



Via RESS

April 15, 2025

Ms. Nancy Marconi, Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi:

Subject: Confidentiality Request
Hydro Ottawa Limited (Hydro Ottawa)
Custom Incentive Rate-Setting (Custom IR) Application for 2026-2030
Electricity Distribution Rates and Charges
OEB File: EB-2024-0115

On April 15, 2025, Hydro Ottawa submitted the above-noted Custom Incentive Rate-Setting Application for the period 2026-2030 with respect to electricity distribution rates and charges.

As per Section 5 of the Ontario Energy Board's *Practice Direction on Confidential Filings* (Practice Direction), Hydro Ottawa is requesting confidential treatment for specific information within Attachment 1-3-4(A) - Corporate Productivity Scorecard, as detailed in Appendix A of this Letter.

As stipulated by the Practice Direction, a separate, confidential, un-redacted, password-protected version of Attachment 1-3-4(A) has been submitted through RESS, identifying the portions for which confidentiality is sought. A corresponding non-confidential, redacted version has also been uploaded via RESS, and is located on page 555 of Part 1 of Exhibit 1 within Hydro Ottawa's 2026-2030 Original Custom IR Application.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Signed by:

April Barrie

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April Barrie

Director, Regulatory Affairs
Directeur, Affaires réglementaires

AprilBarrie@hydroottawa.com

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CC: Charles Keizer, Tory's LLP

Appendix A

Attachment 1-3-4(A)	General Description	Rationale
Item 1	Operational information regarding generation activities of an affiliate	<p>- Not relevant: The information is not relevant to the proceeding as it consists of operational generation information of a commercial nature that does not pertain to the regulated utility and will not be of assistance to the OEB or intervenors in determining the issues part of the proceeding (Practice Direction, Part 11).</p> <p>- Prejudice competitive position: The information is confidential commercial information that, if disclosed, would give the affiliate's competitors access to sensitive commercial information that would prejudice the affiliate's competitive position (<i>Practice Direction</i>, Appendix A, Part (a)(i)). Other parties would gain visibility into the affiliate's operational practices and performance which would provide them with an unfair competitive advantage.</p> <p>- Consistent confidential treatment: The information in question is sensitive commercial information that is consistently treated as confidential by Hydro Ottawa (Practice Direction, Appendix A, Part (b)).</p>
Items 2 & 3	Co-mingled Financial Information of affiliates	<p>- Not relevant: The information is not relevant to the proceeding as it consists of financial information that is consolidated with the unregulated affiliate(s) of the utility, and, as such, it will not be of assistance to the OEB or intervenors in determining the issues part of the proceeding, including the financial performance of the regulated utility (Practice Direction, Part 11). In EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8 (September 26, 2024) (p.10), the OEB found that consolidated financial information that includes a utility's affiliates and non-rate regulated activities does not provide probative value and is not relevant to the issues to be decided in a rate proceeding.</p> <p>- Prejudice competitive position: The information is confidential financial information about the financial performance of Hydro Ottawa affiliates that, if disclosed, could give the affiliate's competitors access to sensitive financial information that could prejudice the affiliate's competitive position (Practice Direction, Appendix A, Part (a)(i)). Hydro Ottawa notes that Appendix B recognizes the harm of disclosing financial information of unregulated affiliates involved in competitive business as it presumes confidential treatment for such information. In the circumstances, the financial information consists of a similar type of information that might be found in a financial statement (including certain identical financial metrics), and as such, it should be afforded confidential treatment. The fact that the information is included in a productivity performance measure report rather than a financial statement does not change the risks associated with its disclosure.</p> <p>- Consistent confidential treatment: The information in question is sensitive financial information that is consistently treated as confidential by Hydro Ottawa (Practice Direction, Appendix A, Part (b)).</p>