



Ontario
Energy
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de l'énergie
de l'Ontario

BY EMAIL

October 20, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ritchie Murray:

**Re: Ontario Energy Board (OEB) Staff Submission
Hydro Ottawa Limited (Hydro Ottawa)
2026-2030 Custom Rate Application for Electricity Distribution Rates and
Charges
OEB File Number: EB-2024-0115**

Please find attached OEB staff's submission in the above referenced proceeding, pursuant to the OEB's Practice Direction on Confidential Filings, Section 5.1.6.

Yours truly,

Narisa Jotiban
Senior Advisor, Electricity Distribution

Encl.

cc: All parties in EB-2024-0115



ONTARIO ENERGY BOARD

OEB Staff Submission on Confidentiality

Hydro Ottawa Limited

2026-2030 Electricity Distribution Rates

EB-2024-0115

October 20, 2025

Introduction

Hydro Ottawa Limited (Hydro Ottawa) filed a custom incentive rate-setting application with the Ontario Energy Board (OEB) on April 15, 2025, under section 78 of the *Ontario Energy Board Act, 1998*, seeking approval for changes to the rates that it charges for electricity distribution, beginning January 1, 2026 (Application).

As part of its undertaking responses, Hydro Ottawa filed a letter to the OEB dated October 6, 2025¹ requesting confidential treatment for specific information. On October 8, 2025 and October 10, 2025, Hydro Ottawa filed further letters to the OEB requesting to redact additional information.² Redacted versions of the interrogatory responses were filed on the public record of this proceeding and un-redacted versions of the documents were filed confidentially with the OEB pursuant to the OEB's *Practice Direction on Confidential Filings* (Practice Direction).³

Hydro Ottawa's letters each provide a table that includes references, general descriptions of the information and rationale for the requested redactions for portions of the following undertaking responses.

October 6, 2025, Letter

- JT1.26
- JT1.27
- JT1.31
- JT1.32
- JT2.14
- Attachments JT2.21 (A), (B), (C), (D), and (E)
- Attachment JT3.11(A), (B), and (C)

October 8, 2025, Letter

- JT1.31
- JT1.32
- JT3.15(B), (C), and (D)

October 10, 2025, Letter

- Updated JT1.31
- Attachments UT1.31(A) and (B)

¹ EB-2024-0115, [Letter to OEB](#) dated October 6, 2025

² EB-2024-0115, [Letter to OEB](#) dated October 8, 2025 and [Letter to OEB](#) dated October 10, 2025

³ Ontario Energy Board, [Practice Direction on Confidential Filings](#), December 17, 2021

OEB Staff Submission

OEB staff submits that it has no concerns with Hydro Ottawa's proposed redactions, except for those contained in Attachments JT3.15 (B) and (C).

In its letter dated October 8, 2025, Hydro Ottawa provided an explanation and rationale for requesting a confidential treatment of certain information included in Attachments JT3.15 (B) and (C), stating that "the redacted information is commercially sensitive as it reflects proprietary analysis and methodologies that are treated in a confidential manner. The public disclosure would prejudice Hatch's commercial interests and competitive position, and undermine its ability to carry on business offering such analysis".

OEB staff disagrees with the following proposed redactions in Attachment JT3.15 (B) since they contain general descriptions or steps and do not appear to contain commercially sensitive data:

- Page 6 – Risk level descriptions
- Pages 10 to 17 – Descriptions under the charts
- Pages 19-26, 28-30, 32-36, 40-43, 45-46, 48-53, 55-66, 68-72, 74, 78-82 – Steps

Further, OEB staff does not support the redactions in Attachments JT3.15 (B) and (C) listed below, as they do not appear to contain commercially sensitive information. The proposed redactions seem to relate to information that is of a high level, general nature, and it is not clear to OEB staff why this information would be considered commercially sensitive.

Attachment JT3.15 (B):

- Page 5 – Tool – Grid Modernization Maturity Matrix
- Page 5 – Execution Methodology
- Page 6 – Initiative Implementation Procedure
- Page 7 – Roadmap Design Principles
- Page 9 – Grid Modernization Maturity Assessment Model

Attachment JT3.15 (C):

- Page 8 – Performance-Based Grid Modernization Model

OEB staff invites Hydro Ottawa to provide further detailed explanations, in its reply submission, on how disclosure of each of the items listed above would prejudice Hatch's commercial interests and competitive position.

OEB staff notes that the October 8, 2025 letter contains incorrect information related to the undertaking response for JT1.31 and Updated JT1.31. The letter states that the

gross costs for the Greenbank MTS upgrade have been redacted; however, OEB staff notes that Table B in the undertaking response for JT1.31 and Updated JT1.31 response shows that all the gross costs for the Greenbank MTS upgrade have been redacted except for the gross cost for the Distribution Capacity Upgrade.

The October 8, 2025 letter also states that the gross costs for Cyrville MTS have not been redacted. OEB staff notes that Table A in the undertaking response for JT1.31 and Updated JT1.31 shows that all the gross costs for Cyrville MTS have, in fact, been redacted.

Lastly, Hydro Ottawa's letter dated October 6, 2025, provides a table with explanations for proposed redactions. However, OEB staff notes that the "Explanations and Rationale" column for the redactions in Attachments JT3.11(A), (B), and (C) contains multiple reasons that are not specific to each redaction. Upon review, OEB staff agrees that at least one of the listed reasons applies to each redaction.

~All of which is respectfully submitted~