



Ontario | Commission
Energy | de l'énergie
Board | de l'Ontario

BY EMAIL

December 19, 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
Alectra Utilities Corporation (Alectra Utilities)
2027-2031 Custom Rate Application for Electricity Distribution Rates and
Charges
OEB File Number: EB-2025-0252**

Please find attached OEB staff's submission in the above referenced proceeding, pursuant to Procedural Order No. 1.

Yours truly,

Arlene Bernardo
Analyst, Electricity Distribution

Encl.

cc: All parties in EB-2025-0252



ONTARIO ENERGY BOARD

OEB Staff Submission on Confidentiality

Alectra Utilities Corporation

2027-2031 Electricity Distribution Rates

EB-2025-0252

December 19, 2025

Introduction

Alectra Utilities Corporation (Alectra Utilities) filed a custom incentive rate-setting application with the Ontario Energy Board (OEB) on October 14, 2025 under section 78 of the *Ontario Energy Board Act, 1998*, seeking approval for changes to the rates that charges for electricity distribution, beginning January 1, 2027 (the Application).

As part of its Application, Alectra Utilities filed a letter to the OEB dated October 14, 2025¹ requesting confidential treatment for specific information pursuant to the OEB's *Practice Direction on Confidential Filings* (Practice Direction)² and updated its request for confidential treatment on October 27, 2025³ and November 24, 2025.⁴

Alectra Utilities' letter dated November 24, 2025 (the letter) provides updated confidentiality requests, along with references, general descriptions and rationale for proposed redactions of certain categories of information contained in the documents below:

1. Information relates to existing security vulnerabilities at specific Alectra Utilities properties
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Chapter 5, page 259
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B04, pages 161-162 and 180
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B07, pages 277, 282-283, and 286
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B12, page 461
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix O, pages 3 and 6-7
2. Cybersecurity Information
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, pages 346-347, 362-363, 367, 369-370, 374, 379, 380, 386, 388
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B14, pages 582-583

¹ EB-2025-0252, [Letter to OEB](#), October 14, 2025

² Ontario Energy Board, [Practice Direction on Confidential Filings](#), December 17, 2021

³ EB-2025-0252, [Letter to OEB](#), October 27, 2025

⁴ EB-2025-0252, [Letter to the OEB](#), November 24, 2025

- Exhibit 4, Tab 2, Schedule 8, Attachment 4-5, pages 4, 8, 41-43, 63-65, 67, 78-82
3. Third-party proprietary information
 - Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix C, pages 27-28, 30-34, 36-46, 48-57, 59-60, 62-63, 65-71, 75-79, 81-85, 87, 91, 93
 4. Registered business numbers and information contained in the following documents:
 - Exhibit 6, Tab 2, Schedule 1, T2 Corporation Income Tax Return and Scientific Research and Experimental Development (SR&ED) Form, all pages

OEB staff notes that in Alectra Utilities' updated filing on November 24, 2025, it referenced Exhibit 6, Tab 3, Schedule 1, T2 Corporation Income Tax Return and SR&ED Form (in both the bookmark and the table). Upon review of Exhibit 6, OEB staff observes that this document is actually located under Tab 2. For clarity, OEB staff will refer to the document, T2 Corporation Income Tax Return and SR&ED Form, as Tab 2 in accordance with the updated Exhibit 6.

OEB Staff Submission

The OEB staff's submission in this section is based on Alectra Utilities' updated confidentiality request in the letter dated November 24, 2025.

OEB staff supports Alectra Utilities' confidentiality request and agrees with its rationale for the proposed redactions, as listed below:

- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B04, pages 161-162, and 180
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B07, pages 277 (lines 10-14 and 16-22), 282-283, and 286
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, pages 346-347, 362 ("Project Code(s)" column only), 363, 367, 369-370, 374, 379, and 388 (lines 9-11)
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B12, page 461
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B14, pages 582-583

- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix C - all pages identified in the letter, except for the proposed redactions in the “Measure Description” sections
- Exhibit 6, Tab 2, Schedule 1, Alectra T2 Corporation Income Tax Return and SR&ED Form - all pages identified in the letter

OEB staff notes that the “Rationale for Request” column (in the letter) related to security and cybersecurity risk information contains multiple reasons that are not specific to each redaction. OEB staff agrees that at least one of the multiple reasons listed does apply to each redaction. For ease of review, OEB staff encourages Alectra Utilities to identify the specific reason for each redaction in future filings.

