

April 28, 2026

**VIA RESS**

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
27th Floor - 2300 Yonge Street  
Toronto, Ontario M4P 1E4

Dear Mr. Murray:

**Re: EB-2025-0297: Application by Ontario Power Generation Inc. (“OPG”) and DNNP LP by its general partner, DNNP GP Inc., (together, the “Applicants”) for an order or orders relating to payment amounts for prescribed generating facilities (the “Application”) – Request for confidential treatment for interrogatory responses**

The Applicant filed its interrogatory responses in the above-noted proceeding on April 22 and April 24, 2026. In accordance with Rule 10 of the Ontario Energy Board’s (“OEB” or the “Board”) *Rules of Practice and Procedure* and the OEB’s *Practice Direction on Confidential Filings* (the “Practice Direction”), the Applicants hereby requests the OEB’s approval to (i) permanently redact from the public record information that is non-relevant and/or (ii) treat as confidential, certain information included in the Application (collectively, the “Confidential Information”).

The Confidential Information is identified in “Appendix A”, which provides the basis for the Applicants’ request for confidential treatment, in accordance with Parts 5.1.4, 10.1.1, and 11.1.2 of the Practice Direction. All proposed Confidential Information has been redacted in the public version of the Application filed with the OEB.

The Applicants have attached “Appendix B” (excluded from the public version of this letter) which includes the confidential (non-redacted) versions of the relevant documents. To this end, the documents that comprise “Appendix B”, are marked “Confidential”, “Confidential – Not Relevant”, or “Confidential - Personal Information”, or a combination, as applicable, and include markings to the specific portions of the documents that contain the Confidential Information.

In “Appendix B”, where appropriate, information for which the Applicants seek confidential treatment on the record has been marked for redaction with a red box (or shaded red, for excel tables), and labour-sensitive information or has been marked for redaction with green boxes. The Applicants applied blue boxes for non-relevant information, and pink boxes for personal information, both of which the Applicants seek to permanently redact from the OEB record.

The Applicants request, and have identified accordingly in green boxes, the portions of certain documents containing commercially sensitive labour information, the disclosure of which on the public record would be detrimental to the Applicants. Given the participation in this proceeding by two of OPG’s labour unions,

the Society of United Professionals (“**Society**”) and the Power Workers Union (“**PWU**”), OPG has a particular concern with the possibility of this subset of confidential information, which has the potential to interfere with collective bargaining negotiations, being disclosed to the Society and PWU. While the Applicants have ensured that any such information has been marked as confidential and is redacted from the public record, this information would in the normal course be available to counsel, experts or consultants to a party who file the OEB’s form of confidentiality Declaration and Undertaking (the “**Undertaking**”). The Applicants understand that the Board typically grants access to confidential documents to a party’s counsel, experts or consultants that have signed the Undertaking.

In respect of the Society and PWU, the Applicants request that only external counsel and/or external consultant(s) representing these unions in this proceeding be permitted to have access to the unredacted documents containing commercially sensitive labour information, as so-identified in Appendix B, and, for external consultants, as a condition of obtaining access, the external consultant be required to execute and file (i) the standard Undertaking, and also (ii) an affidavit or sworn declaration confirming that they are at arms-length from the union and are not (and will not be) involved in any way in collective bargaining on behalf of the union through to the end of the period covered by the Application. The additional requirement in (ii) is appropriate to ensure the protection of this highly sensitive and confidential information in the circumstances, and this request is consistent with the process followed by OEB panels in certain prior proceedings.<sup>1</sup> If the Society or PWU objects to this requirement, or if the Board is not satisfied that the counsel or consultant is external to the relevant union or that they have no involvement in collective bargaining-related activities on behalf of the union over the relevant period, the Applicants reserve the right to make further submissions on this point as needed.

Should the OEB require any further information or clarification as to the requests made herein, please contact the Applicants or their legal counsel as required.

Respectfully submitted,

A handwritten signature in black ink that reads "A. Brown". The signature is written in a cursive, flowing style.

Andrea Brown

cc: Aimee Collier (OPG) via e-mail  
Charles Keizer (Torys LLP) via e-mail

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<sup>1</sup> EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, April 13, 2021 at pp. 6-7.

**Appendix A**

Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-A1-CCC-001, Attachment 1	Page 10, Table 10, Lines 19-28	No	Confidential Treatment	<p><b>Commercially Sensitive Financial Information:</b> The redacted information includes confidential debt terms agreed between OPG and the Canada Infrastructure Bank (“CIB”). To prevent the ability to calculate the redacted CIB terms with other information included in Table 10, ILB 5 values have also been redacted. CIB is a unique lender with a statutory mandate to invest in, and seek to attract investment in, infrastructure projects that will generate revenue and will be in the public interest.</p> <p>CIB debt terms are subject to heightened confidentiality protections because access to such non-public information could give other parties a commercial advantage in future dealings with CIB. As a result, public disclosure of this information could harm CIB and OPG’s competitive position in future negotiations of debt instruments (Practice Direction, Appendix A, Part (a)(i) and (iii), and Part (b)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved of confidential treatment for similar CIB debt information (EB-2025-0297, Decision and Order on Confidentiality–Pre-Filed Evidence, April 13, 2026, at p.4). In addition, the OEB has previously determined that the terms of OPG’s debt arrangements with CIB shall remain confidential, because disclosure might harm OPG’s competitive position in future negotiations of debt instruments (EB-2024-0063, Decision on Confidentiality, dated December 9, 2024, at p. 4; see also Practice Direction, Appendix A, Part (e)).</p>
L-A1-CCC-001, Attachment 1	Page 67, Table 66, Lines 1-2	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of the revenue forecast for heavy water sales and processing and isotope sales in the period from 2026 to 2031. Confidential treatment is not being sought for historical actual revenue amounts (annual breakdown) or total revenue amounts.</p> <p>The redacted information is commercially sensitive. It concerns OPG’s heavy water and isotope sales and proceeds, which is a non-regulated</p>

<sup>1</sup> **Types of Requests:** Requests for (1) Confidential Treatment; (2) Confidential Labour-Sensitive Treatment; (3) Permanent Redaction for Non-Relevance; and (4) Permanent Redaction for Personal Information.

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				<p>business activity. Public disclosure of this information could prejudice OPG's competitive position, because it could interfere significantly with future negotiations being carried out by OPG in this limited market with few transactions. Public disclosure of this information could be exploited by OPG counterparties who could adjust their strategy and negotiating position to adversely impact OPG. As a result, disclosure could significantly interfere with current or future negotiations and prejudice OPG's competitive position in the market for heavy water (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information about heavy water sales and proceeds should be subject to confidential treatment (EB-2020-0290, Decision on Confidential Filings – Pre-filed Evidence, April 13, 2021, at p. 9; EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016, at p. 4; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, March 21, 2014, at p. 3; EB-2010-0008, Decision with Reasons, March 10, 2011, at p. 64; see also Practice Direction, Appendix A, Part (e)).</p>
L-A1-CCC-009, Attachment 1	Pages 1, 3, 5-16, 18	No	Confidential Treatment	<p><b>Public Security and Cybersecurity Information:</b> The redacted information includes report rating and audit report findings from OPG's CIO Insider Threat Data Loss Prevention Audit. The information discusses OPG's insider threat, data loss prevention ("DLP"), identity and access management, and monitoring controls. More specifically, redactions have been applied to audit findings and observations describing specific weaknesses, limitations, or gaps in insider threat and DLP controls. Selective redactions have been also applied to detailed impact assessments, management responses, remediation strategies, and implementation timelines associated with insider threat and DLP findings.</p> <p>Public disclosure of this information would significantly increase the likelihood that malicious actors will attempt to exploit perceived vulnerabilities to subvert OPG's security and cybersecurity safeguards. Disclosure would therefore adversely impact OPG's security and cybersecurity systems (Practice Direction, Appendix A, Part (c)).</p>

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				<p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings are also highly sensitive because the findings concern OPG’s public security and cybersecurity safeguards and status. Public disclosure of this information could result in increased targeting, exploitation of identified control gaps, and heightened risk to OPG’s security environment and operations. Similarly, redacting the names of individuals associated with the action plans prevents the public disclosure of the persons in charge of the respective plans, which could otherwise enhance cyber attacks against OPG, such as phishing and impersonation attacks, that could allow a threat actor to obtain additional sensitive information.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG’s cybersecurity systems and the security of OPG’s facilities should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22; see also Practice Direction, Appendix A, Part (e)).</p> <p>Furthermore, the OEB has previously determined that information related to IT systems or documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2022-0318, Decision on Confidentiality, dated June 23, 2023, at pp. 1-2; EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3).</p>
L-A1-CCC-009, Attachment 3	Pages 1, 3-10, 12	No	Confidential Treatment	<p><b>Cybersecurity Information:</b> The redacted information includes report rating and audit report findings relating to OPG’s Network Security Threat &amp; Vulnerability Management. The information includes detailed cybersecurity audit findings, technical security details, risk ratings, and</p>

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				<p>management action plans describing OPG’s network security posture and threat and vulnerability management processes.</p> <p>Public disclosure of this information would significantly increase the likelihood that malicious actors will attempt to exploit perceived vulnerabilities to subvert OPG’s cybersecurity safeguards. Disclosure would therefore adversely impact OPG’s security and cybersecurity systems (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings are also highly sensitive because the findings concern OPG’s cybersecurity safeguards and status. Public disclosure of this information could result in increased targeting, exploitation of identified control gaps, and heightened risk to OPG’s security environment and operations. Similarly, redacting the names of individuals associated with the action plans prevents the public disclosure of the persons in charge of the respective plans, which could otherwise enhance cyber attacks against OPG, such as phishing and impersonation attacks, that could allow a threat actor to obtain additional sensitive information.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG’s cybersecurity systems and the security of OPG’s facilities should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22; see also Practice Direction, Appendix A, Part (e)).</p> <p>Furthermore, the OEB has previously determined that information related to IT systems or documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2022-0318, Decision on Confidentiality, dated June 23,</p>

