

BY EMAIL: brenda.macdonald@opg.com

September 2, 2020

Ms. Brenda MacDonald Vice President, Regulatory Affairs Ontario Power Generation 700 University Avenue Toronto ON M5G 1X6

Dear Ms. MacDonald:

Re: Must-Offer Condition Agreement – Ontario Power Generation Inc.'s Request for Confidentiality

Thank you for your July 29, 2020 letter relating to the Must-Offer Condition Agreement between Ontario Power Generation Inc. (OPG) and the Independent Electricity System Operator (IESO). I am writing to seek clarification in respect of OPG's request for confidentiality.

Your letter states that "The information subject to this request contains commercially and operationally sensitive information and, if publicly disclosed, could give other Market Participants an unfair advantage over OPG in the electricity market. The subject information specifically relates to components in OPG's offer quantity/price strategies, operational restrictions, and confidential IESO contractual requirements that may relate to potential non-compliances with the Must-Offer Condition Agreement."

I would ask that you elaborate on your request. In particular, it is not immediately apparent why the proposed redactions to Schedules 4.4.1.1, 4.4.1.2 and 5.1 of the Agreement are necessary. In other words, it is not evident why the information OPG asks to redact could, if disclosed, harm OPG's interests, or why it otherwise qualifies for



confidentiality under the OEB's <u>*Practice Direction on Confidential Filings*</u>, including Appendix A (Considerations in Determining Requests for Confidentiality).

Your response would be appreciated by **September 8, 2020**.

Yours truly,

Original signed by

Ryan Holder Manager – Industry Policy & Compliance

c.c. Darren Finkbeiner, IESO - <u>darren.finkbeiner@ieso.ca</u>