OEB staff does not support certain redactions, which are explained below.

Information related to existing security vulnerabilities at specific Alectra Utilities properties

Alectra Utilities requests confidential treatment for this category under Appendix A(c) of the OEB’s Practice Direction. Alectra Utilities states that the redacted information reveals security vulnerabilities at its specific properties which, if disclosed publicly, could be used to identify potential areas of attack and exploited maliciously by parties that could adversely affect the safety and security of the distribution system. Alectra Utilities also provides a reference for the EB-2023-0195⁵ proceeding whereby the OEB granted confidential treatment for information that could adversely impact the safety and security of the distribution system.

OEB staff does not support the following redactions since they appear to be high-level and general in nature. In addition, OEB staff does not agree with Alectra Utilities’ rationale that if the information is publicly disclosed, it could be maliciously exploited and adversely affect the safety and security of Alectra Utilities’ distribution system.

- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Chapter 5, page 259 – OEB staff submits the redacted information does not reveal an identifiable location of Alectra Utilities’ distribution system.
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B07, page 277– OEB staff does not support the redactions in lines 25-26 of page 277, which discuss general benefits of security upgrade.
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix O, pages 3 and 6-7 – OEB staff submits that these redactions are unnecessary since the

⁵ EB-2023-0195, [Decision on Confidentiality, Issues List, and Proposed Expert Evidence and Procedural Order No. 3](#), February 5, 2024

redacted information can be deduced with the information made publicly available in other parts of the documents.

Cybersecurity Information

Alectra Utilities seeks confidential treatment for certain cybersecurity-related information under Appendix A(c) of the Practice Direction.⁶ Alectra Utilities states that redacted information contains Alectra Utilities' system design architecture maps, identified deficiencies, risks and maturity assessments, and specific cybersecurity protocols and measures. In addition, public disclosure of this information could increase the likelihood of data breaches and cyberattacks.

OEB staff does not agree with the following redactions, which are based on Alectra Utilities' rationale that, if publicly disclosed, could expose Alectra Utilities to cybersecurity attacks:

- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, page 362 – OEB staff notes that, in the redacted version of the document, Alectra Utilities redacted the entire Table B09 – 9 IT Security Investments which contains information related to project codes, security investments and total costs for 2027-2031. However, only the “Project Code(s)” column is marked for redaction with a red box in the unredacted version of the document. OEB staff is of the view that the redacted information in the “IT Security Investments” and “Total 2027-2031 (\$MM)” columns contains high-level project information and do not reveal sensitive information. OEB staff invites Alectra Utilities to clarify whether the redactions in these two columns were made in error. If not, OEB staff invites Alectra Utilities to provide further explanations as to why this information should warrant confidential treatment.
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, page 380 – OEB staff submits that the redacted information reveals general initiatives taken by Alectra Utilities against cybersecurity threats.
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, page 386 – OEB staff submits the redacted information discusses general risks associated with outdated cybersecurity devices and governance tools.
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, page 388 – OEB staff does not agree that lines 12-14 warrants confidential treatment when it merely describes general benefits of cloud-based solutions.
- Exhibit 4, Tab 2, Schedule 8, Attachment 4-5, pages 4, 8, 41-43, 63-65, 67, 78-82 – OEB staff is unclear how public disclosure of Alectra Utilities' IT maturity

⁶ Ontario Energy Board, [Practice Direction on Confidential Filings](#), December 17, 2021, Appendix A(c), states that the OEB may consider addressing confidentiality findings if the information pertains to public security or cybersecurity.

assessment, along with general areas of improvement and activities of different IT functions, which do not reveal specific cybersecurity protocols or system design architecture could result in data breaches and cyberattacks. Moreover, similar information was made publicly available in EB-2023-0195⁷ from the same third-party provider. OEB staff invites Alectra Utilities to provide further explanations as to why this should warrant confidential treatment.

