

January 9, 2026

**RESS & EMAIL**

Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

Attention: Richie Murray, Acting Registrar

Dear Mr. Ritchie:

**Re: EB-2025-0252: Alectra Utilities Corporation (“Alectra Utilities”) 2027-2031 Custom Rate Application for Electricity Distribution Rates and Charges – Confidentiality Request Reply Submission**

On October 14, 2025, Alectra Utilities filed a custom rate application for electricity distribution rates and charges for the 2027-2031 period (the “Application”) with the Ontario Energy Board (OEB). Included in the Application were requests for confidential treatment of certain materials, pursuant to the OEB’s *Practice Direction on Confidential Filings* (the “Practice Direction”). Alectra Utilities updated its requests for confidential treatment on October 27, 2025 and November 24, 2025.

The requests for confidential treatment were for selected portions of evidence relating to the following issues:

1. Information relating to existing security vulnerabilities at specific Alectra Utilities properties;
2. Sensitive cybersecurity information;
3. Third-party proprietary information that is commercially sensitive; and
4. Registered business numbers and information contained in Corporation Income Tax Return and SR&ED Form that are irrelevant to the proceeding.

The OEB issued Procedural Order #1 on December 12, 2025. OEB Staff filed a submission regarding Alectra Utilities’ confidentiality requests on December 19, 2025. In its submission, OEB Staff supported many of Alectra Utilities’ confidentiality requests, including the entirety of the information redacted in the Corporation Income Tax Return and SR&ED Form. With respect to those requests that OEB Staff did challenge, Alectra Utilities provides its reply submissions regarding its confidentiality requests in the sections that follow.

**1. Information Relating to Existing Security Vulnerabilities at Specific Alectra Utilities Properties**

OEB Staff made submissions with respect to Alectra Utilities’ request for the confidential treatment of information related to existing security vulnerabilities at specific Alectra Utilities properties. Specifically, OEB Staff provided the following list of redactions that it has assessed to be high-level and general in nature:

- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, page 259 (Figure 5.3.3-2)
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B07, page 277 (lines 25-26)
- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix O, pages 3 and 6-7

Having reviewed OEB Staff's comments, Alectra Utilities agrees that the above listed redactions may be removed.

## **2. Sensitive Cybersecurity Information**

OEB Staff also made submissions with respect to Alectra Utilities' redaction of materials containing sensitive cybersecurity information. OEB Staff agreed that many of these redactions are appropriate, but there were some redactions that OEB Staff challenged.

Having reviewed OEB Staff's comments, Alectra Utilities agrees that the following redactions may be removed:

- Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, pages 380, 386, and 388 (lines 12-14)
- Exhibit 4, Tab 2, Schedule 8, Attachment 4-5 (the "Gartner IT Report"), pages 4, 8, 41-43, 63-65, 67, and 78-82

Generally, Alectra Utilities continues to be cautious about the cybersecurity risks presented by the public disclosure of sensitive information in its Application. However, after review of OEB Staff's comments and on further review of the proposed redactions to the Gartner IT Report, Alectra Utilities agrees to remove all of its proposed redactions to the Gartner IT Report without creating a material cybersecurity risk, with the view of maintaining an open and transparent record.

In addition, OEB Staff correctly noted that Alectra Utilities accidentally redacted an item in Exhibit 2A, Tab 1, Schedule 1, Appendix B09, page 345, line 16 in its submissions. Alectra Utilities thanks OEB Staff for pointing out the error and will remove the redaction from its submission.

Finally, in regard to OEB Staff's comments regarding Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix B09, page 362, Table B09 – 9, Alectra Utilities notes that in the public filing of this exhibit, Alectra Utilities redacted the "IT Security Investments" and "Total 2027-2031 (\$MM)" columns in error. Alectra Utilities will update the public record to align with the redactions in this submission and thanks OEB Staff for noting this issue. For further clarification, in respect of the "Project Codes" column in Table B09 – 9, Alectra Utilities maintains that certain redactions should remain as the material contains sensitive cybersecurity information regarding the utility's system design architecture that could increase the likelihood of a data breach if publicly disclosed (Practice Direction, Appendix A, Part C). Specifically, only the second project name should remain redacted. The project name in question describes planned enhancements to specific and identifiable aspects of Alectra Utilities' cybersecurity infrastructure. Therefore, if disclosed, this information reveals specific areas of vulnerability within Alectra Utilities' cybersecurity infrastructure, which could increase the likelihood of a security breach if exploited by a malicious

actor. For the avoidance of doubt, Alectra Utilities is no longer seeking confidential treatment for any of the project codes for the first or third project names in the table.<sup>1</sup>

### **3. Third-Party Proprietary Information that is Commercially Sensitive**

Finally, OEB Staff made submissions with respect to Alectra Utilities' request for confidential treatment of certain third-party proprietary and commercially sensitive information within Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix C. OEB Staff acknowledged that the majority of the redacted information should be given confidential treatment, with the exception of the "measure description sections" which OEB Staff assessed to not reveal commercially sensitive proprietary information.

Alectra Utilities has been advised by Copperleaf Technologies, which is the owner of the Value Framework Definition Document at issue, that the measure descriptions may be publicly disclosed. Alectra Utilities therefore accepts OEB Staff's position that the redactions can be removed from the measure descriptions in Appendix C.

Sincerely,

Christine E. Long  
SVP, Regulatory Affairs & Privacy Officer  
Alectra Utilities Corporation

cc: Charles Keizer and Daliana Coban, Torys LLP  
all intervenors

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<sup>1</sup> OEB Staff also noted in its submission that several other tables in the DSP that are similar to Table B09 – 9 and that show project codes, types of investment, and costs have not been redacted. OEB Staff correctly surmised that Alectra Utilities seeks confidential treatment of aspects of Table B09 – 9 because that table contains sensitive cybersecurity information, whereas the other tables do not.