

Christine Long, Vice President, Regulatory Affairs
Alectra Utilities Corporation
2185 Derry Road West | Mississauga, Ontario, L5N 7A6
Visit us at: www.alectrautilities.com
Email: regulatoryaffairs@alecrautilities.com



November 24, 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

Dear Mr. Murray,

Alectra Utilities writes pursuant to Rule 10.01 of the OEB’s *Rules of Practice and Procedure* and the OEB’s *Practice Direction on Confidential Filings* (the “Practice Direction”) to request that certain information contained in documents being produced as part of the utility’s rebasing application be held confidential. Alectra previously filed an earlier version of its confidentiality submission, which has since been removed from the record and revised to correct clerical errors through the OEB’s Completeness and Error Checking processes.

In accordance with section 12 of the Practice Direction, Alectra Utilities is providing a Table of Confidentiality as Appendix B to this letter, which describes all information for which Alectra Utilities is requesting confidential treatment for, and outlines the basis for each of the requests, including the reasons that public disclosure would be detrimental to Alectra Utilities, or others. For each of the documents flagged for confidential treatment, Alectra Utilities has followed the required approach of filing both redacted (public) and non-redacted (confidential) versions. In the non-redacted (confidential) versions, confidential information is highlighted yellow or marked for redaction with a red box, and non-relevant information is highlighted blue or marked for redaction with a blue box. With respect to the inclusion of personal information as defined in the *Freedom of Information and Protection of Privacy Act* (“FIPPA”), in accordance with section 12 of the Practice Direction, Alectra Utilities confirms that none of its submissions contain personal information, and as such, no redactions have been made in that regard.

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> Security Risk: 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 p.282-283 p.286		
Exhibit 2A Tab 1 Schedule 1 Distribution System Plan Appendix B12	p.461		Previous Treatment: Pursuant to the Practice Direction, Part E, Alectra Utilities notes that in EB-2023-0195 ¹ , 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		

¹ 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.362-363 p.367 p.369-370 p.374 p.379 p.380 p.386 p.388	No	<i>Appendix A, Part C</i> Cybersecurity Risk: 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 p.48-57	No	<i>Appendix A, Parts A(i),(ii) and (iv) and B</i>

Distribution System Plan Appendix C: Alectra Utilities Value Framework Definition Document	p.59-60 p.62-63 p.65-71 p.75-79 p.81-85 p.87 p.91 p.93		<p>Third-party Proprietary Information that is Commercially Sensitive:</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>
Exhibit 6 Tab 3 Schedule 1	All Pages	Yes – <i>Appendix B, Part 11</i> Not Relevant: The information consists of Registered business numbers of	N/A

<p>Alectra T2 Corporation Income Tax Return & SR&ED Form</p>		<p>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</p> <p>Previous Treatment:</p> <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.²</p>	
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² EB-2023-0195, Decision on Confidentiality, Issues List, and Proposed Expert Evidence and Procedural Order No. 3 (February 5, 2024), p. 3-4.