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**RESS & EMAIL**

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

Attention: Richie Murray, Registrar

Dear Mr. Ritchie:

**Re: EB-2025-0312: Application by Elexicon Energy Inc. (“Elexicon”) for Approval of 2027-2031 Electricity Distribution Rates (the “Application”)– Request for Confidential Treatment of Information in Pre-Filed Evidence**

We are legal counsel to Elexicon, the applicant in the above-referenced proceeding. Elexicon filed the Application on December 19, 2025. Pursuant to the OEB’s *Practice Direction on Confidential Filings* (the “**Practice Direction**”), Elexicon hereby requests OEB approval to permanently redact from the public and/or treat confidentially certain information contained in the Application (the “**Confidential Information**”).

The Confidential Information, as further detailed on page two of this letter, includes:

- Non-relevant business numbers and employee information within corporate tax returns
- Labour sensitive forecast information
- Third-party pricing and commercially sensitive information
- Information that identifies physical and cyber security infrastructure vulnerabilities
- Information of a personal nature consistent the *Freedom of Information and Protection of Privacy Act*.

The Confidential Information has been redacted in the public version of the Application filed with the OEB. Appendix A contains a compilation of the unredacted (confidential) versions of the relevant documents, each of which is marked “Confidential” or “Confidential – Non-Relevant”, as appropriate, and highlights the specific portions of the documents for which Elexicon requests confidential treatment. For ease of reference, Elexicon used red highlights for personal information and blue highlights for non-relevant information, both of which Elexicon seeks to permanently redact from the OEB record. Information for which Elexicon seeks confidential treatment on the record has been highlighted green.

Exhibit Reference		Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Exhibit 1_Tab 5_Schedule 2 [Impacts of Inflation]	Page 23	Y	<p><b>Third Party Pricing Information:</b> The redacted information identifies Elexicon's price increases for specific construction and engineering contracts. This information is sensitive third party pricing information, which is presumed confidential under the Practice Direction, Appendix B, Parts 1 and 2.</p> <p>Public disclosure of this information may also compromise the company's ability to negotiate competitive pricing for these and similar services and could result in significant losses for Elexicon and its ratepayers, and undeserved gains for third parties who might otherwise increase their bid if they have access to this information. (Practice Direction, Appendix A, part (a)(iii) and (iv)).</p>
Exhibit 1_Tab 5_Schedule 2 [Impacts of Inflation]	Pages 1 and 23	Y	<p><b>Labour Sensitive Forecast Information:</b> The redacted information identifies the forecasted annual labour escalation rates, beyond the scope of the present collective agreement, that Elexicon has incorporated into its 2028-2030 compensation budgets for unionized employees. This information is sensitive from a labour relations perspective because it can impact future collective bargaining negotiations (Practice Direction, Appendix B, part 8 and Appendix A, part (a)(iii)).</p>
Exhibit 2B_Tab 1_Schedule 1 [DSP Overview]	Page 24	N	<p><b>Cyber Security Risk:</b> The redacted information describes technical details of Elexicon's IT and OT infrastructure including system design architecture, specific hardware components that make up Elexicon's IT system, the network that critical</p>

<b>Exhibit Reference</b>		<b>Presumptive Confidential Treatment (Y/N)</b>	<b>Explanation and Rationale</b>
Exhibit 2B_Tab 4_Schedule 3_Appendix L-1 [Cresa Report]	Page 13, 34-35, 57-58, 62 and 75		<p>infrastructure components are hosted on, specific software solutions used by Elexicon for key functions that house customer, employee and financial data, and specific cyber security protocols used to protect key infrastructure. The redacted information also provides information about measures related to cyber security enhancements and describes the identification and assessment of cyber security vulnerabilities, including those vulnerabilities that the security enhancements address. Finally, the information identifies the location of key aspects of Elexicon's technical infrastructure. Public disclosure of this information poses a cyber security risk as contemplated in the Practice Direction, Appendix A, part (c).</p>
Exhibit 2B_Tab 4_Schedule 3_Appendix N [IT Systems]	Pages 9-13		
Exhibit 2B_Tab 4_Schedule 3_Appendix P [OT Systems]	Pages 6, 20, 22, and 26		
Exhibit 4_Tab 1_Schedule 3 [System Operations]	Pages 3 and 12		
Exhibit 4_Tab 1_Schedule 6 [Common Corporate]	Pages 18-19, and 21		
Exhibit 4_Tab 1_Schedule 6_Appndex A [Dx NEXT Summary]	Pages 9-11, 20-21, and 23-24		
Exhibit 4_Tab 1_Schedule 6_Appendix A-1 [Dx NEXT Business Case]	Pages 11, 13, 19, 21-22, 30, and 33		

