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August 18, 2025

RESS & EMAIL

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Richard Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2024-0115: Application by Ottawa Hydro Limited (“Hydro Ottawa”) for Approval of 2026-2030 Electricity Distribution Rates (the “Application”) – Request for Confidential Treatment of Information filed in Interrogatory Request (“IR”) Responses

The applicant in the above-noted proceeding filed IR responses on August 12, 13, 14 and 18, 2025. Pursuant to the OEB’s *Practice Direction on Confidential Filings* (the “**Practice Direction**”), Hydro Ottawa hereby requests OEB approval to treat confidentially certain information and to redact certain information from the public record which is not relevant to the proceeding. As further detailed on pages two through six of this letter, the information that is subject to this request includes:

- Commercially sensitive third-party consultant information about its proprietary methodologies;
- Third party pricing information that can prejudice vendor’s commercial interests and/or interfere with Hydro Ottawa’s future negotiations;
- Information that Hydro Ottawa understands can compromise the physical security of Hydro One’s transmission system;
- Information that reveals Hydro Ottawa cyber security vulnerabilities; and
- Banking details and tax registration numbers which are not relevant to the proceeding.

The information identified in the table below has been redacted in the public version of the interrogatory responses filed with the OEB.

Appendix A contains a bookmarked compilation of excerpts of the unredacted (confidential) versions of the relevant documents, each of which is marked “confidential” and highlights the specific portions of the documents for which Hydro Ottawa requests confidential or non-relevant treatment. For ease of reference, in Appendix A, Hydro Ottawa used green highlights for non-relevant information it seeks to permanently redact from the OEB record, and yellow highlights for information for which it seeks confidential treatment.

IRR	Page Reference	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Attachment 2-SEC-40(A)	7-26	N	Commercially Sensitive and Proprietary Information: These documents contain proprietary information from Copperleaf Technologies Inc. (Copperleaf), including value model pseudocode, inputs and data formats. Public disclosure of this information could harm Copperleaf’s commercial interests and competitive position by revealing confidential and proprietary methodologies integral to its business (Practice Direction, Appendix A, Parts (i), (iv)).
Attachment 2-SEC-40(B)	10-11; 13-47	N	Previous Treatment: The OEB has previously redacted similar consultant information to prevent prejudice to commercial interests of third-party consultants. ¹
Attachment 2-Staff-69(A)	16-18	N	Third Party Pricing Estimates: The information consists of Hydro Ottawa’s detailed budget for various components of the Ottawa Distributed Energy Resource Accelerator (ODERA) project which will be completed by third-party vendors. The redacted information also includes internal labour (for Attachment A only) and material cost components of the budget that can be used to deduce the vendor pricing elements of the budget from the total project costs, as Hydro Ottawa is not seeking confidential treatment of the total costs. Hydro Ottawa is currently actively involved in carrying out procurements for various components of the ODERA project. Disclosing Hydro Ottawa’s detailed budget for each of these components will reveal Hydro Ottawa’s expected price for these services, which can compromise the vendor’ bids and Hydro Ottawa’s ability to negotiate

¹ EB-2023-0195, *Decision on Confidentiality and Procedural Order No. 8*, (September 26, 2024), page 9; EB-2019-0014, *Decision on Confidentiality* (July 24, 2019), page 2.

Attachment 2-Staff-69(B)	18	N	competitive pricing for the service in question. (Practice Direction, Appendix A, Part A(iii)).
Attachment 2-Staff-87(A)	1; 11; 14	N	<p>Physical Security: The confidential information consists of information contained in Connection Cost Recovery Agreements that identifies the location of specific assets, which based on information provided by Hydro One, Hydro Ottawa understands could be exploited by malicious actors and could adversely affect the safety and security of Hydro One's transmission facilities.</p> <p>Previous Treatment: Pursuant to Appendix A, Part (e) of the Practice Direction, the OEB has previously decided that similar information contained in Connection Costs Recovery Agreements afforded confidential treatment because it could be exploited by malicious actors and adversely affect Hydro One's transmission facilities.²</p> <p>Not-Relevant: The redacted information also consists of HST numbers as contained in Connection Costs Recovery Agreements with Hydro One. Pursuant to Part 11 of the Practice Direction, this information is not relevant because it will not provide any assistance to the OEB or intervenors in resolving any of the issues that are part of this proceeding. Hydro Ottawa submits that this information is analogous to Business Registration Numbers which the OEB has previously found not to be relevant information.</p>
Attachment 2-Staff-87(B)	2; 7-9; 11-12; 14; 22		
Attachment 2-Staff-87(D)	2; 4-5; 8; 13		
Attachment 2-Staff-87(E)	1-2; 13-14; 17; 20		
Attachment 2-Staff-87(F)	11		
Attachment 2-Staff-87(G)	10; 13		
Attachment 2-Staff-87(H)	1; 12		
Attachment 2-Staff-87(I)	2; 7-9; 12; 19		
Attachment 2-Staff-87(J)	1-2; 12-13		
Attachment 2-Staff-87(L)	2-4; 6-7		
Attachment 2-Staff-87(M)	2; 15		
Attachment 2-Staff-87(N)	1; 15		
Attachment 2-Staff-87(O)	1-2; 4-5		
Attachment 2-Staff-87(P)	2-3; 16		

