



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

Sent via email and RESS CC to Parties of Record in EB-2021-0009

Dear Ms. Long,

RE: EB-2021-0009 Brantford Power Inc. (BPI) -OEB Decision on Confidentiality

In the OEB's Decision on Confidentiality in the above-mentioned case, dated July 22, 2021, BPI was ordered to:

- 1. provide un-redacted copies of Attachment 4-M to individuals that have signed and filed a Declaration and Undertaking form;
- 2. Maintain the permanent redactions of the information on slide 14 of Attachment 4-K; and
- 3. Provide the OEB and all parties an updated public version of Attachment 4-K and provide the OEB only an updated version of the confidential Attachment 4-K.

Consistent with these orders, BPI has provided an un-redacted copy of Attachment 4-M to the parties that have filed a Declaration and Undertaking form to date. BPI has also prepared an updated version of Attachment 4-K.

With respect to Attachment 4-K, the OEB has determined that some of the redacted information on slide 14 is relevant to the proceeding, and directed BPI to provide a summary of certain items. BPI has provided a summary of the information requested by the OEB, however BPI has shown job bands with three or fewer positions aggregated with other bands, rather than showing the number of positions in each band. This approach is consistent with Chapter 2 of the *Filing Requirements For Electricity Distribution Rate Applications- 2021 Edition for 2022 Rate Applications* (released June 24, 2021, p. 31):

"Where there are three or fewer employees in any category, the distributor must aggregate this category with the category to which it is most closely related."

BPI believes this is necessary to prevent the inference of personal information where readily available information could be used to deduce compensation-related information of identifiable individuals. BPI hopes this proposal will be acceptable to the OEB and the parties in the spirit of ensuring transparency while also protecting the privacy of individuals.

Sincerely,

Oana Stefan

Manager, Regulatory Affairs | Brantford Power Inc.

150 Savannah Oaks Drive, P.O. Box 308, Brantford, Ontario N3T 5N8 519-751-3522 ext. 5477 ostefan@brantford.ca | www.brantfordpower.com |