab 5	Vulnerable Energy Consumers Cooalition (VECC)
Tab 6	Consumers Council of Canada (CCC)
Tab 7	School Energy Cooalition (SEC)
Tab 8	Anwaatin
Tab 9	Energy Probe
Tab 10	Association of Major Power Consumers in Ontario (AMPCO)

Exhibit I Tab 3 Schedule 2 and Exhibit I Tab 6 Schedule 1 request materials provided to Hydro One's Board of Directors in respect of this Application. In response, Hydro One is filing presentation materials provided to its Board of Directors on October 1, 2018 comprised of materials previously presented to the Audit Committee on September 27, 2018 as follows:

- (i) Cover Memo dated October 1, 2018 ("Cover Memo")
- (ii) PowerPoint titled "Financial Forecast 2019-2022" ("PowerPoint")
- (iii) Appendix 1 titled "Business Plan Opportunities & Risks" ("Appendix 1")



- (iv) Appendix 2 titled "Transmission Rate Filing OEB Direction" ("Appendix 2")
- (v) Memo ("Memo")
- (vi) The Executive Summary for this Application ("Executive Summary") (collectively, the "Board of Directors Materials" or "BoD Materials", which is included in the responses to interrogatories as Exhibit 1 Tab 6 Schedule 1 Attachment 1)

Hydro One requests confidential treatment for some or all of the information included in items (i) through (v) of the BoD Material pursuant to Rule 10 of the OEB's Rules of Practice and Procedure and section 5.1 of the OEB's Practice Direction on Confidential Filings (the "Practice Direction"). The materials subject to this request are either irrelevant to this Application, relate to Hydro One's distribution or unregulated businesses ("Irrelevant Information"), or contain sensitive commercial information ("Confidential Information").

Hydro One is requesting to retain permanent redactions of the Irrelevant Information in the confidential version of the BoD Materials. Disclosure of all materials will be made to the OEB so that it may approve the requested redactions.

There are three versions of Exhibit 1 Tab 6 Schedule 1 Attachment 1, which will be sent to the OEB on an encrypted USB:

- Version A Fully Redacted BoD Materials in Version A have been fully redacted to exclude Irrelevant Information or Confidential Information. Version A has been filed on RESS.
- 2. Version B Confidential Information Included, Irrelevant Information Redacted BoD Materials in Version B have been redacted to exclude Irrelevant Information. Confidential information is shown in Version B and is identified within blue boxes. Version B may be reviewed by intervenors who sign the OEB's confidentiality undertaking. In this version all the Confidential Information has been characterized as also being Irrelevant Information. Blue boxes will only appear in the event the OEB panel finds that the information in question is relevant but still confidential.
- 3. Version C Unredacted BoD Materials in Version C have not been redacted and are provided for the OEB Panel's review only. Irrelevant Information is enclosed in red boxes. Confidential information is enclosed in blue boxes. Version C is provided for the OEB Panel's eyes only.

If the OEB grants Hydro One's request for confidentiality, Hydro One proposes that the OEB order the documents be disclosed, subject to any conditions the OEB may find appropriate, to only those persons that sign the OEB's Declaration and Undertaking.

Hydro One requests that any reference to the confidential information be conducted in camera to preserve its confidential nature.



In the event the confidentiality request is refused and Hydro One in turn requests that the information be withdrawn in accordance with section 5.1.12 of the Practice Direction, all persons in possession of the information will be required to destroy or return to the OEB Secretary for destruction the confidential information in accordance with section 6.1.6 of the Practice Direction.

Reasons for Requested Redactions

<u>Irrelevant Information & Information re: Distribution and Unregulated Businesses (Red Boxes)</u>
This Application relates to Hydro One's transmission business and the associated revenue requirement for 2019 only. Information in the red boxes contains data that is irrelevant to the transmission revenue requirement for 2019 and falls outside the scope of this Application, as follows:

- Information about Hydro One's distribution and unregulated businesses. Hydro One's distribution and unregulated businesses are not the subject of this Application, and information about them does not help to inform the OEB Panel in respect of its decision about the revenue requirement applied for in this Application; and
- Information about potential transmission costs and plans beyond 2019. This Application is for transmission revenue requirement for 2019 only. Potential costs and plans for years beyond 2019 do not help to inform the OEB Panel in respect of its decision about rates for 2019 which are the subject of this Application.

The PowerPoint has been redacted to the extent it includes information about the distribution business, the unregulated business or the transmission business for years beyond 2019. Appendix 1 has been redacted as it contains financial analysis relating to the unregulated business. Appendix 2 has been redacted as it contains information irrelevant to the Board of Directors' approval of this Application. The Memo has been redacted as it relates to plans that did not form the basis of this Application and pertains to 2020.



<u>Confidential Information (Blue Boxes)</u>

Information in blue boxes (and also enclosed in red boxes) contains confidential financial information of Hydro One Inc. This information is both irrelevant in that it applies to Hydro One Inc. which is unregulated, and is confidential in that it contains commercially sensitive information including information about forward looking events which may or may not occur. In addition, information relating to the years 2020 to 2022 is also forward looking financial information which is not publically available and should not be disclosed as it is irrelevant to this Application and is also confidential. This information should not be disclosed to intervenors or the public.

Sincerely,

ORIGINAL SIGNED BY FRANK D'ANDREA

Frank D'Andrea