



August 24, 2021

Delivered by Email & RESS

Ms. Christine Long, Registrar
Ontario Energy Board
P.O.Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2021-0009 Brantford Power Inc. (“BPI”) – Responses to Interrogatories – 4X-EP-20

In the Ontario Energy Board’s (“OEB”) Decision on Confidentiality dated August 19, 2021 (“Decision on Confidentiality”), BPI was ordered to file with the OEB a revised public version of interrogatory response 4X-EP-20 reflecting the findings.

Consistent with the Decision on Confidentiality, BPI is filing a copy of the table in the interrogatory response to 4X-EP-20 (the “Table”). However, BPI has redacted some figures in the Table, specifically the compensation numbers for the category “Level 6 or Below” line item and the total compensation amounts, as it would disclose personal information pertaining to an individual.

In the Decision on Confidentiality, the OEB stated that BPI proposed to redact the information in the Table “on the basis that when read in conjunction with the information in response to 4-EP-21, it would disclose personal information relating to an individual.”¹ In the comment filed with the Table, BPI stated that the Table would enable the inference of personal information when used together with information provided elsewhere (but did not specify 4-EP-21).

The reason for the redactions in the Table is that when it is read in conjunction with the table provided in 4.0-VECC-49, which provides the positions by department contributing to the changes in FTEs for the years from 2017 to 2022, one can infer personal information related to an individual.

Specifically, as provided in the table in 4.0-VECC-49 the change from 2021 to 2022 for Regulatory Analyst is (1.0). Correspondingly, in the Table in the first row “Level 6 or Below”,

¹ E-2021-0009, Decision on Confidentiality dated August 19, 2021, at page 3.



there is a decrease of 1 incumbent from 2021 to 2022. According to the table in 4.0-VECC-49, there are only two Regulatory Analysts. By knowing the difference of compensation in the Table for the “Level 6 or Below” category, the salary of the Regulatory Analyst who has departed would be disclosed. Similarly, the total compensation amounts are also redacted because one would be able to calculate the “Level 6 or Below” category using the totals. Therefore, BPI has limited its redactions to these two areas of the Table in its filing.

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

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