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**File No. 92437.19**

November 21, 2024

**BY EMAIL & RESS**

Ms. Nancy Marconi  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P1E4

Dear Ms. Marconi:

**Re: Welland Hydro-Electric System Corp. (“WHESC”) Cost of Service Application for 2025 Electricity Distribution Rates (“Application”) Ontario Energy Board (“OEB”) File No. EB-2024-0058 Interrogatory Responses**

On October 9, 2024, the OEB issued Procedural Order No. 1 setting out a process for interrogatories on the Application. On November 1, 2024, OEB Staff, School Energy Coalition, Vulnerable Energy Consumer Coalition, and Coalition of Concerned Manufacturers and Businesses of Canada filed written interrogatories to WHESC. Enclosed are WHESC’s responses to those interrogatories.

WHESC is hereby requesting confidential treatment of the response to interrogatory 2-Staff-12 (Attachment B) pursuant to sections 10.01 and 10.02 of the OEB’s *Rules of Practice and Procedure* (revised March 6, 2024) and sections 5.1.1 and 5.1.2 of the OEB’s *Practice Direction on Confidential Filings* (revised December 17, 2021) (“**Practice Direction**”).

Location	Reason for Confidentiality
2-Staff-12, Attachment B, pg. 37 & Schedule C, page 6	WHESC has also redacted any signatures in the Master Services Agreement as the OEB has, on other occasions, allowed the signatures in agreements of this kind to remain confidential. <sup>1</sup>
2-Staff-12, Attachment B, Schedule C, page 4	WHESC is filing a portion of a Master Services Agreement on a confidential basis. The redactions relate to unit pricing and/or billing rates and are presumptively confidential under section 4 of the Practice Direction. The

<sup>1</sup> EB-2024-0022 / EB-2024-0096, Decision on Confidentiality (Essex Powerlines Corporation), October 7, 2024.

	<p>OEB has previously granted confidential treatment for unit pricing and billing rates in agreements.<sup>2</sup></p> <p>Alternatively, the redactions are confidential technical, commercial or financial materials that WHESC has consistently treated in a confidential manner. Disclosure of this information could produce a significant loss or gain. The confidential information would disclose a detailed scope of work, along with unit pricing, that could be used by competitors to undercut or unfairly compete with the contracting parties. Further, the information could interfere with future negotiations with alternative vendors as they would have access to pricing information that was previously acceptable to WHESC.</p>
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Please contact the undersigned with any questions.

Yours truly,

**BORDEN LADNER GERVAIS LLP**



Colm Boyle

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<sup>2</sup> *Ibid.*