OEB staff notes that the letter does not include the redactions in Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, page 345, line 16, which refers to the caption of figure containing the redacted information on page 346. OEB staff believes that the redaction is an error and requests Alectra Utilities to confirm OEB staff's observation.

OEB staff also notes that Exhibit 2A, Distribution System Plan, Appendix B09 contains several tables (such as those found in pages 344, 350, 356, 359, and 364) which show project codes, types of investment for the project, and project cost. However, only the IT security investments, project codes, and project costs for the test years on page 362 were redacted, while information related to other types of investment was not redacted. It appears that only information related to IT security investments, projects codes, and project costs for the test years was redacted since it contains sensitive cybersecurity risks, whereas other investments do not contain sensitive information. OEB staff invites Alectra Utilities to confirm OEB staff's understanding.

Third-Party Proprietary Information

Alectra Utilities requests confidential treatment for certain information in Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix C which is a document prepared by its third-party provider, Copperleaf Technologies Inc. (Copperleaf Technologies). Alectra Utilities states that the document contains information related to proprietary user interface and calculations included in the technical document, based on Appendix A Parts A(i), (ii), and (iv) and Part B of the Practice Direction⁸.

Alectra Utilities further states that it has been advised by Copperleaf Technologies that the redacted information are commercially sensitive proprietary trade secrets that could prejudice Copperleaf Technologies' commercial interest and competitive position if disclosed publicly. Moreover, Alectra Utilities further notes that Copperleaf Technologies provided Alectra Utilities with the relevant information on the basis that it be treated confidentiality.

OEB staff supports Alectra Utilities' proposed redactions based on Alectra Utilities'

⁷ EB-2023-0195, [Exhibit 2B](#), Section D8, Appendix A, November 17, 2024

⁸ Ontario Energy Board, [Practice Direction on Confidential Filings](#), December 17, 2021, Appendix A

rationale, except for the redactions in the “Measure Description” sections (which appear throughout the document) since these redactions do not contain any methodologies or calculations. OEB staff believes that the redacted information contained in “Measure Description” sections merely defines the parameters and variables being measured and how it is being measured, which does not reveal commercially sensitive proprietary information that could negatively impact Copperleaf Technologies’ commercial interest and competitive position. Furthermore, the “Measure Description” information from a report by Copperleaf Technologies was made publicly available in a previous proceeding.⁹

Registered Business Numbers and Information Contained in Corporation Income Tax Return SR&ED Form

Alectra Utilities argues that the proposed redactions in T2 Corporation Income Tax Return and SR&ED Form in Exhibit 6, Tab 2, Schedule 1 (which include registered business numbers of Alectra Utilities and third parties, as well as names, phone numbers, job titles, employee qualifications, and charitable donations) are presumptively confidential under Appendix B, part 11 of the Practice Direction, which states that “information identified in the OEB’s Reporting and Record Keeping Requirements (RRR) as being confidential.”¹⁰ Alectra Utilities also provides a reference for the EB-2023-0195 proceeding whereby the OEB found business information in corporate income tax returns as not relevant and commercially sensitive.¹¹

OEB staff agrees that the redacted information in T2 Corporation Income Tax Return and SR&ED Form is irrelevant to the proceeding and therefore supports the redactions. However, OEB staff disagrees that the proposed redactions are presumptively confidential under Appendix B, part 11 since they do not fall within the categories specified in the RRR requirements.¹²

~All of which is respectfully submitted~

⁹ EB-2024-0115, 2-SEC-40 [Interrogatory Response](#), Attachment B, August 14, 2025

¹⁰ Ontario Energy Board, [Practice Direction on Confidential Filings](#), December 17, 2021, Appendix B

¹¹ EB-2023-0195, [Decision on Confidentiality, Issues List, and Proposed Expert Evidence and Procedural Order No. 3](#), February 5, 2024

¹² [Electricity Reporting & Record Keeping Requirements](#), March 14, 2025, page 5