

March 27, 2026

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 Inc. (“Alectra Utilities”) 2027 Rebasing Application (the “Application”)– Request for Confidential Treatment of Undertakings

Alectra Utilities filed its undertakings responses on March 27, 2026. Pursuant to the OEB’s *Practice Direction on Confidential Filings* (the “**Practice Direction**”), Alectra Utilities requests that certain information contained in the undertaking responses (i) receive confidential treatment under Parts 5 and 6 of the Practice Direction, and/or (ii) be permanently redacted from the public record as the information is not relevant or contains personal information under Parts 10 and 11 of the Practice Direction.

The proposed redactions are further detailed in Schedule A of this letter, which is a table prepared in accordance with Section 5.1.4(b) of the Practice Direction. That table includes:

- Commercially sensitive and proprietary consultant methodology and data
 - JT-1.8, Attach. 1
 - JT-1.7, pages 2, 4
 - JT-2.10, page 3
 - JT-2.13, pages 2-6, 9-11
 - JT-2.16, pages 4-6
 - JT-3.8, Attach. 1 (Deloitte SAM Report), page 154
 - JT-3.24, Attach. 1 (Deloitte HAM Report), page 231
 - JT-3.24, Attach. 2 (Mercer Executive Pension Study), page 18
- Confidential third-party unit pricing and billing information
 - JT-3.1.1, Attach. 1_PCRs, pages 1-3, 6-7, 9
 - JT-3.24, Attach. 1 (DERMS Needs Assessment), page 44
- Customer load and billing information
 - JT-1.17, pages 3-7
 - JT-1.20, pages 2
 - JT-2.11, pages 1-2

- Cyber security information
 - JT-3.24, Attach. 1 (DERMS Needs Assessment), pages 23-24, 26
- Names and positions of third-party workshop attendees
 - JT-3.24, Attach. 1 (EY DSO Final Report), pages 84, 86
- Commercially sensitive and personal information that can prejudice Alectra Utilities' competitive position in the labour market
 - JT-3.24, Attach. 2 (Mercer Executive Pension Study), pages 7, 10
- Personal compensation information
 - JT-3.1.1, Attach. 1, pages 3, 6
- Information related to affiliates and non-rate regulated business activities
 - JT-1.1.13, Attach. 1_AUC PILs_12312019 T2, page 179
- Non-relevant tax information
 - JT-1.1.13, Attach. 1_AUC PILs_12312019 T2, pages 1-145, 153-206
- Non-relevant signatures of Alectra employees
 - JT-1.1.13, Attach 1_AUC PILs 12312019 T2, pages 7, 45, 148-152
 - JT-3.1.1, Attach. 1_PCRs, page 8
 - JT-3.8, Attach. 1 (Fleet Services Review), page 41
 - JT-3.8, Attach. 1 (Contract Centre Productivity and Efficiency), page 51
 - JT-3.8, Attach. 1 (Sustained Synergies Review), page 84
 - JT-3.8, Attach. 1 (Capital vs. Operating Cost Review), page 112
 - JT-3.8, Attach. 1 (GRE&T Centre Executive Summary), page 119
 - JT-3.8, Attach. 1 (Synergy Savings and Transitional Costs), page 128
- Non-relevant utility logos
 - JT-3.24, Attach. 1 (EY DSO Final Report), pages 52, 54, 76, 84, 86, 88

Appendix A contains a compilation of the unredacted (confidential) versions of the relevant undertaking responses, each of which is labelled as confidential and includes marked (but not "applied") redactions for the specific portions of the responses or documents for which Alectra Utilities requests confidential treatment.

For ease of reference, in Appendix A, Alectra Utilities has marked redactions in blue outline for non-relevant information and green outline for personal information (both of which it seeks to permanently redact from the public record in accordance with Parts 10 and 11 of the Practice Direction), and in red outline for information for which Alectra Utilities seeks confidential treatment (in accordance with Parts 5 and 6 of the Practice Direction).

Please let us know if you have any questions or concerns.