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				2023, at pp. 1-2; EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3).
L-A1-CCC-009, Attachment 7	Pages 1, 3, 5-11	No	Confidential Treatment	<p><b>Cybersecurity Information:</b> The redacted information includes report rating, audit report findings, risk type and risk ratings, potential cause and impact and management action plans relating to OPG's Software Management.</p> <p>Public disclosure of this information could reasonably be expected to provide external parties with non-public insight into OPG's internal control environment, security posture, control weaknesses, and remediation activities, which in turn would significantly increase the likelihood that malicious actors will attempt to exploit perceived vulnerabilities to subvert OPG's cybersecurity safeguards. Disclosure would therefore adversely impact OPG's security and cybersecurity systems (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings, risk type and ratings, and potential cause and impact, and management action plans are also highly sensitive because the findings concern OPG's cybersecurity safeguards, status and risk prioritization. Public disclosure of this information could result in increased targeting, exploitation of identified control gaps, and heightened risk to OPG's security environment and operations. Similarly, redacting the names of individuals associated with the action plans prevents the public disclosure of the persons in charge of the respective plans, which could otherwise enhance cyber attacks against OPG, such as phishing and impersonation attacks, that could allow a threat actor to obtain additional sensitive information.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG's cyber-security systems should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290,</p>

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				<p>Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22); see also Practice Direction, Appendix A, Part (e)).</p> <p>Furthermore, the OEB has previously determined that information related to IT systems or documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2022-0318, Decision on Confidentiality, dated June 23, 2023, at pp. 1-2; EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3).</p>
L-A1-CCC-009, Attachment 11	Page 7	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information references a contingency percentage range for a number of ongoing or new projects under OPG’s Renewable Generation Turbine Generator Overhaul Program. Contingency amounts or percentage ranges represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Confidential treatment is not being sought for the estimated total project (program) cost under the turbine generator overhaul program.</p> <p>The redacted information is commercially sensitive. Contingency amounts or percentage ranges are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts or percentage ranges can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingencies. As a result, disclosure of this information could significantly interfere with negotiations or claim disputes, and prejudice OPG’s competitive position to the detriment of OPG’s cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-</p>

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				2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).
L-A1-CCC-009, Attachment 12	Pages 7, 11	No	Confidential Treatment	<p><b>Sensitive Information Regarding Financial Payments:</b> The redacted information relates to financial amounts that OPG owes under Final Settlement Agreement (FSA) with Indigenous communities, and amounts related to Indigenous procurements.</p> <p>This information has been redacted on the basis that the amounts themselves have no probative value in evaluating the issues in this proceeding, and disclosure of these amounts on the public record could lead to misinterpretations or mischaracterizations that may prejudice OPG’s relations with Indigenous communities. In addition, some of this information, particularly related to FSA amounts, is held in confidence by OPG as it pertains to settlement agreements with Indigenous communities. OPG notes that this type of information can be exempt from disclosure under section 15.1(1) (a) (b) of the Freedom of Information and Protection of Privacy Act (“FIPPA”). For transparency, OPG is not seeking permanent redactions of this information, but requests the OEB to exercise its discretion to grant confidentiality for the reasons set out above, and in a manner that is consistent with the spirit of s. 15.1 (1) of FIPPA.</p>
L-A1-CCC-009, Attachment 15	Pages 1-8	No	Confidential Treatment	<p><b>Cybersecurity Information:</b> The redacted information includes report rating, audit report findings, risk type and risk ratings, potential impact findings and management action plans relating to OPG’s Cyber Security Operations Centre. In addition, the name of a third-party managed detection and response provider, the cyber operating model and monitoring coverage, and a reference to internal OPG documentation have been redacted.</p> <p>Public disclosure of this information would significantly increase the likelihood of malicious actors attempting to exploit perceived</p>

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				<p>vulnerabilities to subvert OPG’s cybersecurity safeguards. Disclosure would therefore adversely impact OPG’s security and cybersecurity systems (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings, risk type and ratings, and potential impact of findings, and management action plan information are also highly sensitive because such information concerns OPG’s cybersecurity safeguards, status and risk prioritization. Public disclosure of this information could result in increased targeting, exploitation of identified control gaps, and heightened risk to OPG’s security environment and operations. For example, operational performance metrics show how OPG’s cybersecurity performance is measured and governed, including specific metrics, gaps in monitoring, and the nature of management oversight, which could be exploited by bad actors and increase cybersecurity risk.</p> <p>In addition, public disclosure of OPG’s third-party managed detection and response provider, cyber operating model, and continuous monitoring coverage across IT/OT could increase the targeting risk, reveal defensive posture, and expose vendor-specific intelligence to malicious attacks. Public disclosure of technical particulars, including references to specific internal OPG cybersecurity documents, could materially increase the exploitability of such information.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG’s cyber-security systems should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22); see also Practice Direction, Appendix A, Part (e)).</p> <p>Furthermore, the OEB has previously determined that information related to IT systems or documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would</p>

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				reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2022-0318, Decision on Confidentiality, dated June 23, 2023, at pp. 1-2; EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3).
L-A1-CCC-009, Attachment 16	Pages 1-3, 6, 9	No	Confidential Treatment	<p><b>Public Security and Cybersecurity Information:</b> The redacted information includes report rating, audit report findings, potential impact of findings and management action plans relating to OPG's employee Recruitment and Onboarding. In addition, the redacted information includes information about external parties that provide input for security clearances.</p> <p>Employee security clearance is the first line of defense in the Enterprise Security managed system in protecting OPG's people (insider risk), information, assets, reputational risk, and operations. If the security clearance process integrity, confidentiality, and infallibility is put into question, this could significantly increase the likelihood of external parties (malicious actors) attempting to exploit perceived vulnerabilities to subvert OPG's security clearance process. For these reasons, the redacted information could be targeted for collection and used to inform a physical or cyber attack (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings, impact of findings, and management action plans are also highly sensitive because the findings concern OPG's security clearance process, public security and cybersecurity safeguards and status. Public disclosure of this information could result in increased targeting, exploitation of identified control gaps, and heightened risk to OPG's security environment and operations. Public disclosure of the external parties involved in security clearance could compromise the efficiency in the joint activities and overall relationship of OPG with such external parties.</p>

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				<p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG’s cybersecurity systems and the security of OPG’s facilities should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22; see also Practice Direction, Appendix A, Part (e)).</p> <p>Furthermore, the OEB has previously determined that information related to documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3) (Practice Direction, Appendix A, Part (e)).</p>
L-A1-CCC-009, Attachment 21	Page 2	No	Confidential Treatment	<p><b>Public Security and Cybersecurity Information:</b> The redacted information consists of references to the OPG’s internal governance structure in the context of reliance on third parties to support OPG’s operations (i.e., OPG’s internal lines of business and other functions).</p> <p>Public disclosure of OPG’s detailed internal governance and coordination details with respect to third parties supporting OPG’s operations could assist adversarial reconnaissance activities, thereby increasing the potential for targeted cyber or third-party-enabled threats against OPG. This information could meaningfully influence how threat actors assess, profile, and prioritize targets within OPG. As a result, disclosure could adversely impact the safety and security of OPG’s facilities, and OPG’s cybersecurity systems, and it could increase the risk that a threat actor will exploit this information for malicious purposes (Practice Direction, Appendix A, Part (c)).</p>

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L-A1-CCC-009, Attachment 21	Pages 1, 3-6	No	Confidential Treatment	<p><b>Cybersecurity Information:</b> The redacted information includes report rating, audit report findings, risk type and risk ratings, potential cause and impact and management action plans relating to OPG’s Third Party Risk Management. In particular, the redacted information relates to the effectiveness of programs and processes established by OPG’s Supply Chain and Cyber Security groups.</p> <p>Public disclosure of this information would significantly increase the likelihood that malicious actors will attempt to exploit perceived vulnerabilities to subvert OPG’s cybersecurity and procurement safeguards. Disclosure would therefore adversely impact OPG’s security and cybersecurity systems (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings, risk type and ratings, and potential cause and impact, and management action plans are also highly sensitive because the information pertains to OPG’s internal cybersecurity oversight boundaries and procurement pathways. Disclosure of this information could enable external parties to infer gaps in control coverage, thereby assisting targeted third-party exploitation attempts and increasing cybersecurity risks for OPG. For example, an attacker or high-risk vendor could use these details to steer procurement through pathways less likely to involve Cyber Security, increasing the chance that required due diligence and security requirements are missed.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG’s cyber-security systems should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22); see also Practice Direction, Appendix A, Part (e)).</p>

