



Ontario Energy Board | Commission de l'énergie de l'Ontario

**BY EMAIL**

April 6, 2026

Ritchie Murray  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
[Registrar@oeb.ca](mailto:Registrar@oeb.ca)

Dear Ritchie Murray:

**Re: Ontario Energy Board (OEB) Staff Submission  
Alectra Utilities Corporation (Alectra Utilities)  
2027-2031 Custom Rate Application for Electricity Distribution Rates and  
Charges  
OEB File Number: EB-2025-0252**

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Please find attached OEB staff's submission in the above referenced proceeding, pursuant to the OEB's Practice Direction on Confidential Filings, Section 5.1.6.

Yours truly,

Arlene Bernardo  
Analyst, Distribution Asset Management

Encl.

cc: All parties in EB-2025-0252



# **ONTARIO ENERGY BOARD**

## **OEB Staff Submission on Confidentiality**

**Alectra Utilities Corporation**

**2027-2031 Electricity Distribution Rates**

**EB-2025-0252**

**April 6, 2026**

## Introduction

Alectra Utilities Corporation (Alectra Utilities) filed a custom incentive rate-setting application with the Ontario Energy Board (OEB) on October 14, 2025, under section 78 of the *Ontario Energy Board Act, 1998*, seeking approval for changes to the rates that it charges for electricity distribution, beginning January 1, 2027 (Application).

As part of its undertaking responses, Alectra Utilities filed a letter to the OEB dated March 27, 2026<sup>1</sup> requesting confidential treatment for specific information. Redacted versions of the undertaking responses were filed on the public record of this proceeding and un-redacted versions of the documents were filed confidentially with the OEB pursuant to the OEB's *Practice Direction on Confidential Filings* (Practice Direction).<sup>2</sup>

Alectra Utilities' letter provided a table in Schedule "A" that includes explanations, rationale, and references for the requested redactions for portions of the following undertaking responses:

- JT-1.1.13, Attach. 1\_AUC PILs\_12312019\_T2
- JT-1.7
- JT-1.8, Attach. 1
- JT-1.17
- JT-1.20
- JT-2.10
- JT-2.11
- JT-2.13
- JT-2.16
- JT-3.1.1, Attach. 1\_PCRs
- JT-3.8, Attach. 1 (Deloitte SAM Report)
- JT-3.8, Attach. 1 (Fleet Services Review)
- JT-3.8, Attach. 1 (Contract Centre Productivity and Efficiency)
- JT-3.8, Attach. 1 (Sustained Synergies Review)
- JT-3.8, Attach. 1 (Capital vs. Operating Cost Review)
- JT-3.8, Attach. 1 (GRE&T Centre Executive Summary)
- JT-3.8, Attach. 1 (Synergy Savings and Transitional Costs)
- JT-3.24, Attach. 1 (Deloitte HAM Report)
- JT-3.24, Attach. 1 (DERMS Needs Assessment)
- JT-3.24, Attach. 1 (EY DSO Final Report)
- JT-3.24, Attach. 2 (Mercer Executive Pension Study)

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<sup>1</sup> EB-2025-0252, [Letter to OEB](#) dated March 27, 2026

<sup>2</sup> Ontario Energy Board, [Practice Direction on Confidential Filings](#), December 17, 2021

## OEB Staff Submission

OEB staff submits that it has no concerns with Alectra Utilities' proposed redactions based on certain rationales and explanations provided by Alectra Utilities, except with those contained in JT-1.17.

Alectra Utilities seeks confidential treatment for certain redactions in JT-1.17 on the basis that they are presumptively confidential under Appendix B, Part 3 of the Practice Direction. Alectra Utilities states that the redacted information reveal specific customer capital contributions payable, load profile, or energy usage, which could be deduced from other information on the record.

OEB staff disagrees with the following proposed redactions in JT-1.17 as the information appears to be based on an aggregate assumption of total connections and does not reveal specific customer load profile or energy usage :

- Page 4 – Table 3, Customer Connection/Load
- Page 5 – Table 4, Customer Connection/Load
- Page 6 – Table 5, Customer Connection/Load for residential customers and GS>50
- Page 7 – Table 6, Customer Connection/Load for residential customers and GS>50

OEB staff invites Alectra Utilities to provide further explanation as to how these redactions would disclose specific customer information based on the information available on the record in its reply submission.

Further, OEB staff observes several discrepancies in certain attachments between the page numbers identified in the letter dated March 27, 2026 and those appearing in the attachments themselves. For clarity, OEB staff has listed the page numbers indicated at the bottom of the documents as reference and has summarized the discrepancies observed in Table 1 below, based on OEB staff's view of the pages to which the references correspond.

**Table 1**

<b>Undertaking</b>	<b>Alectra Utilities (March 27, 2026)</b>	<b>OEB Staff</b>
JT-3.8, Attach. 1 (Deloitte SAM Report)	Page 154	Page 11
JT-3.8, Attach. 1 (Fleet Services)	Page 41	Page 17
JT-3.8, Attach. 1 (Contact Centre Productivity and Efficiency)	Page 51	Page 6
JT-3.8, Attach. 1 (Sustained Synergies Review)	Page 84	Page 11

JT-3.8, Attach. 1 (Capital vs. Operating Cost Review)	Page 112	Page 11
JT-3.8, Attach. 1 (GRE&T Centre Executive Summary)	Page 119	Page 6
JT-3.8, Attach. 1 (Synergy Savings and Transitional Costs)	Page 128	Page 9
JT-3.24, Attach. 1 (Deloitte HAM Report)	Page 231	Page 5
JT-3.24, Attach. 1 (DERMS Needs Assessment)	Page 23	Page 22
	Page 24	Page 23
	Page 26	Page 25
	Page 44	Page 43
JT-3.24, Attach. 1 (EY DSO Final Report)	Page 52	Page 7
	Page 54	Page 9
	Page 57	Page 12 or 41
	Page 76	Page 31
	Page 84	Page 39
	Page 86	Page 41
	Page 88	Page 43

OEB staff notes that Alectra Utilities did not include page 57 of JT-3.24, Attach. 1 (EY DSO Final Report) in the summary of its letter dated March 27, 2026; however, Alectra Utilities did include page 57 in Schedule “A” of the letter. OEB staff did not observe any redactions on page 57 of JT-3.24, Attach. 1 (EY DSO Final Report) and believes that Alectra Utilities may have intended to refer to either page 12 or 41, based on the explanation provided. OEB staff further notes that page 12 of JT-3.24, Attach. 1 (EY DSO Final Report) is not redacted.

Based on the redactions identified by OEB staff in Table 1 above, OEB staff submits that it does not have concern with the proposed redactions based on the explanations provided by Alectra Utilities. However, OEB staff invites Alectra Utilities to confirm whether the page numbers identified by OEB staff are correct. In addition, for ease of review in future submissions, OEB staff encourages Alectra Utilities to include the correct page numbers in its submissions.

Lastly, OEB staff submits that in addition to redactions based on non-relevance, the redacted information on pages 128-129 of JT-1.1.13, Attach. 1 also contains personal information, specifically the names and salaries of Alectra Utilities’ apprentices, and should be permanently redacted.

~All of which is respectfully submitted~