

**Colm Boyle**  
T: 416-367-7273  
cboyle@blg.com

**John Vellone**  
T: 416-367-6730  
jvellone@blg.com

Borden Ladner Gervais LLP  
Bay Adelaide Centre, East Tower  
22 Adelaide Street West  
Toronto ON M5H 4E3  
Canada  
T 416-367-6000  
F 416-367-6749  
blg.com



**File No. 98736.12**

January 23, 2026

**DELIVERED BY EMAIL**

Mr. Ritchie Murray  
Ontario Energy Board  
2300 Yonge Street, 27th floor  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Mr. Murray,

**Re: Lakeland Power Distribution Ltd. (“LPDL”) – 2026 IRM Distribution Rate Application  
OEB File No. EB-2025-0024  
Interrogatory Responses**

On November 27, 2025, the Ontario Energy Board (“OEB”) issued Procedural Order No. 1 directing LPDL to file complete written responses to the interrogatories filed by interveners and OEB Staff by January 16, 2026. On January 16, 2026, LPDL filed a letter requesting an extension to file these interrogatory responses to January 23, 2026. Please find enclosed LPDL’s interrogatory responses.

The interrogatory responses include certain information that is confidential. LPDL is hereby requesting confidential treatment of the information in the table below pursuant to section 10.01 and 10.02 of the OEB’s Rules of Practice and Procedure (revised November 13, 2025) and sections 5.1.1 and 5.1.2 of the OEB’s Practice Direction on Confidential Filings (revised December 17, 2021, “Practice Direction”).

<b>Clarification Question Description</b>	<b>Rationale Supporting Redaction</b>
OEB Staff 7  Appendix A	<b><u>Emergency Preparedness Plan – Appendix 3B, 3D and 3E – Not Relevant</u></b>  <b><u>Emergency Preparedness Plan – Appendix 3A and 3C – Confidential / Not Relevant</u></b>  On May 1, 2024, in its Decision on Confidentiality (EB-2023-0013) regarding E.L.K. Energy Inc.’s request for confidential treatment of its emergency

	<p>response plan, the OEB confirmed that, consistent with the Practice Direction, parties are expected to file only information that is relevant to the proceeding.</p> <p>The OEB determined that Operating Agreements between utilities and mutual assistance plans were not relevant to its assessment of the issues in the electricity distribution rate application filed under the incentive rate-setting mechanism, and therefore were not necessary for its determination in that proceeding.</p> <p>The OEB also held in the E.L.K. Energy confidentiality decision that the specific information regarding infrastructure within E.L.K. Energy’s service area could affect the security of external parties, and should remain redacted.</p> <p>LPDL notes that E.L.K. Energy’s reply submission provided a good summary of the scope of other prior confidentiality decisions on emergency response plans, which will not be repeated here.<sup>1</sup> For the same reasons, LPDL is filing a portion of the emergency response plan and submits that Appendices 3A to 3E, in particular, are not relevant to the OEB’s assessment of the issues in this Application.</p> <p>Furthermore, LPDL submits that the maps included in Appendix 3A and 3C are confidential as disclosure could affect the security of the details of the emergency response plan.</p> <p><b><u>Emergency Preparedness Plan – Pages 11, 15 &amp; 21 – Confidential</u></b></p> <p>This section outlines specifically where the emergency control center will be located in the event of an emergency, in which order services will be restored to customers, and how urgent emergency response is required. With this information, a nefarious actor could target LPDL to severely disrupt its emergency response ability. LPDL submits this information should be kept confidential on the basis it pertains to public security or cybersecurity under section (c) of Appendix A of the Practice Direction.</p>
<p>OEB Staff 10(b)</p> <p>OEB Staff 14(h)</p> <p>Appendix B</p> <p>Appendix C</p> <p>Appendix D</p> <p>Appendix E</p>	<p><b><u>Unit Pricing / Billing Rates – Presumptively Confidential (All Appendices)</u></b></p> <p>LPDL submits that the pricing information in invoices and/or quotes from its third party contractors is presumptively confidential under sections 1 and 2 of Appendix B in the Practice Direction. LPDL has limited its redactions on the invoices narrowly to not disclose unit or billing rates from third party contractors as disclosure could prejudice their competitive position in the marketplace. Redactions have also been made so that unit pricing and billing rates cannot be back calculated or approximated from the total invoice amount.</p>

<sup>1</sup> Please see ELK Confidentiality Request Reply, EB-2023-0013, January 18, 2024, pg. 2

	<p>LPDL submits that any commercially sensitive information contained in the invoices and/or quotes should be treated as confidential. Commercially sensitive information beyond pricing could prejudice the third-party contractor, particularly by undermining its position in ongoing or future negotiations. Such information may include delivery dates, confidential technical specifications, warranty, payment terms, and interest.</p> <p><b><u>Quotations from Vendors – Confidential (Appendices B &amp; C)</u></b></p> <p>Many of the quotes regarding the replacement or repair of the transformer were supplied by vendors on the basis that the quote contains proprietary information and may not be disclosed without written permission from the vendor. LPDL did not receive written permission from any of the vendors in Appendix B or C to disclose the quotes and will be filing them confidentially in their entirety with the OEB.</p> <p>LPDL submits that the probative value of placing vendor quotations for goods or services supplied to an OEB-regulated utility on the public record is minimal. Under the <i>Practice Direction on Confidential Filings</i>, parties requesting confidentiality must demonstrate that disclosure could reasonably be expected to result in harm, including prejudice to a person’s competitive position or interference with contractual or other negotiations. Vendor invoices and quotations fall squarely within this category of commercially sensitive information. They often contain detailed pricing structures, rate methodologies, negotiated terms, delivery timelines, and other commercially sensitive information that is not publicly available in the competitive marketplace. LPDL expects, but did not confirm, that each vendor has varying pricing strategies and delivery commitments based on the volume of sales.</p> <p>Releasing such material would provide competitors with direct insight into the pricing strategies, commercial terms, and negotiation outcomes of the vendors serving LPDL. This not only risks distorting future procurement processes, by enabling bidders to tailor pricing based on knowledge of their competitors’ past bids, but also risks impairing the utility’s ability to obtain competitive pricing on behalf of customers. Public disclosure of vendor quotations acceptable to LPDL would signal to market participants the conditions under which a utility is prepared to contract, thereby eroding the very competitive tension the procurement process is designed to maintain.</p> <p>Accordingly, LPDL submits that any commercially sensitive information contained within invoices and/or quotations should be accorded confidential treatment.</p>
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Yours truly,

**BORDEN LADNER GERVAIS LLP**

A handwritten signature in black ink, appearing to read "Colm Boyle". The signature is written in a cursive, slightly slanted style.

Colm Boyle

CB/JV