

By RESS and Courier

March 13, 2020

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

Dear Ms. Walli:

**Subject: Hydro Ottawa Limited (“Hydro Ottawa”)
Custom Incentive Rate-Setting (“Custom IR”) Application for 2021-2025 Electricity
Distribution Rates and Charges - Request for Confidential Treatment of Clearspring
Energy Advisors Working Papers
OEB File: EB-23019-0261**

On February 21st, OEB Staff requested that Hydro Ottawa provide the working papers that support the *Economic Benchmarking Study of Hydro Ottawa’s Total Cost and Reliability* prepared by Clearspring Energy Advisors (“Clearspring”) and submitted as Attachment 1-1-12(A) in Hydro Ottawa’s Custom IR Application. In accordance with Rule 10.01 of the Ontario Energy Board’s *Rules of Practice and Procedure* as last revised October 28, 2016 and its *Practice Direction on Confidential Filings* as last revised on October 28, 2016, Hydro Ottawa requests that the working papers related to Clearspring’s total cost and reliability benchmarking study be held in confidence by the Board.

As contemplated in Appendix A of the OEB’s *Practice Direction on Confidential Filings*, the working papers requested consist of proprietary, technical and commercially sensitive data and models that represent significant work undertaken by Clearspring. Placing such data on the public record would cause prejudice to Clearspring’s competitive position and has the potential to produce significant financial harm to Clearspring.

On behalf of Clearspring, Hydro Ottawa seeks confidential treatment of the following information relating to Clearspring’s total cost and reliability benchmarking data and models:

1. Data used in the respective study, in the form of a Microsoft Excel spreadsheet or other files;
2. 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;
3. Microsoft Excel or other files used to produce the Tables and Figures in the Clearspring benchmarking report;
4. The computer code used to generate results for the respective benchmarking models; and
5. Electronic GIS files used to define utility service territories and Clearspring defined congested areas.

Hydro Ottawa further submits that this type of information has been treated as confidential in other proceedings.¹

As such, please find enclosed with this letter a USB key which includes copies of Clearspring'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.

Should you have any questions, please do not hesitate to contact me.

Yours truly,

[original signed by]

Gregory Van Dusen

Director, Regulatory Affairs

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¹ Most recently EB-2017-0049 and EB-2018-0165