



Ontario
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BY EMAIL

March 26, 2019

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Toronto Hydro-Electric System Limited (Toronto Hydro)
Application for 2020-2024 Rates
Provision of Working Papers Related to the Expert Evidence of Pacific
Economics Group Research LLC
Board File Number: EB-2018-0165**

Further to the Ontario Energy Board staff's (OEB staff's) cover letter pertaining to the Expert Evidence of Pacific Economics Group Research LLC (PEG) filed on March 20, 2019 with the OEB, please find attached the confidential un-redacted PEG Working Papers. The PEG Working Papers have been delivered in confidence to you and are included in the attached USB key.

The password to access the files in the USB key will be sent to you in a separate email.

Confirmation of the Request for Confidential Treatment of PEG's Working Papers in their Entirety

In the cover letter of March 20, 2019, OEB staff stated the following:

OEB staff is therefore requesting, pursuant to the Practice Direction, that the PEG Working Papers being provided in response to Toronto Hydro's request be maintained in confidence in their entirety at this time. OEB staff is currently working with PEG to determine whether any portion(s) of the PEG Working Papers can be placed on the public record, and OEB staff will advise the OEB as soon as possible in that regard. OEB staff submits that maintaining the PEG Working Papers in confidence in their entirety for the time being is the most efficient approach.

PEG is preparing the PEG Working Papers for confidential distribution as soon as possible, and is making its best efforts to have the confidential un-redacted PEG Working Papers delivered to the OEB and representatives of who have signed the OEB's Declaration and Undertaking and otherwise complied with the Practice Direction. The provision of this information by OEB staff is subject to OEB staff's right to object to any request for access pursuant to the Practice Direction.

Upon further discussion with staff at PEG, OEB staff confirms the request for confidential treatment of PEG's Working Papers in their entirety. It is not practical nor meaningful to attempt to extract PSE's working paper data, for which confidential treatment has been granted by the OEB,¹ from PEG's Working Papers. Further, PEG's Working Papers also contain data and code which PEG has acquired from third parties or developed as proprietary. As stated in the March 20, 2019 letter, "[t]he public disclosure of the PEG Working Papers may reasonably be expected to prejudice significantly the competitive positions of, and result in undue loss to PSE, PEG, and other third parties from which PSE and PEG may have obtained information incorporated into the PEG Working Papers".

Yours truly,

Original signed by

Keith C. Ritchie
Project Advisor, Application Policy & Climate Change

¹ Per the Decision on Confidentiality and Procedural Order No. 2, November 21, 2018