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				Furthermore, the OEB has previously determined that information related to IT systems or documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2022-0318, Decision on Confidentiality, dated June 23, 2023, at pp. 1-2; EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3).
L-A1-CCC-009, Attachment 22	Pages 1, 3-10	No	Confidential Treatment	<p><b>Cybersecurity Information:</b> The redacted information includes report rating, audit report findings, risk type and risk ratings, potential cause and impact and management action plans relating to OPG’s Artificial Intelligence Governance.</p> <p>Public disclosure of this information would significantly increase the likelihood that malicious actors will attempt to exploit perceived vulnerabilities to subvert OPG’s artificial intelligence and cybersecurity safeguards. Disclosure would therefore adversely impact OPG’s security and cybersecurity systems (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings, risk type and ratings, and potential cause and impact, and management action plans are also highly sensitive because the information pertains to OPG’s artificial intelligence and cybersecurity-related safeguards, status and risk prioritization. Public disclosure of this information could result in increased targeting, exploitation of identified control gaps, and heightened risk to OPG’s cybersecurity environment and operations. Similarly, redacting the names of individuals associated with the action plans prevents the public disclosure of the persons in charge of the respective plans, which could otherwise enhance cyber attacks against OPG, such as phishing and impersonation attacks, that could allow a threat actor to obtain additional sensitive information.</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p><b>Previous Treatment:</b> The OEB has previously determined that information related to cybersecurity protocols or internal audit findings related to OPG’s cyber-security systems should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22); see also Practice Direction, Appendix A, Part (e)).</p> <p>Furthermore, the OEB has previously determined that information related to IT systems or documents that identify vulnerabilities and gaps in cybersecurity which, if placed on the public record, would reasonably be expected to result in a security breach, or measures that address cybersecurity requirements, should be subject to confidential treatment (EB-2022-0318, Decision on Confidentiality, dated June 23, 2023, at pp. 1-2; EB-2021-0009, Decision on Confidentiality, dated August 19, 2021, at pp. 2-4; EB-2018-0271, Decision on Confidentiality and Procedural Order No. 2, dated February 6, 2019, at pp. 2-3).</p>
L-A1-CCC-009, Attachment 23	Page 4	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information relates to OPG’s comments about a vendor’s performance and investment planning information exchange.</p> <p>The redacted information is commercially sensitive, and its public disclosure could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. More specifically, disclosure of positive vendor commentary could be leveraged by that vendor in future negotiations with the Applicants, to the Applicants’ and the ratepayers’ detriment. Disclosure of negative commentary could result in reputational harm for the vendor or could impact Applicants’ relationships with these and other vendors, impairing the Applicants’ bargaining position in the future. As a result, disclosure could damage the contractual relationship, prejudice the Applicants’ and the vendor’s competitive position in the market, and jeopardize current or future negotiations. Disclosure could also result in reputational harm for that vendor (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-A1-CCC-009, Attachment 26	Pages 1, 3-6	No	Confidential Treatment	<p><b>Public and Physical Security:</b> The redacted information includes report rating, audit report findings, risk type and risk ratings, potential impact of findings and management action plans relating to OPG's Security Incident and Crisis Management. More specifically, the redacted information identifies specific vulnerabilities, the scale of those vulnerabilities, and OPG's controls and action plan to address them.</p> <p>Public disclosure of this information will significantly increase the likelihood that malicious actors will attempt to exploit perceived vulnerabilities to subvert OPG's security safeguards. For this reason, the redacted information could be targeted for collection and used to inform a physical attack (Practice Direction, Appendix A, Part (c)).</p> <p>In particular, public disclosure of report rating information could be used to infer OPG security posture with respect to the audit report, which could meaningfully influence how threat actors assess, profile, and prioritize targets. Audit report findings are also highly sensitive because the findings concern OPG's public security safeguards and status. Malicious actors could acquire knowledge and insights into the magnitude of OPG's security, systems and status, the scale and nature of established issues, and the dimensions of defensive mechanisms involved.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to internal audit findings regarding OPG's cybersecurity systems and the security of OPG's facilities should be subject to confidential treatment (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, dated August 29, 2025, at</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				p. 7; EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 18-19, 22) (Practice Direction, Appendix A, Part (e)).
L-A1-CCC-010, Attachment 1	Pages 14-15, 20	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of the nuclear capability and financial capacity requirements that a potential future assignee of the DNNP facility agreements would be required to satisfy.</p> <p>If, in the future, an assignment of the DNNP facility agreements was considered, the highly specialized and exclusive nature of the nuclear operator industry is such that the number of potential suitors would be extremely small. The nuclear capability and financial capacity requirements redacted here further narrow the marketplace for potential assignees. It is likely there would be very few qualified successors who satisfy these requirements, and the identity of such a successor (or successors) may be easily discernable, either to the qualified successor(s) themselves, or the market.</p> <p>If these nuclear capability and financial capacity requirements were publicly available and such an assignment was contemplated, the Applicants would be prejudiced in negotiating same, because the qualified successors would have an informed idea of how many other parties (if any) the Applicants could reasonably negotiate with (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-A1-CCC-010, Attachment 3	Pages 16, 22			
L-A1-CCC-010, Attachment 4	Pages 18, 27, 136			
L-A1-CCC-010, Attachment 3	Pages 67, 70, 103	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information contains details of the Applicants' insurance policies, including insurers, policy numbers, policy periods, coverage amounts, and other sensitive commercial terms that are consistently treated in a confidential manner by the Applicants. These details are bilaterally negotiated between the Applicants and insurers. These terms are not standard and reflect the parties' negotiated positions and commercial compromises and both parties would be prejudiced in future negotiations if these details were publicly available to potential counterparties.</p> <p>Public disclosure of these terms will provide future counterparties with insight into the parties' previous commercial positions. This information</p>
L-A1-CCC-010, Attachment 4	Pages 83, 86, 88, 123			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>could be used as an artificial benchmark in future negotiations, reducing both parties' ability to negotiate more favorable terms and will prejudice their competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their strategies to the detriment of the parties and ratepayers.</p> <p>Additionally, these details provide an indication of the Applicants' internal risk appetite which, if publicly disclosed, could prejudice the Applicants' competitive position and interfere with future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously approved a request for confidential treatment of commercially sensitive information regarding OPG's insurance policies (EB-2020-0290, Decision on Confidentiality, June 8, 2021, at p.21) (Practice Direction, Appendix A, Part (e)).</p>
L-A1-CCC-010, Attachment 4	Pages 3, 18, 25, 36, 67	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information describes certain commercial arrangements in place that are related to the IPA and address OPG as a first mover of SMR technology. This information is commercially sensitive and would prejudice the future competitive position of the Applicants.</p> <p>These arrangements are highly sensitive as the IPA is a first-of-a-kind agreement and DNNP is a first-of-a-kind project. Competitors in the growing SMR market do not have access to this information and its disclosure would reveal information about how OPG and its counterparties are structuring and delivering the first SMR in North America.</p> <p><b>Third Party Commercially Sensitive Information:</b> In addition, because the redacted information also describes the first-mover arrangements between the Applicants and its technology provider, public disclosure of this information could prejudice the technology provider's competitive position in providing similar services to non-first-mover clients. It may also impair negotiations with other customers, who would rely on the redacted information in those negotiations. As a result, disclosure of this commercially sensitive information could</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>prejudice the competitive positions of the technology provider, interfere with their future negotiations, and may produce a significant loss to them. (Practice Direction, Appendix B, Parts 1 and 2; Practice Direction, Appendix A, parts (a)(i), (iii) and (iv)).</p> <p><b>Impact on Future Negotiations:</b> If the redacted information is made public, it would also interfere with ongoing negotiations about DNNP and on other nuclear projects (Practice Direction, Appendix A, Part a(iii)). The disclosure of the first-mover arrangements between OPG and technology provider would act as a baseline in future negotiations, impairing OPG's and its counterparties' flexibility when negotiating future SMR execution agreements.</p> <p>In addition, any compromises that OPG's counterparties made regarding key commercial terms or otherwise will become public, which would impair OPG's relationship with those parties as they negotiate agreements for the remaining units of DNNP and for other projects. Disclosure of this confidential information would also make it less likely that parties would be willing to engage with OPG on other first mover projects like DNNP, as doing so would put their confidential commercial information at risk.</p> <p><b>Previous Treatment.</b> In this proceeding, the OEB concluded that a summary of the IPA in the pre-filed evidence qualified for confidential treatment. It did so pursuant to Appendix A, Part (a)(i) (competitive position) and Appendix A, Part (a)(iii) (interfere with negotiations). For similar reasons, the redacted information – which describes commercial arrangements related to the IPA – qualify for confidential treatment.</p>
L-A1-CCC-010, Attachment 4	Pages 23, 43, 74	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information contains commercially sensitive, non-public information regarding the parties involved in the Management, Operations, Maintenance and Administration Services Agreement, as well as financing arrangements and parties. This information is commercially sensitive and consistently treated in a confidential manner by the Applicants.</p> <p>The redacted information details the bespoke arrangement between these parties and as such, if disclosed on the public record, could</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>prejudice the competitive position of the parties, as other clients may attempt to leverage this information into a similar arrangement. In addition, if this information is disclosed, any compromises that OPG's counterparties made regarding key commercial terms or otherwise will become public, which would impair OPG's relationship with those parties as they negotiate agreements for the remaining units of DNNP and for other projects. Disclosure of this confidential information would also make it less likely that parties would be willing to engage with OPG on other first mover projects like DNNP, as doing so would put their confidential commercial information at risk.</p> <p>Finally, the terms of the financing for the project are not complete. As such, the disclosure of these details on the public record could significantly interfere with future financing negotiations carried out by the Applicants (Practice Direction, Appendix A, Part (a)(i), (iii), and (b)).</p>
L-A1-CCC-012	Pages 1, 4-5	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information describes certain commercial arrangements in place that are related to the IPA and that address OPG as a first mover of SMR technology. These arrangements are highly sensitive, as the IPA is a first-of-a-kind agreement and DNNP is a first-of-a-kind project. The redacted information is the Applicants' commercial/financial information that they have consistently treated in a confidential manner.</p> <p>Competitors in the growing SMR market do not have access to this information, and its disclosure would reveal information about how OPG and its counterparties are structuring and delivering the first SMR in North America. This information is therefore commercially sensitive, and its disclosure would prejudice the future competitive position of the Applicants. (Practice Direction, Appendix A, parts (a)(i), (iii) and (iv)).</p> <p><b>Third-Party Commercially Sensitive Information:</b> In addition, because the redacted information describes the first-mover arrangements between the Applicants and its technology provider, public disclosure of this information could prejudice the technology provider's competitive position in providing similar services to non-first mover clients. The disclosure of this information may also impair</p>
L-A1-CCC-012, Attachment 1	All			
L-A1-CCC-012, Attachment 2	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>negotiations with other customers, who would rely on the redacted information and attachments in those negotiations.</p> <p>As a result, disclosure of this commercially sensitive information could prejudice the competitive positions of the technology provider, interfere with their future negotiations, and may produce a significant loss to them. (Practice Direction, Appendix B, Parts 1 and 2; Practice Direction, Appendix A, parts (a)(i), (iii) and (iv)).</p> <p><b>Impact on Future Negotiations:</b> Disclosure of the redacted information would also interfere with ongoing negotiations about DNNP and about other nuclear projects. The disclosure of the first-mover arrangements between OPG and technology provider would act as a baseline in future negotiations, impairing OPG’s and its counterparties’ flexibility when negotiating future SMR execution agreements.</p> <p>In addition, any compromises that OPG’s counterparties made regarding key commercial terms or otherwise will become public, which would impair OPG’s relationship with those parties as they negotiate agreements for the remaining units of DNNP and for other projects. Disclosure of this confidential information would also make it less likely that parties would be willing to engage with OPG on other first-mover projects like DNNP, as doing so would put their confidential commercial information at risk. (Practice Direction, Appendix A, parts (a)(i), (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB concluded that a summary of the IPA in the pre-filed evidence qualified for confidential treatment. The OEB did so pursuant to Appendix A, Part (a)(i) (competitive position) and Appendix A, Part (a)(iii) (interfere with negotiations (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at pp. 10-11)).</p>
L-A1-Staff-002, Attachment 1	All	Yes	Confidential Treatment	<p><b>Third-Party Proprietary Information Dataset and/or Model of Consultant:</b> The redacted information consists of the underlying work files of various consultants. The documents and files contain the confidential and proprietary datasets and models of these third-party</p>
L-A1-Staff-002, Attachment 2	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-A1-Staff-002, Attachment 3	All			<p>consultants and as such are presumptively confidential under the Practice Direction. (Practice Direction, Appendix B, Part 7).</p> <p>These documents and files have consistently been treated as confidential by the Applicants and by the consultants. Disclosure of these proprietary documents and files on the public record could prejudice the commercial interests and competitive position of the consultants, as it would allow others to ascertain the proprietary and sensitive aspects of their methodologies, undermining the basis of the consultants' business. (Practice Direction, Appendix A, Part (a)(i), (iv), and (b)).</p> <p>The underlying datasets also include commercially sensitive benchmarking data that is in the interest of the Applicants, ratepayers, and the broader public interest to treat confidentially in order to incentivize the exchange of shared experience and knowledge among the limited parties who possess it in a free and open manner. That free and open exchange would be at risk if the OEB required this information to be made public (Practice Direction, Appendix A, Part A(iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously redacted information that reveals proprietary aspects of a consultants' methodology (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 26, 2024 at p. 9). The OEB has also previously approved confidential treatment for benchmarking information. (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 6, 2024, at p. 7) (Practice Direction, Appendix A, Part (e)).</p>
L-A1-Staff-002, Attachment 4	All			
L-A1-Staff-002, Attachment 5	All			
L-A1-Staff-002, Attachment 6	All			
L-A1-Staff-002, Attachment 9	All			
L-A1-Staff-002, Attachment 15	All			
L-A1-Staff-002, Attachment 16	All			
L-A1-Staff-002, Attachment 17	All			
L-A1-Staff-002, Attachment 18	All			
L-A1-Staff-002, Attachment 19	All			
L-A1-Staff-002, Attachment 20	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-A1-Staff-293	Page 17 Chart 6	No	Confidential Information	<p><b>Commercially Sensitive Information:</b> The redacted information consists of the forecast for nuclear non-energy revenues and non-energy direct costs in the period from 2027 to 2031. Confidential treatment is not being sought for total revenue amounts.</p> <p>The redacted information is commercially sensitive. The forecast for non-energy revenues and non-energy direct costs concerns OPG's non-regulated business. Public disclosure of this information could prejudice OPG's competitive position, because it could interfere significantly with future negotiations being carried out by OPG in this limited market with few transactions. Public disclosure of this information could be exploited by OPG counterparties who could adjust their strategy and negotiating position to adversely impact OPG. As a result, disclosure could significantly interfere with current or future negotiations and prejudice OPG's competitive position in the market for heavy water (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information about heavy water sales and proceeds (i.e., one type of non-energy revenues) should be subject to confidential treatment (EB-2020-0290, Decision on Confidential Filings – Pre-filed Evidence, April 13, 2021, at p. 9; EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016, at p. 4; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, March 21, 2014, at p. 3; EB-2010-0008, Decision with Reasons, March 10, 2011, at p. 64; see also Practice Direction, Appendix A, Part (e)).</p>
L-A2-Staff-016, Attachment 1	Pages 2, 4-5	No	Permanent Redaction for Non-Relevance	<p><b>Non-Relevant Information:</b> The redacted information consists of forward-looking commercial information related to OPG's unregulated subsidiaries engaged in competitive business activity, and OPG's unregulated business. It is therefore not relevant to the determination of payment amounts in this proceeding (Practice Direction, Part 11).</p> <p><b>Commercially Sensitive Information and Confidential Financial Information:</b> In addition, the redacted information consists of commercially sensitive information not available to the public that has consistently been treated as confidential by OPG and its subsidiaries. If</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>disclosed on the public record, this information could prejudice OPG and its subsidiaries' competitive position (Practice Direction, Appendix A, Part (a)(i) and (b)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that similar information in OPG's Business Plan related to OPG's unregulated business or that of its subsidiaries is not relevant to OPG's payment amounts applications (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.4; see also EB-2020-0290, Decision on Confidentiality, June 8, 2021, at pp. 2-3; EB-2016-0152, Procedural Order No. 3, November 1, 2016, at p. 4; EB-2013-0321, Procedural Order No. 4, March 21, 2014, at p. 6; EB-2010-0008, Procedural Order No. 3, July 21, 2010, at p. 5) (Practice Direction, Appendix A, Part (e)).</p>
L-A2-Staff-016, Attachment 1	Page 4	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to the scheduling for various elements of Units 2-4 of the Darlington New Nuclear Project.</p> <p>The Applicants are currently in the process of negotiating the definitive agreements for Units 2-4 with contractors, and public disclosure of this information would prejudice those negotiations. Disclosure of this information may compromise the ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants' ability to secure greater value for the ratepayers. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has approved confidential treatment for substantially the same scheduling information, noting that confidential treatment is appropriate for future unit information, as public disclosure could prejudice ongoing negotiations for Unites 2-4 and cause competitive harm (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15) (Practice Direction, Appendix A, Part (e)).</p>
L-A2-Staff-016, Attachment 1	Page 5	No	Confidential Treatment	<p><b>Competitive Prejudice, Impact on Negotiations:</b> OPG's shareholder is His Majesty the King in right of Ontario, as represented by the</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>Minister of Energy and Mines (the “Minister”). This redacted information includes the details of the Minister’s expectations for OPG in prioritizing the Province’s economic development needs by seeking opportunities to support Ontario’s economic and energy security.</p> <p>If this information is disclosed on the public record, OPG’s competitive position in executing any related strategies would be prejudiced, as it would signal to potential counterparties the expectations of OPG’s shareholder. This information may be leveraged by those counterparties in future negotiations, who may structure their negotiation and commercial strategies to exploit the shareholder’s expectations, to the detriment of OPG and potentially ratepayers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-B2-Staff-018, Attachment 1	Pages 1, 10-11	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for a new project. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and other) have been redacted as well insofar as these costs can be used to determine the contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claim disputes, and prejudice OPG’s competitive position to the detriment of OPG’s cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of</p>
L-B2-Staff-018, Attachment 2	Pages 1, 9			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).
L-B2-Staff-018, Attachment 1	Page 4	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor. These terms are not standard and reflect the parties' negotiated positions and commercial compromises.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and that vendor's negotiating thresholds, risk tolerances, pricing expectations, and willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor's flexibility to negotiate more favorable terms and will prejudice OPG or that vendor's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their pricing, risk sharing, or negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG or vendor's competitive position to the detriment of OPG's cost efficiency efforts for its rate payers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-B2-Staff-018, Attachment 2	Page 4			
L-B2-Staff-018, Attachment 1	Page 8	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of current efficiency and expected turbine efficiency gains, such as the current baseline and target result runner efficiency.</p> <p>The redacted information is commercially sensitive. Turbine efficiency and efficiency gains are kept confidential from competitors because this information could allow competitors to infer and anticipate OPG's bidding behavior in the competitive wholesale electricity market, plan</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>strategies, and adjust their own market offers accordingly in a way that could harm competition in the IESO administered market. Confidentiality is necessary to preserve fair competition and market integrity, ensuring that no participant has access to another participant's commercial strategy or bidding behavior. As a result, disclosure of efficiency gains could prejudice OPG's competitive position in the electricity market (Practice Direction, Appendix A, Part (a)(i)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to efficiency gains should be subject to confidential treatment (EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, March 21, 2014, at p. 5) (Practice Direction, Appendix A, Part (e)).</p>
L-C1-CCC-036	Page 6	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information contains the commercially sensitive, bespoke terms of three credit facilities. These terms are bilaterally negotiated, non-public, and consistently treated as confidential by the Applicants and the other parties.</p> <p>Access to such information could give other parties, either other lenders or borrowers, information not otherwise publicly available that could provide a commercial advantage unrelated to this proceeding that could be leveraged in future negotiations with either OPG or the counterparties (Practice Direction, Appendix A, Part (a)(iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that similar highly confidential debt information warrants confidential treatment (EB-2024-0063, Decision on Confidentiality, December 9, 2024, at p. 4) (Practice Direction, Appendix A, Part (e)).</p>
L-C1-SEC-030, Attachment 1	All	Yes	Confidential Treatment	<p><b>Third-Party Proprietary Information and/or Model of Consultant:</b> The documents referenced in L-C1-SEC-030 are credit rating reports of peer group companies and research updates used by Concentric Energy Advisors, a consultant retained by OPG. These documents have been created by and are owned by a third-party, which has made</p>
L-C1-SEC-030, Attachment 2	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-C1-SEC-030, Attachment 3	All			<p>these documents available to Concentric Energy Advisors through subscription agreement. Because the documents and files contain the proprietary datasets and models of a third-party, they are presumptively confidential (Practice Direction, Appendix B, Part 7).</p> <p><b>Commercially Sensitive Information:</b> In addition, the redacted documents are commercially sensitive materials that have consistently been treated as confidential by the Applicants and their consultant. Public disclosure of these proprietary documents and files would prejudice the commercial interests and competitive position of the consultant and the third-party information owner, as it would allow others to ascertain the proprietary and sensitive aspects of their methodologies, undermining the basis of the consultant and third party's business (Practice Direction, Appendix A, Part (a)(i), (iv), and (b)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information that reveals proprietary aspects of a consultants' methodology can be treated confidentially. (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 26, 2024, at p. 9; see also Practice Direction, Appendix A, Part (e)).</p>
L-C1-SEC-030, Attachment 4	All			
L-C1-SEC-030, Attachment 5	All			
L-C1-SEC-030, Attachment 6	All			
L-C1-SEC-030, Attachment 7	All			
L-C1-SEC-030, Attachment 8	All			
L-C1-SEC-030, Attachment 9	All			
L-C1-SEC-030, Attachment 10	All			
L-C1-SEC-030, Attachment 11	All			
L-C1-SEC-030, Attachment 12	All			
L-C1-SEC-030, Attachment 13	All			

