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October 27, 2025  
Mr. Ritchie Murray, Acting Registrar  
Ontario Energy Board  
PO Box 2319  
2300 Yonge Street, 27th floor  
Toronto, ON M4P 1E4

**Re: OEB File No. EB-2025-0252, Alectra Utilities Corporation (“Alectra Utilities”) 2027-2031 Custom Rate Application for Electricity Distribution Rates and Charges (the “Application”) – Updated Request for Confidential Treatment**

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Dear Mr. Murray,

In response to the OEB’s completeness review, which concluded on October 22, 2025, Alectra Utilities is filing this Updated Request for Confidential Treatment (the “Responsive Documents”), which includes:

- An unredacted (confidential) version of DSP Appendix C (Alectra Utilities Value Framework Definition Document),
- An unredacted (confidential) version of Exhibit 6, Tab 3, Schedule 1 (Scientific Research and Experimental Development (SR&ED) Expenditures Claim), and
- An updated Table of Confidentiality Requests (attached as Appendix B to this cover letter), inclusive of any new redactions contained within the Responsive Documents.

Alectra Utilities has additionally filed its 2024 Actuarial Report as a Responsive Document to this update, with proposed redactions for non-relevance. The OEB’s completeness review noted that Alectra Utilities filed a redacted version of the Copperleaf Value Framework Assurance Review without its associated unredacted (confidential) equivalent. Alectra Utilities confirms the redacted copy was filed in error. The document does not require any confidential treatment and thus will not appear in the table below. The unredacted (public) copy to be placed on the public record is included as Appendix D of the updated DSP filed in “Alectra\_Exhibit 2A\_Distribution System Plan\_Part 3 of 5\_20251027”.

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

Sincerely,

A handwritten signature in cursive script that reads "Christine E. Long".

Christine E. Long, Vice President Regulatory Affairs & Privacy Officer

*Cc: Charles Keizer and Arlen Sternberg, Torys LLP; all intervenors*

## Table of Confidentiality Requests

Exhibit	Pages	Presumptively Confidential (Y/N)	Rationale for Request
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan Chapter 5	p.259	No	<i>Appendix A, Part C</i>  <b>Security Risk:</b>  Pursuant to the Practice Direction, Appendix A, Item (c), certain information relates to existing security vulnerabilities at specific Alectra Utilities properties. The information could be used to infer high-risk areas of attack, including tangible risks to critical security infrastructure therein. If disclosed publicly, this information could be exploited by malicious actors and could adversely affect the safety and security of the distribution system.
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan Appendix B04	p.161-162 p.180		
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan Appendix B07	p.277-278 p.282-283 p.286		
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan Appendix B12	p.461		<b>Previous Treatment:</b>  Pursuant to the Practice Direction, Part E, Alectra Utilities notes that in EB-2023-0195 <sup>1</sup> , the Ontario Energy Board (“OEB” or “Board”) accepted that it is appropriate to grant confidential treatment to safety and security information, including the location and vulnerabilities of critical infrastructure to the extent that its disclosure could adversely impact
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan	p.3 p.6-7		

<sup>1</sup> EB-2023-0195, Decision on Confidentiality, Issues List, and Proposed Expert Evidence and Procedural Order No. 3 (February 5, 2024), pp, 4-6.

Appendix O: Report for Electrical Services and Generator Capacities and Current Demand			the safety and security of the distribution system.
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan Appendix B09	p.346-347 p.362 p.363 p.367 p.369-370 p.374 p.379 p.380 p.386 p.388	No	<i>Appendix A, Part C</i>  <b>Cybersecurity Risk:</b>  The indicated pages contain sensitive cybersecurity information such as system design architecture maps, specific cybersecurity protocols used to protect key infrastructure, and risk and maturity assessments which indicate bottlenecks and other deficiencies for data breaches and other cyber-attacks. The information also pertains to the cyber security tools Alectra Utilities currently employs to protect its network, including deficiencies in respect of those tools, and firewall specifics that could increase the likelihood of a data breach if publicly disclosed.
Exhibit 2A Tab 1 Schedule 1  Distribution System Plan Appendix B14	p.582-583		
Exhibit 4 Tab 2 Schedule 8 Attachment 4-5  Enterprise IT Spending and Staffing Benchmark & Functional Maturity Assessment (Gartner Report)	p.4 p.8 p.41-43 p.63-65 p.67 p.78-82		
Exhibit 2A Tab 1 Schedule 1	p.27-28 p.30-34 p.36-46	No	<i>Appendix A, Parts A(i), (ii) and (iv) and B</i>

<p>Distribution System Plan  Appendix C: Alectra Utilities  Value Framework  Definition Document</p>	<p>p.48-57  p.59-60  p.62-63  p.65-71  p.75-79  p.81-85  p.87  p.91  p.93</p>		<p><b>Third-party Proprietary Information that is Commercially Sensitive:</b></p> <p>The redacted information consists of a third party’s technical material with respect to the Copperleaf optimization tools, such as the configurable fields in their proprietary user interface, or the calculations used to arrive at the resulting Value Measures. Alectra Utilities has been advised by the third-party author of this document, Copperleaf Technologies, that the redacted information is commercially sensitive as it reflects proprietary technology that consists of trade secrets. The public disclosure of this information would prejudice Copperleaf Technology’s commercial interests and competitive position and undermine its ability to carry on offering business services. Alectra Utilities further notes that Copperleaf Technology provided Alectra with the relevant information on the basis that it be treated confidentiality.</p>
<p>Exhibit 6  Tab 3  Schedule 1</p>	<p>All Pages</p>	<p><i>Yes – Appendix B, Part 11</i></p> <p><b>Not Relevant:</b></p> <p>The information consists of Registered business numbers of</p>	<p>N/A</p>

Alectra T2 Corporation Income Tax Return & SR&ED Form		Alectra Utilities and third parties as well as names, phone numbers, job titles, qualifications of Alectra Utilities employees, contained in Alectra Utilities' corporate income tax returns. The information also includes specifications of charitable donations; 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. Non-relevant	
Exhibit 6 Attachment 6-8  Fiscal Year-end 2024 IAS 19 OPRB Cost and Disclosure Information (2024 Actuarial Report)	p.12-13 p.26-27	<p><b>Previous Treatment:</b></p> Pursuant to Appendix A, Part E of the Practice Direction, the OEB has previously decided that this information is not relevant in the context of corporate tax returns and could expose the utility to the risk of fraud and other malicious acts. <sup>2</sup>	

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<sup>2</sup> EB-2023-0195, Decision on Confidentiality, Issues List, and Proposed Expert Evidence and Procedural Order No. 3 (February 5, 2024), p. 3-4.