Exhibit Reference		Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Exhibit 6_Tab 2_Schedule 1_Attachment 2 [Tax Return]	Pages 10, 12-13, 21-22, and 24		
Exhibit 2B_Tab 4_Schedule 3_Appendix E [Substation Renewal]	Pages 43-45	N	<p><b>Physical Security Risk:</b> The redacted information provides the configuration of specific assets, including site maps and floorplans, identifies the location of certain types of assets particularly susceptible to theft, vandalism, or attack, and describes the security measures used to protect these assets. The redacted information also includes a discussion of security vulnerabilities, and the enhancements intended to address those vulnerabilities. Public disclosure of this information poses a physical security risk as contemplated in the Practice Direction, Appendix A, part (c).</p>
Exhibit 2B_Tab 4_Schedule 3_Appendix L [Facilities]	Pages 2-5, 11-12, 15, 17 and 22		
Exhibit 2B_Tab 4_Schedule 3_Appendix L-1 [Cresa Report]	Pages 9, 17, 22-33, 39-40, 48, 53, 58-59, 62-64, 69, 72 and 75		
Exhibit 4_Tab 1_Schedule 3 [System Operations]	Page 1		
Exhibit 4_Tab 1_Schedule 6 [Common Corporate]	Pages 5, and 39-41		
Exhibit 4_Tab 1_Schedule 1 [OM&A Overview]	Page 14	Y	
			<p><b>Personal Information:</b> The redacted information is of a personal nature consistent with section 2(1)(b) of the <i>Freedom of Information and Protection of Privacy Act</i>.</p>

Exhibit Reference		Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Exhibit 4_Tab 1_Schedule 6_Appendix A [Dx NEXT Summary]	Pages 12-14	Y	<b>Third Party Pricing Information:</b> The redacted information consists of a detailed breakdown of the vendor pricing structure for the Dx NEXT project. This information is presumed confidential under the Practice Direction, Appendix B, parts 1 and 2.
Exhibit 4_Tab 1_Schedule 6_Appendix A [Dx NEXT Business Case]	Pages 24-26		
Exhibit 4_Tab 1_Schedule 6_Appendix A [Dx NEXT Summary]	Page 15	N	<b>Third Party Commercially Sensitive Information:</b> The redacted information consists of pricing-related commercial terms for the software cost components of the Dx NEXT project. The vendor has advised Elexicon that publicly disclosing this information could prejudice the vendor's competitive position in providing similar software services to other potential clients, and can impair its ability to negotiate agreements with other customers. This information is commercially sensitive and if disclosed, could prejudice the competitive positions of the vendor, interfere with future negotiations and may produce a significant loss to the vendor. (Practice Direction, Appendix B, Parts 1 and 2; Practice Direction, Appendix A, parts (a)(i), (iii) and (iv)).
Exhibit 4_Tab 1_Schedule 6_Appendix A [Dx NEXT Business Case]	Pages 7, 23, 25- 26 and 32		

Exhibit Reference		Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Exhibit 6_Tab 2_Schedule 1_Attachment 2 [Tax Return] <i>Business Numbers</i>	Pages 1-141	N	<b>Not Relevant:</b> The redacted information consists of registered business numbers of Elexicon and third parties. This information is not relevant because it will not provide any assistance to the OEB or intervenors with respect to the issues in this proceeding.  <b>Previous Treatment:</b> 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. <sup>1</sup>
Exhibit 6_Tab 2_Schedule 1_Attachment 2 [Tax Return] <i>Employee Information</i>	Pages 1, 10, 14, 18, 23, 26, 29, 42, and 131-134	N	<b>Not Relevant:</b> The redacted information consists of names, post-secondary affiliation, job titles, qualifications, employment history and salary information attributable to specific Elexicon employees. This information is not relevant because it will not provide any assistance to the OEB or intervenors with respect to the issues in this proceeding.  <b>Previous Treatment:</b> 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 return. <sup>2</sup>

Yours Truly,



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cc: Erin Stevens, Stephen Vetsis, Elexicon Energy Inc

<sup>1</sup> EB 2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality, Issues List, Proposed Expert Evidence and Procedural Order No. 3 (February 5, 2024) at page 3.

<sup>2</sup> EB-2024-0115, Hydro Ottawa Limited, Decision on Confidentiality and Issues List (June 24, 2025) at pages 2-3.