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L-C1-SEC-030, Attachment 14	All			
L-C1-SEC-030, Attachment 15	All			
L-C1-SEC-030, Attachment 16	All			
L-C1-SEC-030, Attachment 17	All			
L-C1-SEC-030, Attachment 18	All			
L-C1-SEC-030, Attachment 19	All			
L-C1-SEC-030, Attachment 20	All			
L-C1-SEC-030, Attachment 21	All			
L-C1-SEC-030, Attachment 23	All			
L-C1-SEC-030, Attachment 24	All			
L-C1-SEC-030, Attachment 25	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-C1-SEC-030, Attachment 26	All			
L-C1-SEC-030, Attachment 27	All			
L-C1-SEC-030, Attachment 28	All			
L-C1-SEC-030, Attachment 29	All			
L-C1-SEC-030, Attachment 30	All			
L-C1-SEC-030, Attachment 31	All			
L-C1-SEC-030, Attachment 32	All			
L-C1-SEC-030, Attachment 33	All			
L-C1-SEC-030, Attachment 34	All			
L-C1-SEC-030, Attachment 35	All			
L-C1-SEC-033, Attachment 1	Pages 6-7, 9-10, 12-13, 15-16, 18-19, 21-22, 24-25, 27-28, 30-31,	No	Confidential Treatment	<b>Commercially Sensitive Information:</b> The redacted information consists of specific return on equity (ROE) figures (relating to margins on heavy water sales as part of nuclear revenue) and other related information that would allow determination of the sales and proceeds.