Sincerely,

Natalie Yeates
Vice President, Regulatory Affairs

cc: All Parties
Christine E. Long, Alectra Utilities
Charles Keizer, Torys LLP
Daliana Coban, Torys LLP
Jonathan Myers, Torys LLP

Schedule “A”

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-1.8, Attach 1_2015 CEATI Outage Cost Report	All	Confidential	Y	<p>Commercially Sensitive Third-Party Proprietary Analysis: The redacted information consists of an outage cost study completed by CEATI International, Inc. (“CEATI”) on behalf of a consortium of member public utilities in Canada and the United States. The analysis in question is proprietary, belonging to CEATI and the members who supported this analysis and is not freely available to the public.</p> <p>The public disclosure of this proprietary report and its underlying data and analysis would make such information freely available for use by potential clients of CEATI. This would undermine the basis of CEATI’s membership-based operating model, potentially seriously prejudicing the organization’s commercial and competitive position, as well as their ability to carry on offering such data, research and analysis.</p> <p>Further, the data in question consists of trade secret or financial, commercial, scientific or technical material that has consistently been treated as confidential (Practice Direction, Appendix A, Part (b)).</p>

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-1.7	Pages 2, 4	Confidential	N	<p>Commercially Sensitive Third-Party Proprietary Information: The redacted information describes aspects of the Alectra Utilities' optimization process that reveal a third party's proprietary technical process. Specifically, the redacted information concerns Copperleaf optimization tools and the calculations used to arrive at the resulting Value Measures.</p> <p>Alectra Utilities has been advised by Copperleaf Technologies that the redacted information is commercially sensitive, as it reflects proprietary technology that consists of trade secrets. The public disclosure of this information would prejudice Copperleaf Technology's commercial interests and competitive position and undermine its ability to carry on offering business services (Practice Direction, Appendix A, Part (b)).</p> <p>Previous Treatment: The OEB recently decided that the same elements of the optimization process included in Application (Exhibit 2A, Tab 1, Schedule 1, Distribution System Plan, Appendix C) are confidential because these elements would reveal commercially sensitive information about Copperleaf optimization tool.¹ Alectra has redacted those elements of the response that have been redacted in the pre-filed evidence.</p>
JT-2.10	Page 3			
JT-2.13	Pages 2-6, 9-11			
JT-2.16	Pages 4-6			

¹ EB-2025-0251, Alectra Utilities Corporation, Decision and Order on Confidentiality (February 25, 2026), p.4.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-3.8, Attach. 1 (Deloitte SAM Report)	Page 154	Confidential	N	Commercially Sensitive and Proprietary Consultant Methodology: The redacted information consists of two proprietary frameworks that belong to Deloitte, the author of this report. The information in question is proprietary and of a commercially sensitive nature. Alectra Utilities has been advised by Deloitte that the public disclosure of this information could prejudice the commercial interests and competitive position of the consultant, as it would allow other consultants to ascertain aspects of the methodology and thereby interfere with Deloitte's ability to carry on business offering such data, research and analysis (Practice Direction, Appendix (a)((i),(iv))).
JT-3.24, Attach. 1 (Deloitte HAM Report)	Page 231			
JT-3.24, Attach. 2 (Mercer Executive Pension Study)	Page 18	Confidential	N	Commercially Sensitive Benchmarking Information: The redacted information consists of commercially sensitive information regarding the peer group that Mercer used in this study. Alectra Utilities has been advised by Mercer that the public disclosure of this information would violate Mercer's contractual obligations to the peer group members (Practice Direction, Appendix A, Part (a)(ii)). Alectra Utilities notes that effective benchmarking promotes innovation and improvement within Ontario's electricity sector, and publicly disclosing the identity of peer participants could disincentivize peer participation in the future. This is particularly applicable where those entities participated in the benchmarking database with the understanding that their information and participation would not be publicly disclosed.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-3.1.1, Attach. 1_PCRs	Pages 1-3, 6-7, 9	Confidential	N	<p>Confidential Third-Party Unit Pricing and Billing Information: The redacted information consists of third-party pricing information for certain Alectra Utilities projects, including meter unit costs and IT licensing and software costs. This information either directly discloses unit pricing or can be used in conjunction with other information on the record (e.g., project length) to determine that pricing or billing information.</p> <p>This information is commercially sensitive pricing information, which, if disclosed on the public record, could prejudice the competitive positions of the vendors vis-à-vis their respective competitors, and prejudice the vendors in any ongoing or future negotiations to provide similar services or products to other potential clients (Practice Direction, Appendix A, Part (a)(i)(iii)(iv)). Further, disclosure of this information could prejudice the competitiveness of future Alectra Utilities procurements as other vendors may use the existing unit price as an approximate floor price (Practice Direction, Appendix A, Part (a)(i) & (iii)).</p>
JT-3.24, Attach 1 (DERMS Needs Assessment)	Page 44	Confidential	Y	<p>Confidential Third-Party Unit Pricing: The redacted information consists of estimated unit-pricing and billing rate information of third-party operational technology vendors. This information is presumptively confidential pursuant to the Practice Direction, Appendix B, Part 1.</p> <p>Further, Disclosure of this information could prejudice the competitiveness of future Alectra Utilities procurements as other vendors may use the existing unit price and billing as an approximate floor price (Practice Direction, Appendix A, Part (a)(i) & (iii)).</p>

