



Ontario  
Energy  
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de l'énergie  
de l'Ontario

**BY EMAIL**

December 20, 2024

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
[Registrar@oeb.ca](mailto:Registrar@oeb.ca)

Dear Ms. Marconi:

**Re: Ontario Energy Board (OEB) Staff Submission  
Lakeland Power Distribution Ltd. (Lakeland Power)  
Application for 2025 Electricity Distribution Rates  
OEB File Number: EB-2024-0039**

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Please find attached OEB staff's submission in the above referenced proceeding, pursuant to Procedural Order No. 1.

Yours truly,

Georgette Vlahos  
Advisor, Electricity Distribution Rates

Encl.

cc: All parties in EB-2024-0039



# **ONTARIO ENERGY BOARD**

## **OEB Staff Submission on Confidentiality**

**Lakeland Power**

**Application for 2025 Rates**

**EB-2024-0039**

**December 20, 2024**

## Introduction

Lakeland Power Distribution Ltd. (Lakeland Power) filed a cost of service application with the Ontario Energy Board (OEB) on October 31, 2024 under section 78 of the *OEB Act*<sup>1</sup> seeking approval for changes to the rates that charges for electricity distribution, beginning May 1, 2025.

By letter dated November 21, 2024, Lakeland Power requested that the OEB allow certain information to be redacted from the public record.<sup>2</sup> Redacted versions of the exhibits were filed for the public record of this proceeding and unredacted versions were filed confidentially with the OEB pursuant to the [Rules of Practice and Procedure](#) and the [Practice Direction on Confidential Filings](#) (Practice Direction). The confidentiality requests relate to the following:

| Item | Request for Confidential Treatment  | Reference                              |
|------|---|--|
| 1    | Information related to unit pricing and/or billing rates  | Exhibit 4, PDF Pages 218-219, 226, 229 |
| 2    | Information relating to signatures and initials   | Exhibit 4, PDF Pages 218, 220, 223-233 |
| 3    | Specific information regarding information technology infrastructure within Lakeland Power's service area | Exhibit 4, PDF Pages 230-233           |
| 4    | Bank account numbers contained in a Letter of Agreement with a banking institution                        | Exhibit 5, PDF Pages 23-24             |
| 5    | Names, salary, and/or compensation benefits for individual Lakeland Power employees                       | Exhibit 6, PDF Pages 29 and 48-49      |

Lakeland Power's reasons for the confidentiality requests for each item are outlined in its November 21, 2024 letter.

With respect to item 5, the OEB in Procedural Order No. 1 agreed that information regarding the employee names and compensation is protected from disclosure under the *Freedom of Information and Protection of Privacy Act* and shall remain redacted. Further, the OEB stated that parties that wish to object to the confidentiality requests for items 1, 2, 3 and 4 should refer to sections 4 and 5 of the Practice Direction and follow the timelines and process in sections 5.1.6 and 5.1.7 of the Practice Direction.<sup>3</sup>

In this submission, OEB staff is only providing comments on certain requests and/or aspects of such requests relating to items 1 and 2 outlined in the list above.

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<sup>1</sup> S.O. 1998, c. 15, (Schedule B)

<sup>2</sup> EB-2024-0039, Lakeland Power Letter - 2025 Cost of Service Rate Application Re-Submission, November 21, 2024

<sup>3</sup> EB-2024-0039, Procedural Order No. 1, December 17, 2024

## OEB Staff Submission

### Item 1

The redactions in Item 1 include portions of a GIS Shared Services Agreement and IT Shared Service Agreement between Lakeland Power and one of its affiliates. Lakeland Power submitted that the redacted information consists of unit pricing and/or billing rates, and that this information is presumptively confidential under section 4 of the Practice Direction.

OEB staff has no concerns with the redactions proposed specifically relating to the unit pricing and/or billing rates. However, Lakeland Power has also proposed to redact the agreement term lengths on PDF pages 218 and 219. OEB staff notes that the information relating to the length of the term of the agreement does not fall within the “Categories of Information that will Presumptively Be Considered Confidential” in accordance with the Practice Direction.<sup>4</sup> As such, OEB staff is unclear of the basis for redacting the term lengths on PDF pages 218 and 219.

### Item 2

The redactions in Item 2 include portions of a GIS Shared Services Agreement and IT Shared Service Agreement between Lakeland Power and one of its affiliates. Lakeland Power submitted that it has redacted all signatures and initials as they are presumptively confidential under section 4 of the Practice Direction.

OEB staff recognizes that the OEB has on other occasions, allowed the signatures in agreements of this kind to remain confidential.<sup>5</sup> However, OEB staff does not agree with Lakeland Power’s statement that signatures and initials are presumptively confidential under section 4 of the Practice Direction.<sup>6</sup> OEB staff submits that the OEB may determine that it is appropriate to redact the signatures in this case; however it should not be on the basis that the information is presumptively confidential.

*All of which is respectfully submitted*

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<sup>4</sup> Practice Direction, Appendix B

<sup>5</sup> EB-2024-0022/EB-2024-0096, Decision on Confidentiality, October 7, 2024

<sup>6</sup> Practice Direction, Appendix B