

BY EMAIL: margaret.koontz@aturapower.com

September 2, 2020

Ms. Margaret Koontz Manager, Market Affairs Atura Power 202 – 2800 High Point Drive Milton, ON L9T 6P4

Dear Ms. Koontz:

Re: Must-Offer Condition Agreement – Portlands Energy Centre L.P.'s Request for Confidentiality

Thank you for your July 29, 2020 letter relating to the Must-Offer Condition Agreement between Portlands Energy Centre L.P. (PEC LP) and the Independent Electricity System Operator (IESO). I am writing to seek clarification in respect of PEC LP'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 PEC LP in the electricity market. The subject information specifically relates to components in PEC LP'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 PEC LP asks to redact could, if disclosed, harm PEC LP'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 and Compliance

c.c. Darren Finkbeiner, IESO - darren.finkbeiner@ieso.ca