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-1.17	Pages 3-7	Confidential	Y	<p>Customer Load and Billing Information: The redacted information consists of inputs and outputs from the economic evaluation models pertaining to discrete customer-related expansion projects, including the capital contributions payable by specific customers to Alectra Utilities and the forecast loads for those customers.</p> <p>This information constitutes customer billing information. When used in conjunction with other information in the record, this information can also be used to deduce specific customers' load profile and/or energy usage. This information is presumed to be confidential (Practice Direction, Appendix B, Part 3).</p> <p>Previous Treatment: The OEB has previously found that customer information used to calculate capital contributions payable by specific customers is presumptively confidential under Appendix B of the Practice Direction.²</p>
JT-1.20	Page 2			
JT-2.11	Pages 1-2			
JT-3.24, Attach. 1 (DERMS Needs Assessment)	Pages 23-24, 26	Confidential	N	<p>Cyber Security Information: The indicated pages contain sensitive cyber security information, including information about system design architecture, firewall specifics and data infrastructure, platforms that if disclosed on the public record could be exploited by a malicious actor, thereby increasing the risk to Alectra of being subject to a cyber-attack (Practice Direction, Appendix A, Part c).</p>

² EB-2024-0115, Hydro Ottawa, Decision on Confidentiality (Nov. 3, 2025), p. 3.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-3.24, Attach. 1 (EY DSO Research Study – Final Report)	Pages 84, 86	Confidential	N	Names and Positions of Third-Party Workshop Attendees: The information consists of the names, titles, and photos of representatives from third-party utilities and a representative from EY who presented in workshops. EY has advised that Alectra Utilities does not have EY's consent to publicly disclose this information.
JT-3.24, Attach. 2 (Mercer Executive Pension Study)	Pages 7, 10	Confidential	N	Commercially Sensitive and Personal Information that can Prejudice Alectra Utilities' Competitive Position in the Labour Market: The record contains information regarding compensation information, including pension contribution information, for executives relative to market median. If disclosed, this information could interfere with Alectra Utilities' ability to participate and compete in the labour market for these positions (Practice Direction, Appendix A, Part (a)(i)),(iv). In addition, the redacted compensation and biographical information (e.g., age, years of experience) relate to positions that are filled by a small number of identifiable individuals. Disclosure of this information along with the market data will reveal (or allow someone to ascertain) non-public aspects of the compensation of specific employees, as well as an assessment of the market competitiveness of that compensation. Alectra Utilities seeks confidential treatment of this information to safeguard the privacy of the affected employees while providing the OEB and intervenors confidential access to the information to assist them evaluating the market competitiveness of Alectra Utilities' compensation program.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-3.1.1, Attach. 1_PCRs	Pages 3, 6	Personal Information	N/A	Personal Compensation Information: The redacted information contains the names of individuals whose annual compensation is disclosed as part of a discussion of program costs. Consistent with the definition of “personal information” under the Freedom of Information and Protection of Privacy Act, RSO, 1990, CF 31 (“FIPPA”), this information, which is of a private and personal nature, will not be disclosed pursuant to the Practice Direction, Part 10.
JT-1.1.13, Attach 1_AUC PILs 12312019 T2	Page 179	Confidential	N	<p>Information Related to Affiliates and Non-Rate Regulated Business Activities: This information consists of financial information about Alectra Utilities’ non-regulated affiliates. This information consists of, or is analogous to, non-public financial information about Alectra Utilities’ unregulated affiliates, which is presumptively confidential. Furthermore, the information is confidential as the public disclosure of this information could prejudice Alectra Utilities’ unregulated affiliates commercial interests and competitive position (Practice Direction, Appendix A, Part (a)(i),(iii) and (iv)).</p> <p>In any event, this information is not relevant to the Application and provides no probative value to any issues to be decided by the Board.</p> <p>Previous Treatment: The OEB has previously approved a request for a utility to redact financial information pertaining to the utility’s affiliates (Practice Direction part (e)).³ Alectra Utilities further notes that these redactions are consistent with the approach used</p>

³ EB-2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality and Procedural Order No. 8 (September 26, 2024), p. 4, 10; EB-2024-0115, Hydro Ottawa Limited, Decision on Confidentiality and Issues List (June 24, 2025), pp. 2-3).

