

November 21, 2024

BY RESS

Ms. Nancy Marconi
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

Dear Ms. Marconi:

**RE: Lakeland Power Distribution Ltd.
EB-2024-0039
2025 Cost of Service Rate Application Re-Submission**

Lakeland Power Distribution Ltd. (“**LPDL**”) is filing with the Ontario Energy Board (“**OEB**”) certain information in its Cost of Service application that is confidential and/or subject to the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”). LPDL is hereby requesting confidential treatment of the information in the table below pursuant to sections 9A, 10.01 and 10.02 of the OEB’s *Rules of Practice and Procedure* (revised March 6, 2024) and sections 5.1.1, 5.1.2 and 10 of the OEB’s *Practice Direction on Confidential Filings* (revised December 17, 2021, “**Practice Direction**”).

Reference	Reason for Confidentiality
Exhibit 4, PDF pages 218- 219, 226, 229	LPDL is filing portions of certain agreements on a confidential basis as the redactions relate to unit pricing and/or billing rates and are presumptively confidential under section 4 of the Practice Direction. ¹
Exhibit 4, PDF pages 218, 220, 223-233	LPDL is filing portions of certain agreements on a confidential basis and has redacted all signatures and initials as they are presumptively confidential under section 4 of the Practice Direction. ²
Exhibit 4, PDF page 230-233	LPDL is filing portions of certain agreements on a confidential basis as the redactions relate to specific information regarding information technology infrastructure within LPDL’s service area that could affect the security of LPDL and potentially external parties, and should

¹ EB-2024-0022/EB-2024-0096, Decision on Confidentiality, October 7, 2024, pg. 5.

² EB-2024-0022/EB-2024-0096, Decision on Confidentiality, October 7, 2024, pg. 5.

	remain redacted. ³ The redacted information includes IP addresses and laptop serial numbers.
Exhibit 5, PDF pages 23-24	LPDL is filing a Letter of Agreement with TD Commercial Banking that contains bank account numbers for LPDL. The redaction of bank account information protects LPDL's commercial or financial information, which LPDL has consistently treated in a confidential manner. LPDL requests that this information remains permanently redacted in a manner similar to 9A.02 of the <i>Rules of Practice and Procedure</i> .
Exhibit 6, PDF pages 29 and 48-49	The redacted information is "personal information" under the <i>Freedom of Information and Protection of Privacy Act</i> as it pertains to names, salary, and/or compensation benefits for individual LPDL employees. The OEB has previously treated compensation about identifiable individuals as personal information and did not provide it to parties who would otherwise be allowed to have access to confidential information in accordance with section 6 of the Practice Direction.

An electronic copy of the redacted revised documents will be submitted through the OEB e-Filing service RESS.

If you have any further questions, please do not hesitate to contact me.

Respectfully submitted,



Darren Bechtel
CFO
Lakeland Holding Ltd.

³ EB-2023-0013, Decision on Confidentiality, February 27, 2024, pg. 3.