² EB-2023-0195, *Decision on Confidentiality and Procedural Order No. 8*. (September 26, 2024), pages 10-11.

Attachment 2-Staff-87(AL)	2		
Attachment 2-Staff-122(A)	1-2		
Attachment 2-Staff-122(B)	18		
Attachment 2-Staff-122(C)	1-2		
Attachment 2-Staff-122(D)	1-2		
2-Staff-87(R)	1 (of each invoice)	N	<p>Not Relevant: The information consists of banking information as contained in invoices issued from Hydro One. Pursuant to Part 11 of the Practice Direction, this information is not relevant because it will not provide any assistance to the OEB or intervenors in resolving any of the issues that are part of this proceeding.</p> <p>Previous Treatment: Pursuant to Appendix A, Part (e) of the Practice Direction, the OEB has previously decided similar information contained in Hydro One invoices were not relevant.³</p>
2-Staff-87(Y)			
2-Staff-87(Z)			
2-Staff-87(AC)			
2-Staff-87(AE)			
2-Staff-87(AI)			
2-Staff-87(AK)			
2-Staff-87(AN)			
2-Staff-87(AO)			
2-Staff-87(AP)			
2-Staff-87(AQ)			
2-Staff-87(AR)			
2-Staff-87(AS)			
2-Staff-87(X)	1-2		

³ EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8. (September 26, 2024), p.4.

Attachment 6-Staff-184(A)	Top right corner of pages 1-45 and 70-184; 1; 6; 11; 15; 18; 23; 27-28; 32; 42-44; 46-72; 74; 88; 96; 98; 100; 102; 105; 115; 122-123; 125-128; 131; 138; 144; 148-149; 156-157; 163; 165; 172; 178-180; 182-183	N	<p>Not Relevant: The information consists of (i) registered business numbers of Hydro Ottawa and third parties, (ii) employee names and history of employment and education, and (iii) unique apprentice contract identifiers, as contained in Hydro Ottawa's corporate income tax returns. Pursuant to Part 11 of the Practice Direction, this information is not relevant because it will not provide any assistance to the OEB or intervenors in resolving any of the issues that are part of this proceeding.</p> <p>Previous Treatment: Pursuant to Appendix A, Part (e) of the Practice Direction, the OEB has previously decided in this proceeding that registered business numbers and employee names and history of employment and education are not relevant.⁴ This treatment is consistent with previous OEB decisions where the OEB held that, in addition to being not relevant, this information could expose the utility to the risk of fraud and other malicious acts.⁵</p>
	8-10; 12-14; 16-18; 20-22; 24-26	N	<p>Sensitive Cybersecurity Information: The information describes technical measures that Hydro Ottawa is adopting to enhance its cyber security. The disclosure of this information could adversely impact the safety and security of the distribution system, including related assets and facilities. More specifically, the information identifies vulnerabilities and configuration architecture of cyber infrastructure that can be exploited by malicious actors to harm Hydro Ottawa (Practice Direction, Appendix A, Part C). If disclosed publicly, this information could be exploited by malicious actors which could adversely affect the safety and security of the distribution system.</p>

⁴ EB-2024-0115, Decision and Order, Decision on Confidentiality and Issues List, page 4.

⁵ EB 2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality, Issues List, Proposed Expert Evidence and Procedural Order No. 3 (February 5, 2024), page 3.

4.0-VECC-39 part (b)	2	Y	Third Party Pricing Information: The information consists of insurance premiums that have been and are expected to be paid to the MEARIE Group. This information consists of unit pricing for insurance coverage, which is presumptively confidential (Practice Direction, Appendix B, Part 1). Pursuant to Appendix A, Part (a)(i) and (iii), Hydro Ottawa is advised that disclosing this information on the public record could prejudice the MEARIE Group's competitive position in terms of providing similar insurance services to other potential clients.
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Yours Truly,

A handwritten signature in black ink that reads "D. Coban". The signature is written in a cursive style with a large, stylized "D" and "C".

Daliana Coban

cc:
April Barrie, *Hydro Ottawa Limited*

Appendix “A”

(Intentionally omitted from public version)