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
				in respect of the interrogatory responses (6-Staff-206, Attach. 1_AUC PILs Return), which has not been challenged in this proceeding.
JT-1.1.13, Attach 1_AUC PILs 12312019 T2	Pages 1-145, 153-206	Non-Relevant	N/A	<p>Non-Relevant Tax Information: The information consists of Registered business numbers of Alectra Utilities, its affiliates and other third parties as well as names, phone numbers, job titles, qualifications, employment history of Alectra Utilities employees, contained in Alectra Utilities' corporate income tax returns. The information also includes specifications of charitable donations. This information is not relevant because it will not provide any assistance to the OEB or intervenors in resolving any of the issues that are part of this proceeding.</p> <p>Previous Treatment: Pursuant to Appendix A, Part (e) of the Practice Direction, the OEB has previously decided that this information is not relevant and could expose the utility to the risk of fraud and other malicious acts (Practice Direction, Appendix A, Part (e)).⁴ Alectra Utilities further notes that these redactions are consistent with the approach used in respect of the Application which was accepted by OEB, and interrogatory responses (6-Staff-206, Attach. 1_AUC PILs Return) which were not objected to by Staff.</p>
JT-1.1.13, Attach 1_AUC	Pages 7, 45, 148-152	Non-Relevant	N/A	<p>Signatures of Alectra Employees: The information consists of the signatures of Alectra Utilities employees who prepared these documents. The names and titles of</p>

⁴ 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.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
PILs 12312019 T2				these individuals have not been redacted. The information is not relevant because it will not provide any assistance to the OEB or intervenors in resolving any of the issues that are part of this proceeding.
JT-3.1.1, Attach 1_PCRs	Page 8			
JT-3.8, Attach. 1 (Fleet Services Review)	Page 41			
JT-3.8, Attach. 1 (Contact Centre Productivity and Efficiency)	Page 51			
JT-3.8, Attach. 1 (Sustained Synergies Review)	Page 84			
JT-3.8, Attach. 1 (Capital vs. Operating Cost Review)	Page 112			

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
JT-3.8, Attach. 1 (GRE&T Centre Executive Summary)	Page 119			
JT-3.8, Attach. 1 (Synergy Savings and Transitional Costs)	Page 128			
JT-3.24, Attach. 1 (EY DSO Research Study – Final Report)	Page 57	Non-Relevant	N/A	<p>Names of Alectra Employees: The information consists of names, photos, and positions of Alectra Utilities employees who participated in the workshops with EY. The titles of the relevant persons have not been redacted. This information is not relevant because it will not provide any assistance to the OEB or intervenors in resolving any of the issues that are part of this proceeding.</p> <p>Prior Treatment: Alectra Utilities’ proposal to treat employee names within project documents as non-relevant is consistent with its approach adopted in its interrogatory responses, which was not challenged by the parties or Staff.⁵</p>
JT-3.24, Attach. 1	Pages 52, 54, 76, 84, 86, 88	Non- Relevant	N/A	<p>Utilities’ Logos: The redacted information consists of logos of peer utilities that are referenced in EY’s analysis. EY has advised Alectra Utilities that Alectra Utilities does not have EY’s consent to publicly disclose this</p>

⁵ EB-2025-0252, Alectra Utilization Corporation, Confidentiality Letter (February 20, 2026), p. 16.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
Undertaking	Page #			
(EY DSO Research Study – Final Report]				<p>information within EY's work product. In any event, the referenced utilities are explicitly identified in reports (with one exception described below). As such, the logos are not relevant as they will not provide any assistance to parties to the proceeding or the OEB.</p> <p>Because the logos for the Ontario utilities that are referenced on page 43 are not otherwise identified in the report, in the public version of [JT-3.24, EY DSO Research Study – Final Report] EY replaced the logos of the utilities with text that identifies them.</p>

Appendix “A”

(Intentionally omitted from public version)