

September 13, 2019

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

Dear Ms. Walli:

**Re: Alectra Utilities Corporation (“Alectra Utilities”)
Incentive Regulation Mechanism (“IRM”) Application for 2020 Electricity
Distribution Rates and Charges (OEB File No. EB-2019-0018)
Request for Confidential Treatment of Interrogatory Responses relating to
M-Factor Proposal**

We are counsel to Alectra Utilities in the above-referenced proceeding. Alectra Utilities filed its interrogatory responses relating to the M-Factor proposal on September 13, 2019. Pursuant to Rule 10.01 of the Ontario Energy Board’s (OEB) *Rules of Practice and Procedure* and the OEB’s *Practice Direction on Confidential Filings* (the “**Practice Direction**”), Alectra Utilities hereby requests the confidential treatment, by means of redaction, for certain portions of the following third party consultant retainer agreements, which are being filed in response to interrogatories as indicated:

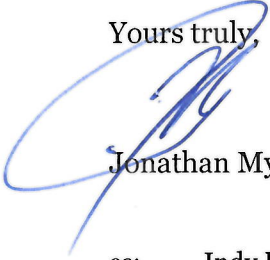
- Innovative Research Group retainers, which are provided as Attachments 1-3 to interrogatory response, 14-MANA-39; and
- Vanry & Associates Inc. and Kinectrics Inc. retainers, which are provided as Attachments 1 and 2, respectively, to interrogatory response, 15-MANA-15 (collectively referred to as “**Consultants Retainers**”);

The redacted portions of the Consultant Retainers consist of commercially sensitive pricing terms agreed upon by Alectra Utilities and each of its consultants through commercial negotiations. Alectra Utilities is advised by the consultants that disclosing this information on the public record could prejudice the competitive positions of the consultants in their future negotiations to provide similar services to Alectra Utilities or other potential clients.

The information described above, for which Alectra Utilities requests confidential treatment, is consistent with the types of information for which confidential treatment is contemplated in Appendix ‘A’ to the Practice Direction and for which the OEB has consistently granted confidential treatment in prior proceedings.

Please note that the appendices to this request are being provided to the OEB in a separate, sealed envelope that is marked "Confidential" and which has been excluded from the electronic version of this request. Non-confidential, redacted versions of the relevant documents have been incorporated into the interrogatory responses as filed.

Yours truly,



Jonathan Myers

cc: Indy Butany-DeSouza, Alectra Utilities
Charles Keizer, Torys LLP
All Parties

APPENDIX 'A'

Confidential Versions of the Innovative Retainers

[Note: A copy of this Appendix has been filed confidentially with the OEB in accordance with the *Practice Direction on Confidential Filings*]

APPENDIX 'B'

Confidential Excerpt of the Vanry & Associates Retainer

[Note: A copy of this Appendix has been filed confidentially with the OEB in accordance with the *Practice Direction on Confidential Filings*]

APPENDIX 'C'

Confidential Excerpt of the Kinectrics Retainer

[Note: A copy of this Appendix has been filed confidentially with the OEB in accordance with the *Practice Direction on Confidential Filings*]