

BY RESS

March 5, 2021

Ms. Christine Long
Registrar
Ontario Energy Board
27th Floor - 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0290 Application by Ontario Power Generation Inc.
For 2022-2026 Payment Amounts (the "Application")
Request to Limit Access to Labour-Sensitive Information**

The purpose of this letter is to further address the scope of Ontario Power Generation's ("OPG") request for confidential treatment in relation to The Report on the Estimated Accounting Cost for Post-Employment Benefit Plans for Fiscal Years 2021 to 2026 (the "**Aon Report**"). More specifically, it is to make clear that this document contains labour-sensitive information and, prior to the OEB's decision on confidentiality and in the event the Ontario Energy Board ("**OEB**") designates portions of the Aon Report as confidential, OPG requests that access to such report only be provided to those individuals who have filed a Declaration and Undertaking and, in the case of intervenor representatives of the Power Workers' Union ("**PWU**") and Society of United Professionals ("**Society**"), that they also file an affidavit with the OEB affirming that they are external to and at arms-length from the PWU and Society, as applicable, and that they are not and will not be involved in any collective bargaining-related activities on their behalf.

OPG's request in the above respect is consistent with the process set out by the OEB in Procedural Order No. 4 of EB-2016-0152.

As indicated in OPG's confidentiality submissions dated December 31, 2020, the Aon Report, set out in Attachment 1 to Ex. F4-3-2 of OPG's pre-filed evidence, contains information that could prejudice OPG's position in the upcoming rounds of collective bargaining with both labour unions. This report includes cost estimates and underpinning assumptions that are labour-sensitive because they consider pension, other post-employment benefits and associated headcount projections related to certain Pickering downsizing processes expected to take place during the period. The assumptions and estimates depend on, and/or may influence, collective bargaining outcomes related to the anticipated Pickering downsizing exercise. Therefore, disclosure of such

information to representatives who are not at arm's length to the PWU and Society, and those who are involved in collective-bargaining activities on their behalf, may prejudice OPG's position in upcoming rounds of collective bargaining. This would not have been a factor in prior Aon reports filed in OPG's previous applications.

OPG will make full submissions on confidentiality once all parties' submissions have been received. Should the OEB require any further information or clarification as to the requests made herein, please contact our legal counsel as required.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Evelyn Wong', with a stylized, flowing script.

Evelyn Wong

cc: Aimee Collier, OPG
Crawford Smith, Lax O'Sullivan Lisus Gottlieb LLP
Charles Keizer, Torys LLP