

March 9, 2026

VIA RESS & EMAIL

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

Attention: Mr. Ritchie Murray, Acting Registrar

Dear Mr. Murray;

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

On February 20th, 2026, Alectra Utilities filed IRRs in respect of its custom rate application for electricity distribution rates and charges for the 2027-2031 period (the “**Application**”) with the Ontario Energy Board (“**OEB**”). The IRRs were filed in conjunction with a request by Alectra Utilities (i) for confidential treatment under Parts 5 and 6 of the Practice Direction, and/or (ii) to permanently redact from the public record, information that is (a) not relevant pursuant to Part 11 of the Practice Direction, and (b) personal information pursuant to Part 10 of the Practice Direction, for certain information contained in the IRRs (the “**Confidentiality Request**”).

Notably, the Confidentiality Request pertained to the following types of information:

1. Information related to affiliates and non-rate regulated business activities;
2. Non-public, forward-looking financial information giving rise to liability under securities laws
3. Third-party consultant and vendor pricing and unit pricing information
4. Information about an ongoing procurement, the disclosure of which could interfere with negotiations
5. Sensitive cybersecurity information
6. Commercially sensitive consultant methodology
7. Commercially sensitive information that can prejudice Alectra Utilities’ competitive Position in the labour market
8. Compensation information that is personal information
9. Non-relevant registered business numbers and HST numbers
10. Non-relevant names and email addresses of Alectra Utilities employees and vendors

OEB Staff filed a submission regarding Alectra Utilities’ Confidentiality Request on March 2, 2026. In its submission, OEB Staff did not have any concerns with respect to any of Alectra Utilities’ proposed redactions;¹ however, OEB Staff provided observations about some of the redactions and the corresponding explanations, and invited Alectra Utilities to clarify certain aspects of its Confidentiality

¹ OEB Staff Submission on Confidentiality, EB-2025-0252 (March 2, 2026) (“**Staff Submission**”), p.2.

Request. Alectra Utilities appreciates the opportunity to address OEB Staff's observations in the sections that follow.

1. 1-SEC-1, Attach. 1 Board

OEB Staff agreed with the redactions and Alectra Utilities' explanation and rationale provided in respect of the above-referenced board materials; however, OEB staff indicated that it is unclear why Alectra Utilities redacted two items in the "Note" section on page 26, while the remaining information in this section is not redacted. Upon reviewing OEB Staff's observations, Alectra Utilities has determined to remove the redactions to the "Note" section on page 26.

OEB staff also notes that Alectra Utilities identified redacted information on page 40 in its letter but that there is no redaction on page 40 of the document. Alectra Utilities confirms that page 40 was included in the list of proposed reductions in error, and that no redactions are proposed for the page in question.

2. 6-Staff-206, Attach. 1_AUC PILs Return

OEB staff agreed that the redacted information in the above-referenced draft tax returns is not relevant for the reasons articulated in the Confidentiality Request; however, OEB Staff requested clarification as to why the name of an employee was not redacted on pages 7-8 and 17 of the document were not redacted, while names of other employees were redacted.² Alectra Utilities did not redact the name of the employee included on pages 7-8 and 17 because the employee in question is the Alectra Utilities executive that certified and signed the tax returns in question. As such, Alectra Utilities considered that the information could be minimally relevant, and therefore erred on the side of promoting transparency by not redacting the name of that employee (although it could have taken the alternative approach of redacting that information as well).

3. 1-SEC-10, Attach. 5,6,8

OEB staff agreed with the proposed redactions based on Alectra Utilities' rationale provided in the Confidentiality Request in respect of the above-referenced third party consultant engagement letters.³ As OEB Staff noted, certain names and signatures of third-party consultants from Hatch Ltd. ("**Hatch**") and Guidehouse Canada Inc. ("**Guidehouse**") representatives were redacted in Attachments 5, 6, and 8 (while the names of other representatives from these third-party consultants were not). OEB Staff further noted that the Confidentiality Request stated that Hatch advised Alectra Utilities that the redacted names of its representatives were not part of the consultant project team and did not contribute to the preparation of the studies, and were therefore not relevant to this proceeding; however, OEB Staff indicated that it is unclear whether the name of the Guidehouse representative was redacted for the same reason, and requested that Alectra Utilities provide additional explanations to clarify.

For ease of reference, the following excerpt from the Confidentiality Request pertains to the information in question:

Non-Relevant Third-Party Consultant Information: *This information consists of (i) the signatures of certain third-party consultant representatives; and (ii) in the case of the Hatch*

² Staff Submission, p.2.

³ Staff Submission, p.2.

retainer agreements only (1-Sec-10, Attach. 5_Hatch Climate and 1-Sec-10, Attach. 6_Hatch_LF), the names of certain third-party consultant representatives that did not contribute to the relevant study. In the case of 1-Sec-10, Attach. 5_Hatch Climate and 1-Sec-10, Attach. 6_Hatch_LF, Alectra Utilities proposes to redact the name of the Hatch representatives. Alectra Utilities has been advised by Hatch that each of these representatives were not part of the consultant project team, nor did they contribute to the report in question. In the circumstances, this information, as well as the signature of the vendor's senior representatives, are not relevant as it will not assist intervenors or the OEB with any of the issues to be decided as part of this proceeding.

Alectra Utilities confirms that it is proposing to redact the signature of the Guidehouse senior representative on the same grounds that pertain to the Hatch representative. Namely, the Guidehouse senior representative was not part of the project team, nor did he contribute to the study in question. In addition, we have been advised by Guidehouse that given Mr. Eich's senior role within the organization, the public disclosure of his signature could result in the misuse of his signature. In any event, Alectra Utilities reiterates that the signature of the senior representative of the vendor is not relevant and will provide no assistance to parties to the proceeding.

OEB staff also noted that in 1-SEC-10, Attach. 8, page 13, a redacted signature of a Guidehouse representative appears in the document but is not identified in the letter that was submitted as part of the Confidentiality Request. Alectra Utilities confirms that the redacted signature on page 13 should have been listed in the relevant portion of the Confidentiality Request (in addition to page 9).

Sincerely,

Christine E. Long
Senior Vice-President Regulatory Affairs & Privacy Officer
Christine.Long@alecrautilities.com

cc: Charles Keizer, Daliana Coban, Jonathan Myers, Torys LLP
All parties in EB-2025-0252