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BY EMAIL & RESS
registrar@oeb.ca

Mr. Ritchie Murray
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Mr. Murray:

Re: Oshawa PUC Networks Inc. (“Oshawa Power”)
Application for 2026 Distribution Rates (EB-2025-0014) (“Application”)
Interrogatory Responses and Confidentiality Request

We represent Oshawa Power in the above noted matter. On June 30, 2025, the Ontario Energy Board (“OEB”) issued Procedural Order No.2 setting out a process for OEB staff and intervenors to file consolidated written interrogatories. On July 10, 2025 OEB staff filed the consolidated written interrogatories with the OEB and served them on Oshawa PUC Networks. Please find enclosed the written interrogatory responses of Oshawa Power.

Oshawa Power is filing with the Ontario Energy Board (“OEB”) certain information in the interrogatory responses that is confidential and contains personal information. Oshawa Power is hereby requesting confidential treatment of the information in the table below 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, 5.1.2 and 10 of the OEB’s Practice Direction on Confidential Filings (revised December 17, 2021, “Practice Direction”).

Interrogatory / Description	Rationale Supporting Redaction
1-SEC / Staff / CCC / PP / CCMBC / VECC-9 a)	<u>Presumptively Confidential</u> The redacted information in these documents relates to unit pricing, billing rates and the underlying dataset of a third party regarding the assumptions and unit costs that went into generating the cost estimate for the building. The redacted information also includes any information that could be used to back-

Attachment 1-2 – Class B Estimate	calculate or recreate the third party’s unit pricing, billing rates or the underlying dataset. Accordingly, this information is presumptively confidential in accordance with section 4 and Appendix B of the OEB Practice Direction.
Attachment 1-3 – New HQ Location Summary Report	<p><u>Confidential</u></p> <p>The entire document has been redacted on the basis that the building is currently the subject of a competitive procurement process that has not yet concluded. Disclosure of an independent assessment of costs by a consultant retained by Oshawa Power will significantly prejudice the competitiveness of the bids that will be received as part of the procurement process, meaning it will interfere significantly with negotiations being carried out by Oshawa Power. If Oshawa Power discloses the price of the building it may be expecting as part of the procurement process, this will undermine whether it will receive true market based bids.</p>
1-SEC / CCMBC / VECC-12	<p><u>Confidential</u></p> <p>For the same reason provided in 1-SEC / Staff / CCC / PP / CCMBC / VECC-9 a), the redacted information pertains to a competitive procurement process that has not yet concluded</p>
1-SEC-26 Attachment 1-7	<p><u>Confidential</u></p> <p>The terms of the agreement at Attachment 1-7 prohibits a party from disclosing the fact that the subject agreement has been entered into and the details therein as disclosure could share highly sensitive commercial details that adversely affect the parties’ competitive position. Oshawa Power is requesting that this agreement be redacted in full. In any event, this agreement has no relevance to setting rates for Oshawa Power in this proceeding. Oshawa Power cannot not provide more detail in respect of this confidentiality request without disclosing the nature of the agreement itself.</p>
2-Staff/CCMBC- 70 (c)	<p><u>Presumptively Confidential</u></p> <p>The redacted information in the column “Approximate Cost” is unit pricing that has been provided by the third party vendor for the services being offered. Oshawa Power understands from this vendor that this information is commercially sensitive and confidential. Accordingly, this information is presumptively confidential in accordance with section 4 and Appendix B of the OEB Practice Direction.</p>

4-CCC/VECC-130 b) 4-SEC/CCMBC-165 (PDF pg 12) – Attachment 4-6	<p><u>Presumptively Confidential</u></p> <p>The redacted information in the column “Rate (Pre GST)” is unit pricing and/or billing rates of a third party for the services being offered. Oshawa Power understands from this vendor that this information is commercially sensitive and confidential. Accordingly, this information is presumptively confidential in accordance with section 4 and Appendix B of the OEB Practice Direction.</p>
4-CCC/VECC-154 b) 4-SEC-166 Attachment 4-5 Korn Ferry Compensation Market Analysis	<p><u>Not Relevant</u></p> <p>At page 5 of this attachment there are several job titles for competitive affiliates that are not relevant to this Application. Entries in the table related to third party affiliates should remain redacted.</p> <p><u>Personal Information / Confidential</u></p> <p>The redacted information is personal information for several reasons:</p> <ul style="list-style-type: none"> • Page 5: Korn Ferry was retained to evaluate compensation for 35 Oshawa Power positions. Each of these positions can be traced to an individual employee at Oshawa Power and the information has not been sufficiently aggregated to permit disclosure. Having compensation information and job title would allow the inference of compensation for identifiable individuals. Oshawa Power requests that this information remain redacted on the basis of personal information. • Pages 7-9: Disclosing the ranges and corresponding pay bands for compensation at Oshawa Power may allow the inference of compensation for identifiable individuals. While Oshawa Power is not requesting that the information on these pages remain redacted and believes they should be shared with parties that sign an undertaking, disclosure of this information will prejudice Oshawa Power and interfere in future salary negotiations. This information could be reviewed by employees of Oshawa Power, or other utilities, to benchmark salaries. <p>Parties can obtain sufficient aggregate employee compensation information in Exhibit 4 of the cost of service application for the purposes of setting rates. This level of detail is not necessary for the OEB to decide the Application.¹</p>
4-VECC-170 e) Attachment 4-7 Contract Between Oshawa Power	<p><u>Presumptively Confidential</u></p> <p>The redacted information in the column “Bill Rate”, “Bill Type” and “Pricing Notes” is unit pricing and/or billing rates, including assumptions made in relation to same, of a third party for the services being offered. Oshawa Power understands from this vendor that this information is commercially sensitive</p>

¹ EB-2024-0022/EB-2024-0096, Essex Powerlines Corporation, Decision on Confidentiality, October 7, 2024

and 2825407 Ontario Inc. (Schedule C)	and confidential. Accordingly, this information is presumptively confidential in accordance with section 4 and Appendix B of the OEB Practice Direction.
6-SEC-192 Attachment 6-1 2024 Corporate Income Tax Return (PDF pg 98)	<u>Personal Information</u> The redacted information is personal information. Having compensation information and job title would allow the inference of compensation for an identifiable individual. Oshawa Power requests that this information remain redacted on the basis of personal information.
9-Staff / CCMBC / CCC-218 c) ERP Costs	<u>Presumptively Confidential</u> The redacted information in the table is confidential unit pricing and/or billing rates, including assumptions made in relation to same, of a third party for the establishment of an ERP cloud based solution. Oshawa Power understands from this vendor that this information is commercially sensitive and confidential. Accordingly, this information is presumptively confidential in accordance with section 4 and Appendix B of the OEB Practice Direction.

Please contact the undersigned with any questions.

Yours truly,

BORDEN LADNER GERVAIS LLP



Colm Boyle

CB/JV