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
	33-34, 36-37, 39-40, 42-43, 45-46, 48-49			<p>The redacted information is commercially sensitive. It concerns OPG's heavy water sales and processing, which is a non-regulated business activity. Public disclosure of this information could prejudice OPG's competitive position, because it could interfere significantly with future negotiations being carried out by OPG in this limited market with few transactions. Public disclosure of this information could be exploited by OPG counterparties who could adjust their strategy and negotiating position to adversely impact OPG. As a result, disclosure could significantly interfere with current or future negotiations and prejudice OPG's competitive position in the market for heavy water (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to sales and proceeds from heavy water sales business, or information that would allow determination of such information, should be treated confidentially (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, dated November 1, 2016, at p. 4; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, dated March 21, 2014, at p. 3) (Practice Direction, Appendix A, Part (e)).</p>
L-C1-SEC-035, Attachment 1	All	No	Confidential Treatment	<p><b>Commercially Sensitive Information and Confidential Financial Information:</b> The redacted information consists of OPG's modelled corporate credit metrics, reflecting the combined regulated and unregulated assets and business of OPG. This information was previously redacted in pre-filed evidence.</p> <p>The redacted information is commercially sensitive. Disclosure of this aggregated information (combined with information regarding the regulated business already disclosed) would disclose information related to OPG's unregulated business and facilities. OPG consistently treats information relating to its unregulated business as confidential financial information and confidential commercially sensitive information. If disclosed on the public record, it could prejudice OPG's competitive position with respect to those assets and business (Practice Direction, Appendix A, Part (a)(i) and (b)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p><b>Previous Treatment:</b> The OEB has previously determined that similar information in OPG’s Business Plan related to the combined regulated and unregulated business and assets of OPG is confidential (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, April 13, 2021 at p. 9; EB-2016-0152, Procedural Order No. 3, November 1, 2016 at pp. 3-4; EB-2013-0321, Procedural Order No. 4, March 21, 2014 at p. 6; and EB-2010-0008, Procedural Order No. 3, July 21, 2010, p. 5; see also Practice Direction, Appendix A, Part (e)).</p>
L-C1-SEC-037, Attachment 2	Page 8	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information contains commercially sensitive, non-public information regarding the parties involved in the Management, Operations, Maintenance and Administration Services Agreement, as well as financing arrangements and parties.</p> <p>The redacted information details the bespoke arrangement between these parties. It is commercially sensitive and has been consistently treated as confidential by the parties. If this information was disclosed on the public record, other clients may attempt to leverage this information into a similar arrangement, which could prejudice the competitive position of the parties. (Practice Direction, Appendix A, Part (a)(iii) and (iv)).</p> <p>Additionally, the terms of the financing for the project are not complete. As such, the disclosure of these details on the public record could significantly interfere with future financing negotiations carried out by the Applicants (Practice Direction, Appendix A, Part (a)(i), (iii), and (b)).</p>
L-C1-SEC-037, Attachment 2	Page 17	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information contains details of the Applicants’ insurance policies that have consistently been treated as confidential by the Applicants. These details are bilaterally negotiated between the Applicants and insurers. These terms are not standard and reflect the parties’ negotiated positions and commercial compromises.</p> <p>Public disclosure of these terms will provide future counterparties with insight into the parties’ previous commercial positions. This information</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>could be used as an artificial benchmark in future negotiations, reducing both parties' ability to negotiate more favorable terms and will prejudice their competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their strategies to the detriment of the parties and ratepayers. (Practice Direction, Appendix A, Part (a)(iii) and (iv)).</p> <p>Additionally, these details provide an indication of the Applicants' internal risk appetite which, if publicly disclosed, could prejudice the Applicants' competitive position and interfere with future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously approved a request for confidential treatment of commercially sensitive information regarding OPG's insurance policies (EB-2020-0290, Decision on Confidentiality, June 8, 2021, at p.21) (Practice Direction, Appendix A, Part (e)).</p>
L-C1-SEC-038	Pages 1-2	No	Confidential Treatment	<p><b>Commercially Sensitive Financial Information:</b> The redacted information consists of investment advice provided to the Applicants regarding the financing strategy for DNNP. It is the proprietary analysis undertaken by CIBC, including consultation with other industry participants. It is financial material that is consistently treated in a confidential manner by CIBC and the Applicants. CIBC provided this information to the Applicants on a confidential basis for the purpose of informing the Applicants' financing strategy.</p> <p>If this information is disclosed on the public record and Applicants subsequently go to the market for financing, the disclosed information could likely interfere with the negotiations to the detriment of the Applicants and ratepayers, as investors would benefit from the analysis and strategy associated, potentially allowing them to dictate the terms of the transaction. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p>Public disclosure of this information may also inhibit the ability of CIBC to provide its clients in general, and the Applicants in particular, with informed, comprehensive advice and market analysis on financing</p>
L-C1-SEC-038, Attachment 1	Pages 3, 6-14			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				strategies, out of fear that such advice or analysis may be disclosed publicly. (Practice Direction, Appendix A, Part (a)(iii), (b))
L-C1-SEC-040	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Financial Information:</b> The redacted information describes the confidential debt terms of OPG and the Canada Infrastructure Bank (“CIB”). CIB is a unique lender with a statutory mandate to invest in, and seek to attract investment in, infrastructure projects that will generate revenue and will be in the public interest.</p> <p>CIB debt terms are subject to heightened confidentiality protections because access to such non-public information could give other parties a commercial advantage in future dealings with CIB. As a result, public disclosure of this information could harm CIB and OPG’s competitive position in future negotiations of debt instruments (Practice Direction, Appendix A, Part (a)(i) and (iii), and Part (b)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved of confidential treatment for similar CIB debt information (EB-2025-0297, Decision and Order on Confidentiality–Pre-Filed Evidence, April 13, 2026, at p.4). In addition, the OEB has previously determined that the terms of OPG’s debt arrangements with CIB shall remain confidential, because disclosure might harm OPG’s competitive position in future negotiations of debt instruments (EB-2024-0063, Decision on Confidentiality, dated December 9, 2024, at p. 4; see also Practice Direction, Appendix A, Part (e)).</p>
L-D1-AMPCO-013, Attachment 2	Page 2	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information relates to OPG’s commentary about a vendor’s performance. Or, in the case of Attachment 3, the redacted information references a vendor under a project, which when combined with other documents under this project refer directly to this and other vendors and their performance (i.e., L-D1-AMPCO-013, Attachment 8), disclose the vendor’s performance.</p> <p>The redacted information is commercially sensitive, and its public disclosure could prejudice the competitive positions of the relevant</p>
L-D1-AMPCO-013, Attachment 3	Page 4			
L-D1-AMPCO-013, Attachment 7	Pages 2-7			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D1-AMPCO-013, Attachment 8	Pages 1, 3-4, 6-7, 13-14, 17-18, 24, 26-30			<p>parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. More specifically, disclosure of positive vendor commentary could be leveraged by that vendor in future negotiations with the Applicants, to the Applicants' and the ratepayers' detriment. Disclosure of negative commentary could result in reputational harm for the vendor or could impact Applicants' relationships with these and other vendors, impairing the Applicants' bargaining position in the future. As a result, disclosure could damage the contractual relationship, prejudice the Applicants' and the vendor's competitive position in the market, and jeopardize current or future negotiations. Disclosure could also result in reputational harm for that vendor (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D1-AMPCO-013, Attachment 9	Pages 3, 7-9			
L-D1-AMPCO-013, Attachment 7	Pages 2, 4-6	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information consists of the name of technology and service providers (e.g., vendors or OEM suppliers for a project).</p> <p>The redacted information is commercially sensitive. It is kept confidential from competing vendors as a means for OPG to protect information about strategic sourcing decisions, proprietary technological choices, negotiations with vendors, and to control project costs. Public disclosure of vendors' names that have been contracted or negotiated with for a particular project or type of work could be exploited by competing vendors as they will be guided to search for other available information about vendor equipment, models, prices, services or fees, and therefore build a credible project vendor cost profile. Combined with the information about total project costs and scope of work, competing vendors could increase their bids to</p>
L-D1-AMPCO-013, Attachment 10	Page 2			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				maximize profits in current or future negotiations with OPG or increase their bids in negotiations with a vendor already selected by OPG. As a result, disclosure could significantly interfere with negotiations and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D1-AMPCO-013, Attachment 9	Pages 4-6	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of actual turbine efficiency data, including the rated power to maximum power at maximum head conditions.</p> <p>The redacted information is commercially sensitive. Turbine efficiency and efficiency gains are kept confidential from competitors because this information could allow competitors to infer and anticipate OPG's bidding behavior in the competitive wholesale electricity market, plan strategies, and adjust their own market offers accordingly in a way that could harm competition in the IESO administered market. Confidentiality is necessary to preserve fair competition and market integrity, ensuring that no participant has access to another participant's commercial strategy or bidding behavior. As a result, disclosure of efficiency gains could prejudice OPG's competitive position in the electricity market (Practice Direction, Appendix A, Part (a)(i)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to efficiency gains should be subject to confidential treatment (EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, March 21, 2014, at p. 5) (Practice Direction, Appendix A, Part (e)).</p>
L-D1-AMPCO-015, Attachment 1	Pages 1, 3, 5	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for new and ongoing projects. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and available for in-service) have been redacted as well insofar as these can be used to determine the contingency</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>amounts. The redacted information also includes specific variance amounts (variance breakdown) for projects. Variance amounts represent the difference between budgeted and actual costs that may arise as a result of changes to base assumptions, and can be used to determine contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts or percentage ranges are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts or percentage ranges can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingencies. As a result, disclosure of this information could significantly interfere with negotiations or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D1-AMPCO-015, Attachment 4	Page 3	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information relates to OPG's comments about vendors' performance. Or, in the case of Attachment 4, the redacted information references a vendor under a project, which when combined with other documents under this project refer directly to this and other vendors and their</p>
L-D1-AMPCO-015, Attachment 6	Pages 6-7			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D1-AMPCO-016, Attachment 1	Page 2			<p>performance (i.e., L-D1-AMPCO-013, Attachment 8), disclose the vendor's performance.</p> <p>The redacted information is commercially sensitive, and its public disclosure could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. More specifically, disclosure of positive vendor commentary could be leveraged by that vendor in future negotiations with the Applicants, to the Applicants' and the ratepayers' detriment. Disclosure of negative commentary could result in reputational harm for the vendor or could impact Applicants' relationships with these and other vendors, impairing the Applicants' bargaining position in the future. As a result, disclosure could damage the contractual relationship, prejudice the Applicants' and the vendor's competitive position in the market, and jeopardize current or future negotiations. Disclosure could also result in reputational harm for that vendor (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1,</p>
L-D1-AMPCO-016, Attachment 7	Page 1			
L-D1-AMPCO-016, Attachment 12	Page 3			
L-D1-AMPCO-016, Attachment 2	Pages 1, 7-9	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for a new project. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and other) have been redacted as well insofar as these can be used to determine the contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts are kept confidential from vendors as a means for OPG to</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>control project costs. Public disclosure of contingency amounts can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB previously determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D1-AMPCO-016, Attachment 6	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information consists of the name of a service provider for a project. The redacted information is commercially sensitive. It is kept confidential from competing vendors as a means for OPG to protect information about strategic sourcing decisions, proprietary technological choices, negotiations with vendors, and to control project costs.</p> <p>Public disclosure of a vendor's name that has been contracted or negotiated with for a particular project or type of work could be exploited by competing vendors as they will be guided to search for other available information about vendor's services and fees and therefore build a credible project vendor cost profile. Combined with the information about total project costs and scope of work, competing vendors could increase their bids to maximize profits in current or future negotiations with OPG or increase their bids in negotiations with a vendor already selected by OPG. As a result, disclosure could significantly interfere with negotiations and prejudice OPG's competitive</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				position to the detriment of OPG's cost efficiency efforts (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D1-SEC-053, Attachment 1	Pages 1, 5	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for new and ongoing projects. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and available for in-service) have been redacted as well insofar as these can be used to determine the contingency amounts. The redacted information also includes specific variance amounts (variance breakdown) for projects. Variance amounts represent the difference between budgeted and actual costs that may arise as a result of changes to base assumptions, and can be used to determine contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts or percentage ranges are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts or percentage ranges can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingencies. As a result, disclosure of this information could significantly interfere with negotiations or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated</p>
L-D1-SEC-053, Attachment 2	Pages 1, 7			
L-D1-Staff-066, Attachment 1	Pages 1, 6, 8			
L-D1-Staff-066, Attachment 2	Page 1			
L-D1-Staff-067	Page 2			
L-D1-Staff-068	Page 5			
L-D1-Staff-068, Attachment 1	Pages 1, 8, 10			
L-D1-Staff-316	Page 6			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).
L-D2-AMPCO-029, Attachment 3	Page 3	No	Confidential Treatment	<p><b>Commercially Sensitive Name of a Technology Provider:</b> The redacted information consists of the names of technology providers/vendors that OPG has contracted with for projects.</p> <p>The redacted information is commercially sensitive. It is kept confidential from competing vendors as a means for OPG to protect information about strategic sourcing decisions, proprietary technological choices, negotiations with vendors, and to control project costs.</p> <p>In addition, public disclosure of the redacted information could affect one of the vendors negatively because it concerns an OPG comment about that vendor's inability to perform and comparing it with another vendor. As a result, disclosure could damage the contractual relationship, prejudice the vendor and OPG's competitive position in the market, and jeopardize current or future negotiations. Disclosure could also result in reputational harm for vendors (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (see EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-033, Attachment 1	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of specific contingency amounts for a project, including contingency impact amount, cumulative (contingency) draw, released contingency remaining, drawdown/ impact (contingency) amount, and other contingency amounts, as well as variance amounts for specific</p>
L-D2-AMPCO-033, Attachment 2	Pages 2-3			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-AMPCO-033, Attachment 3	Pages 1-2			<p>projects. The contingency amount represents an allowance for discrete project risks or issues that may arise throughout the course of a project. The variance amount represents the difference between budgeted and actual costs that may arise as a result of changes to base assumptions. Confidential treatment is not being sought for other amounts.</p> <p>The redacted information is commercially sensitive. Contingency amounts and variance amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of the contingency and variance amounts will provide the vendors involved in a project with visibility into specific contingency and variance amounts associated with changes to baseline assumptions. This can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding including contingency. As a result, disclosure could significantly interfere with current or future negotiations, or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-033, Attachment 4	Pages 1-5			
L-D2-AMPCO-033, Attachment 5	Pages 1-2			
L-D2-AMPCO-033, Attachment 6	Pages 1-2, 4			
L-D2-AMPCO-033, Attachment 7	Pages 1-2			
L-D2-AMPCO-033, Attachment 8	Pages 1, 4-5			
L-D2-AMPCO-033, Attachment 9	Page 1, 4-5			
L-D2-AMPCO-033, Attachment 11	Pages 1, 3-4			
L-D2-AMPCO-033, Attachment 1	Page 1	No	Confidential Treatment	<b>Commercially Sensitive Project Information:</b> The redacted information consists of the names of service providers or vendors for

