

August 23, 2024

VIA RESS

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: EB-2024-0063 - Generic Proceeding – Cost of Capital and
Other Matters - Ontario Energy Association ("OEA")
Interrogatory Responses**

The OEA filed Interrogatory Responses prepared by Concentric Energy Advisors and the OEA on behalf of the CLD+ⁱ on August 22, 2024.

In accordance with the OEB's revised Practice Direction on Confidential Filings effective December 17, 2021 (the "**Practice Direction**"), the OEA is requesting confidential treatment of portions of several interrogatory responses and/or attachments to the interrogatory responses. Schedule A to this letter sets out details of the requests being made in each category.

As required by the Practice Direction, the OEA has filed confidential un-redacted versions of each of the applicable documents, identifying all portions of the document for which confidential treatment is claimed. There are two items that the OEA requests that an exception to the Practice Direction be granted.

First, as explained in Schedule A, the confidential filings include attachments from S&P Capital IQ. This information was obtained by Concentric through a license that prohibits public dissemination. A redacted version would have to redact all of the information on the page and would be superfluous. Accordingly, the OEA has provided a slip sheet in the non-confidential filing that indicates the attachment is confidential. We trust that this is sufficient, and a fully redacted version of the attachments need not be filed.

Second, the OEA notes that in accordance with the Practice Direction, representatives of parties who sign the OEB's Declaration and Undertaking will be provided with unredacted versions of the confidential documents. On behalf of OPG the OEA requests that the un-redacted version of OPG's List of Outstanding Debt Supporting Regulated Operations need not be filed. The redacted information in this document relates to highly confidential debt terms. This is commercially sensitive information, and access to such information could give other parties information not otherwise available that could (at least theoretically) provide some advantage unrelated to the proceeding. The OEB's ability to limit who can receive certain confidential documents is set out in section 6.1.7 of the Practice Direction.

Yours truly,

A handwritten signature in black ink, appearing to read "Vince Brescia", written in a cursive style.

Vince Brescia
President and CEO
Ontario Energy Association

ⁱ The CLD+ consists of: Alectra Utilities; Elexicon Energy Inc.; Enbridge Gas Inc.; Hydro One Networks Inc.; Hydro Ottawa Limited; Ontario Power Generation; Toronto Hydro; and Upper Canada Transmission 2

Schedule “A”

No.	Document	Description of document	Basis for Confidentiality Claim
1.	IGUA 15b Attachment 1 (Confidential)	S&P Capital IQ Rate Case Statistics	The documents and information are from S&P Capital IQ and S&P Global. This information was obtained by Concentric through a license that prohibits public dissemination. In order to abide by the terms of the licence agreement, the documents must be kept confidential.
2.	IGUA 20b Attachment 2 (Confidential)	S&P Capital IQ Rate Case Statistics	
3.	IGUA 20b Attachment 3 (Confidential)	S&P Capital IQ Rate Case Statistics	
4.	IGUA 20B Attachment 4 (Confidential)	S&P Capital IQ Data re Peer Group Capital Structure	
5.	IGUA 20b Attachment 5 (Confidential)	S&P Capital IQ Data re Peer Group Capital Structure	
6.	SEC 45 Attachment 2 (Confidential)	S&P Capital IQ Credit Rating Information	
7.	SEC 46 Attachment 2 (Confidential)	S&P Capital IQ Credit Rating Information	
8.	SEC 47b Attachment 1 (Confidential)	S&P Global Rate Case History information	
9.	CME 9a Attachment 1 (Confidential)	S&P Global Article re Extreme Weather	
10.	SEC 41 (d) – OPG Table	OPG’s List of Outstanding Debt Supporting Regulated Operations	The redacted information in this document relates to highly confidential debt terms. This is commercially sensitive information, and access to such information could give other parties information not otherwise available that could (at least theoretically) provide some advantage unrelated to the proceeding.
11.	Staff 18 (Confidential)	Answer to Exhibit N-M2-12-OEB Staff-18	The information and analysis contained in the redacted paragraph is highly sensitive and not intended for public distribution. The paragraph contains private and sensitive FFO/Debt forecasts that are not publicly available. While the information may be of assistance to the board, it is not intended for public distribution.