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-AMPCO-033, Attachment 2	Page 2			<p>specific projects (i.e., a vendor, OEM supplier, or service provider for a project).</p> <p>The redacted information is commercially sensitive. It is kept confidential from competing vendors as a means for OPG to protect information about strategic sourcing decisions, proprietary technological choices, negotiations with vendors, and to control project costs. Public disclosure of which vendor has been contracted or negotiated with for a particular project or type of work could be exploited by competing vendors, as they will be guided to search for other available information about vendor equipment, models, and prices, and therefore build a credible project vendor cost profile. Combined with the information about total project costs and scope of work, competing vendors could increase their bids to maximize profits in current or future negotiations with OPG or increase their bids in negotiations with a vendor already selected by OPG. As a result, disclosure could significantly interfere with negotiations and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-AMPCO-033, Attachment 4	Pages 1, 3			
L-D2-AMPCO-033, Attachment 5	Pages 1-2			
L-D2-AMPCO-033, Attachment 7	Pages 1-2			
L-D2-AMPCO-033, Attachment 8	Page 1			
L-D2-AMPCO-033, Attachment 9	Page 4-5			
L-D2-AMPCO-033, Attachment 10	Pages 1, 3			
L-D2-AMPCO-033, Attachment 11	Pages 1, 3-4			
L-D2-AMPCO-046, Attachment 1	Pages 1, 6	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for a new project. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and other) have been redacted as well insofar as these can be used to determine the contingency amounts. Confidential treatment is not being sought for the total project costs.</p>
L-D2-AMPCO-047, Attachment 1	Pages 1, 9			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>The redacted information is commercially sensitive. Contingency amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-050	Pages 1-2	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of a specific variance between actual costs and forecast costs, and unitized costs and variance per item for a project (i.e., Stator Rewind Cost for each Unit). Variance amounts represent the difference between budgeted and actual costs that may arise as a result of changes to base assumptions. Variance amounts show project costs including contingency allotted for releases of funds.</p> <p>The redacted information also consists of estimated costs for Gate 1, Gate 2, and future Gate 3 costs, as well as OPG and vendor costs. These amounts are not actuals but estimated amounts for project cost, the sum of which equals the assumed total project cost. The total cost assumptions at this stage only provide a preliminary estimate without the benefit of design completion. However, if such vendor's costs and OPG's costs were to be made public and compared with the total cost</p>
L-D2-AMPCO-050, Attachment 1	Pages 5, 8-9, 15			
L-D2-AMPCO-051, Attachment 1	Pages 7, 14, 22-23			
L-D2-AMPCO-052, Attachment 1	Pages 1, 10			
L-D2-AMPCO-052, Attachment 2	Pages 17, 19-20, 22-24,			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
	26-28, 31-32, 35-37			<p>in the business case summary for the project, the difference would show the contingency amount for this project.</p> <p>Contingency amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of information that could be used to determine contingency amounts, and disclosure of contingency amounts, can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-050, Attachment 1	Pages 10-11	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of vendor's inspection, construction, commissioning, and close out costs, as well as overheads, profit, and cost benchmarking. The redacted information is commercially sensitive. It shows significant elements in the vendor pricing model, such as overheads and profit.</p> <p>Public disclosure of this information could provide an insight into key items in the vendor's pricing model, and more generally vendor's management accounting, to its competitors and current or future clients. This information could be used as an artificial benchmark in future negotiations, reducing vendor's flexibility to negotiate more favorable terms and will prejudice that vendor's competitive position. As</p>
L-D2-AMPCO-051, Attachment 1	Pages 12, 15-18, 20			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>a result, disclosure could significantly interfere with negotiations by allowing future counterparties to the vendor to adjust their pricing, risk sharing, or negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice vendor's competitive position. Disclosure could be substantially prejudicial to the vendor as it would allow its competitors to infer information about their contracts with OPG, which could be used unfairly against the vendor (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p>Furthermore, disclosure could significantly interfere with future negotiations between OPG and the vendor. This could prejudice OPG's competitive position and significantly interfere with its negotiations in future like contracts (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information concerning vendor pricing, labour rates, profit and overhead levels and unit pricing should be treated confidentially (EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 13-14; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-050, Attachment 1	Pages 9, 11	Yes	Confidential Treatment	<p><b>Unit Pricing and Billing Rates and Fees of a Third Party:</b> The redacted information consists of the unit pricing of a third-party supplier expressed with reference to another unit price, and information that can be used to determine the billing rates of a third-party supplier. Billing rate information is commercially sensitive and presumptively confidential. Unit pricing information and billing rates are commercially sensitive information and presumptively confidential.</p> <p>Public disclosure of this information could prejudice the economic interest and competitive position of the vendor in any future negotiations for the provision of similar materials. Disclosure would be substantially prejudicial to the vendor as it would allow its competitors to infer information about its contracts with OPG, which could be used unfairly against the vendor. Further, it would prejudice OPG's competitive position and significantly interfere with its negotiations in future contracts. (Practice Direction, Appendix B, Part 1).</p>
L-D2-AMPCO-052, Attachment 2	Pages 18, 25			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p><b>Previous Treatment:</b> The OEB has previously determined that information that relates to third party vendor unit pricing should be subject to confidential treatment (EB-2025-0014, Decision on Confidentiality and Procedural Order No. 6, dated November 11, 2025, at pp. 1-2; EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 13-14, 20-21; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-052, Attachment 2	Pages 38-40	No	Confidential Treatment	<p><b>Commercially Sensitive Third-Party Information:</b> The redacted information consists of references to vendor source documents. This information is commercially sensitive third-party information. It shows the document structure of vendor’s proposal, document dates and revisions.</p> <p>Public disclosure of this information could prejudice the economic interest and competitive position of the vendor as it would provide the vendor’s competitors with insights into the negotiations between OPG and that vendor by allowing future counterparties to OPG or the vendor to adjust their bids or negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice vendor’s competitive position. As a result, disclosure could be substantially prejudicial to the vendor as it would allow its competitors to infer information about their contracts with OPG, which could be used unfairly against the vendor (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p>Furthermore, disclosure could significantly interfere with the current contractual relationship between OPG and the vendor, and future negotiations between OPG and the vendor. This could affect negatively OPG’s competitive position and significantly interfere with its negotiations in future like contracts (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-AMPCO-055, Attachment 8	Pages 3-4	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information relates to OPG’s comments about vendor’s performance.</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>The redacted information, when combined with other publicly available information about the vendor, becomes commercially sensitive.</p> <p>The redacted information is commercially sensitive, and its public disclosure could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. More specifically, disclosure of positive vendor commentary could be leveraged by that vendor in future negotiations with the Applicants, to the Applicants' and the ratepayers' detriment. Disclosure of negative commentary could result in reputational harm for the vendor or could impact Applicants' relationships with these and other vendors, impairing the Applicants' bargaining position in the future. As a result, disclosure could damage the contractual relationship, prejudice the Applicants' and the vendor's competitive position in the market, and jeopardize current or future negotiations. Disclosure could also result in reputational harm for that vendor (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-082, Attachment 1	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information relates to the scheduling for various elements of Units 2-4 of the Darlington New Nuclear Project ("DNNP"). The Applicants are currently in the process of negotiating the definitive agreements for Units 2-4 with contractors.</p> <p>Public disclosure of this information would prejudice those ongoing negotiations. Disclosure may compromise the ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants'</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>ability to secure greater value for the ratepayers. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved confidential treatment for substantially the same scheduling information, noting that confidential treatment is appropriate for future unit information, as public disclosure could prejudice ongoing negotiations for Units 2-4 and cause competitive harm (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-AMPCO-088, Attachment 7	Pages 22-23	n/a	Permanent Redaction for Non-Relevance	<p><b>Non-Relevant Phone Numbers:</b> The information consists of the phone numbers of OPG and other employees included in the DNNP Grid Connection Project Management Plan. This information is not relevant and it will not assist intervenors or the OEB with any of the issues to be decided as part of this proceeding (Practice Direction, Part 11).</p>
L-D2-AMPCO-088, Attachment 12	Page 22, 46-48	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information consists of co-mingled financial and procurement information relating to Units 1-4 of the Darlington New Nuclear Project.</p> <p>Disclosure of this information could prejudice to ongoing and future negotiations, and result in competitive prejudice. The Applicants are currently in the process of negotiating the definitive agreements for Units 2-4 with contractors, and public disclosure of this information would prejudice those negotiations. Disclosure may compromise the ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants' ability to secure greater value for the ratepayers. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved confidential treatment for similar Unit 2-4 information, noting that confidential treatment is appropriate for future unit information, as public disclosure could prejudice ongoing negotiations for Units 2-4 and cause competitive harm. The Applicants respectfully submit that this rationale applies equally to comingled Unit 1-4 information (EB-2025-</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15; see also Practice Direction, Appendix A, Part (e)).
L-D2-AMPCO-088, Attachment 12	Page 28	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information includes the detailed contingency waterfall for Unit 1 of DNNP. This includes granular forecasted variance amounts for work not yet contracted.</p> <p>Variance amounts, which show project costs including contingency allotted for new releases of funds, are kept confidential from vendors as a means for the Applicants and Non-Owner Parties to control project costs. Public disclosure of this information could signal to vendors that additional budget may be available could significantly interfere with bids, negotiations, and/or claim disputes, and prejudice the Applicants' and Non-Owner Parties' competitive position to the detriment of their cost efficiency efforts and ultimately the contract price, all of which would be detrimental to the ratepayer as well.</p> <p>More generally, this contingency and forecast information, even on the project level, is consistently treated in a confidential manner by the Applicants and Non-Owner Parties because of the first-of-a-kind nature of the project, and the expectation that lessons learned in Unit 1 will be translated into efficiencies and savings in Units 2-4. The Applicants are currently in the process of negotiating the definitive agreements for Units 2-4 and disclosure of this information may compromise the ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants' ability to secure greater value for the ratepayers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved confidential treatment for information that, if publicly disclosed, could prejudice ongoing negotiations for Units 2-4 and cause competitive harm (see: EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-CCC-048, Attachment 1, RFBR Agreement Main Body	Pages 7-8, 14-15, 17, 19, 22-23, 26, 29, 57, 59-60, 80-81, 82-84, 87-91, 94, 96, 100, 113-114, 116, 120, 134-135, 138-139, 140-143, 147, 149, 152	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information refers to a non-standard contracting model and includes select provisions drawn from such model that are specific to this project.</p> <p>Public disclosure of this information would reveal OPG's and vendor's contracting strategy and specific commercial terms that are particular to this project. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and(iii)).</p>
L-D2-CCC-048, Attachment 1, RFBR Agreement Main Body	Pages 7, 15, 22, 23, 28, 43, 120-127, 130-131, 146	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of intellectual property contractual provisions that allocate ownership, use, access, licensing, restrictions, and protection of intellectual property and related proprietary materials. These provisions are not generic boilerplate terms. They reflect the negotiated commercial positions of the parties and their respective contributions, rights, restrictions, and risk allocation.</p> <p>Disclosure of this information would provide third parties, including future counterparties and competitors, with insight into OPG's and vendor's negotiating thresholds, their approach to protecting and sharing proprietary information, and the circumstances in which they may grant or retain rights in commercially valuable intellectual property. This information could be used as a benchmark in future negotiations, reducing OPG's and/or vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				vendor's competitive positions. (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D2-CCC-048, Attachment 1, RFBR Agreement Main Body	Pages 17, 19, 22, 26, 83-85, 87-88, 94-98, 100-104, 111-112, 113, 133	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to rework percentages, markups, incentive and disincentive caps, liquidated damages, letters of credit amounts, and the tangible net worth of an acceptable guarantor.</p> <p>The redacted incentive/disincentive caps are commercially sensitive. Public disclosure of these caps could allow counterparties to optimize their bids or project execution strategies, undermining the effectiveness of performance-based mechanisms. Incentive and disincentive caps set limits on financial exposures related to performance. If disclosed, contractors or vendors may adjust their pricing, risk-sharing, or negotiation strategies to maximize their benefit or minimize their exposure, eroding competitiveness and potentially increasing costs. Additionally, public knowledge of these caps could set informal benchmarks in the market, undermining the ability of OPG and the vendor to negotiate the best possible terms in future contracts (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>The redacted information of rework percentages, markups, liquidated damages, letters of credit amounts, and the tangible net worth of an acceptable guarantor are also commercially sensitive. Public disclosure of this information will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5) (Practice Direction, Appendix A, Part (e)).
L-D2-CCC-048, Attachment 1, RFBR Agreement Main Body	Pages 22, 32-33, 41, 44, 61, 76-77, 77-78, 79, 117-119, 120, 131, 133, 139, 147	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding allocation of commercial, financial, and operational risk, including performance and participation commitments, cost responsibilities and reimbursement mechanisms, administrative fees, liability limits, delay, compensation, and warranty periods. These terms reflect the parties' negotiated positions for a specific project.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds, risk tolerances, and pricing expectations. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 1, RFBR Agreement Main Body	Pages 59, 92, 153	No	Confidential Treatment	<b>Confidential Non-Public Third-Party Information:</b> The redacted information consists of (i) the vendor's Workplace Safety and Insurance Board registration number, (ii) the vendor's tax registration number, and (ii) the purchase order number of the agreement.

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p><b>Previous Treatment:</b> The confidential nature of this information was approved by the OEB in previous OPG proceedings (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 5-21	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of non-public personnel-level labour and cost information, including the names of specific personnel, the hours attributed to those personnel, and the associated Work Breakdown Structure cost categories. This information reveals labour deployment, staffing, cost-allocation, and project execution information at an individual level.</p> <p>Public disclosure of this information could prejudice the contractor's competitive position, interfere with current or future negotiations, and result in undue loss to the contractor or third parties (Practice Direction, Appendix A, Part (a)(i) and (iii)). When combined with other project or contract information, the redacted information could allow third parties to infer labour rates, staffing assumptions and project resourcing strategy, and cost of the work. As a result, disclosure could allow competitors, subcontractors, or future counterparties to benchmark or reverse-engineer the contractor's labour pricing, undercut its bids, or use the disclosed information as an anchor in future negotiations.</p> <p><b>Previous Treatment:</b> The OEB has previously accepted that information on costs for contractor for purchased work or materials, aggregate information and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 25-26, 1200-1204, 1207-1762	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted exhibits consist of milestones, milestone-date information, and pricing. The milestones and associated dates form part of the negotiated project delivery framework, and reveal the parties' sequencing of the work, delivery commitments, timing sensitivities, and cost and schedule allocation under the agreement.</p> <p>Public disclosure of this information would provide third parties, including contractors and other counterparties, with insight into OPG's and the vendor's project execution strategy, scheduling assumptions, performance expectations, and commercial thresholds. This information could be used to benchmark future proposals and assess schedule leverage (Practice Direction, Appendix A, Part (a)(iii)).</p> <p>Additionally, disclosure of this information would expose the order and interdependence of the work to other contractors working on the project site, creating a risk of operational interference, disruption, or strategic behaviour by other contractors working on or around the project site which could impede or diminish the capacity of OPG or the vendor to fulfill their contractual obligations (Practice Direction, Appendix A, Part (a)(ii)).</p> <p>The vendor has also advised that this information is proprietary to it and forms part of its project execution methodology and scheduling approach. Disclosure could prejudice the vendor's competitive position by allowing competitors and counterparties to replicate or benchmark its delivery strategy in the future (Practice Direction, Appendix A, Part (a)(i)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to milestone schedules/exhibits on the basis that it could be detrimental to commercial interests (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 5 and 9; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 687-688	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding payroll burdens.</p> <p>The redacted percentages are commercially sensitive. Public disclosure of this exhibit will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's negotiating thresholds. This information would create an artificial benchmark that could be leveraged in future negotiations and procurements, constraining OPG's negotiating flexibility. This would prejudice OPG's competitive position in future negotiations to the detriment of OPG and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Page 690-888	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted exhibit is the detailed scope of work containing non-public, project-specific information regarding how the work is to be performed and delivered.</p> <p>Public disclosure of this information would provide contractors, suppliers, and competitors with insight into the project delivery approach and execution methodology. This information could be used to benchmark, replicate, or calibrate bids and negotiation strategies, including in ways that could undercut or otherwise distort competition involving OPG and/or the vendor. As a result, disclosure could prejudice the competitive position of OPG and the vendor and could reasonably be expected to significantly interfere with current or future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 1038-1064	No	Confidential Treatment	<p><b>Public Security and Competitive Prejudice:</b> The redacted information contains various site drawings of the Pickering power plant.</p> <p>Public disclosure of this information would raise public security and safety concerns by revealing sensitive infrastructure details concerning the Pickering nuclear site which could cause significant loss to OPG</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>and the wider public if provided to threat actors (Practice Direction, Appendix A, Part (a)(iv) and (c)).</p> <p>The drawings are also OPG's proprietary technical and engineering information. Public disclosure could allow third parties to understand, replicate, or misuse this information, thereby prejudicing OPG's competitive position and could cause significant loss (Practice Direction, Appendix A, Part (a)(i) and (iv)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 1084, 1813	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information refers to a non-standard contracting model and includes select provisions drawn from such model that are specific to this project.</p> <p>Public disclosure of this information would reveal OPG's and vendor's contracting strategy and specific commercial terms that are particular to this project. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and(iii)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 1085, 1770, 1777-1778, 1783-1787, 1804-1811, 1812, 1825-1826, 1848-1850, 1852-1853, 1858, 1861	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms and figures negotiated between OPG and its vendor regarding allocation of commercial, financial, and operational risk. These terms were heavily negotiated by the parties and reflect negotiated positions and commercial compromises.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds, risk</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>tolerances, pricing expectations, and willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor’s flexibility to negotiate more favourable terms and will prejudice OPG or vendor’s competitive position in future negotiations.</p> <p>As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their pricing, risk sharing, or negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG’s or vendor’s competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Page 1192-1199	No	Confidential Treatment	<p><b>Sensitive Cybersecurity Information:</b> The redacted information is the cyber security exhibit containing cybersecurity requirements, controls, protocols, responsibilities, escalation expectations, information-handling requirements, system/interface obligations, and compliance mechanisms applicable to the project.</p> <p>Public disclosure of this information will reveal sensitive cybersecurity arrangements that are particular to this project and could provide threat actors with insight into OPG’s cybersecurity posture, thereby increasing cybersecurity risk which may result in significant loss to OPG and the ratepayers. This concern is particularly acute given the nature of the facility whereby work is being done (Practice Direction, Appendix A, Part (a)(iv) and (c)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to cyber protocols in accordance with Appendix A, Part (c) of the Practice Direction (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, August 25, 2025, at pp. 7; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 1788-1789	No	Confidential Treatment	<p><b>Sensitive Financial Information:</b> The redacted information is a non-public, project specific and forward-looking cash flow forecast consisting of commercial and financial information relating to a project currently in execution.</p> <p>Public disclosure of this information will provide contractors and counterparties within the market with insight on cost categories, total forecast costs, annual cost allocations and forecasted risk and rework costs. This information can be used to benchmark pricing or assess OPG's sensitivity to cost escalation, risk, or rework during the specific years of project execution. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to cost flow exhibits on the basis that it could be detrimental to commercial interests (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 5 and 9; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Pages 1793	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of a pricing breakdown of the project, including amounts for different phases of the project and markup percentages.</p> <p>Public disclosure of these markup percentages and vendor pricing breakdown will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and vendor's willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor's flexibility to negotiate more favourable terms and will prejudice OPG or vendor's competitive position in future negotiations. As a result, disclosure could significantly</p>

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				<p>interfere with negotiations by allowing future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure which, in turn, would significantly prejudice OPG's or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously accepted that information on costs for contractor for purchased work or materials, aggregate information and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14). The OEB has specifically granted confidentiality to pricing schedules/exhibits in the past (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 5-6; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Page 1794 - 1796	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to rework percentages, overhead and profit percentages, and markups.</p> <p>Public disclosure of these rework percentages, overhead and profit percentages and markups will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor's flexibility to negotiate more favourable terms and will prejudice OPG's or vendor's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure. This will significantly prejudice OPG or vendor's competitive position and could result in significant</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>loss to OPG and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has accepted that information on costs for contractor for purchased work or materials, aggregate information, and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 2, RFBR Agreement Schedules	Page 1797	No	Confidential Treatment	<p><b>Confidential Non-Public Third-Party Information:</b> The redacted information consists of the vendor’s banking information.</p> <p><b>Previous Treatment:</b> The OEB has previously found banking information to be confidential (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016, at pp.10-11; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 3, 7, 11, 62, 64, 73, 76, 82, 90-91, 901-906, 922-923, 925-938, 951-955, 958-969, 1034-1035, 1037-1038	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to markups, overhead and profit percentages, incentive and disincentive caps, performance risk allocation and remedies, insurance amounts, and letter of credit amounts.</p> <p>The redacted incentive/disincentive caps are commercially sensitive. Public disclosure of these caps could allow counterparties to optimize their bids or project execution strategies, undermining the effectiveness of performance-based mechanisms. Incentive and disincentive caps set limits on financial exposures related to performance. If disclosed, contractors or vendors may adjust their pricing, risk-sharing, or negotiation strategies to maximize their benefit or minimize their exposure, eroding competitiveness and potentially increasing costs. Additionally, public knowledge of these caps could set informal</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>benchmarks in the market, undermining the ability of OPG and the vendor to negotiate the best possible terms in future contracts (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>The redacted information regarding markups, overhead and profit percentages, certain performance risk allocation and remedies, insurance amounts, and letters of credit amounts, are commercially sensitive. Public disclosure of this information will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 32, 83, 117, 716, 758, 878-879, 884, 897, 908, 910, 1024, 1030, 1039	No	Confidential Treatment	<p><b>Confidential Non-Public Third-Party Information:</b> The redacted information consists of (i) the vendor's Workplace Safety and Insurance Board registration number, (ii) the vendor's tax registration number, and (ii) the purchase order number or contract number of the agreement.</p> <p><b>Previous Treatment:</b> The OEB has previously found this type of information to be confidential (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 13-14, 18-19, 23-24, 42, 45, 65-67, 69-70, 74-75, 78, 82, 85-88, 90-91, 96-97, 99, 102, 797, 799-800, 802, 804-805, 863, 865, 913-918, 942, 947-949, 977, 982-984, 1010-1011, 1022-1033, 1047	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding allocation of commercial, financial, and operational risk, including participation commitments, cost responsibilities and reimbursement mechanisms, termination rights and fees, liability limits, default events, delay, compensation, and warranty periods. These terms reflect the parties' negotiated positions for a specific project.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and that vendor's negotiating thresholds, risk tolerances, and pricing expectations. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 102-104	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of intellectual property contractual provisions that allocate ownership, use, access, licensing, restrictions, and protection of intellectual property and related proprietary materials. These provisions are not generic boilerplate terms. They reflect the negotiated commercial positions of the parties and their respective contributions, rights, restrictions, and risk allocation.</p> <p>The redacted information is commercially sensitive. Disclosure of this information would provide third parties, including future counterparties and competitors, with insight into OPG's and vendor's negotiating thresholds, their approach to protecting and sharing proprietary</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				information, and the circumstances in which it may grant or retain rights in commercially valuable intellectual property. This information could be used as a benchmark in future negotiations, reducing OPG's and/or vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 123-285	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information consists of a detailed scope of work containing non-public, project-specific information regarding how the work is to be performed and delivered.</p> <p>Public disclosure of this information would provide contractors, suppliers, and competitors with insight into the project delivery approach and execution methodology. This information could be used to benchmark, replicate, or calibrate bids and negotiation strategies, including in ways that could undercut or otherwise distort competition involving OPG and/or the vendor. As a result, disclosure could prejudice the competitive position of OPG and the vendor and could reasonably be expected to significantly interfere with current or future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 288-668	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of the vendor's proposal documents.</p> <p>The redacted information is commercially sensitive. Disclosure of this information would reveal sensitive non-public pricing, commercial, and technical information of the vendor that was used in its request for proposal. Third parties can use this information to benchmark or undercut the vendor's approach in future procurements. Future customers of the vendor could also use the disclosed information as an anchor in negotiations, limiting the vendor's ability to negotiate different commercial, pricing, and technical terms. Disclosure could therefore</p>

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				<p>prejudice the vendor’s competitive position and interfere with future negotiations (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>Disclosure of this information could also prejudice OPG by weakening future competitive procurements. If future counterparties know their sensitive bid/proposal information may become public, they will be less willing to provide aggressive pricing or commercially sensitive assumptions or may price the risk of disclosure into future bids. This could reduce competitive tension and result in increased costs or less favourable terms for OPG (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 673-704	No	Confidential Treatment	<p><b>Sensitive Third-Party Information:</b> The redacted information consists of the vendor’s organizational charts.</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to organization chart exhibits (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016. At pp. 9-10) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 747-749	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information identifies subcontractors and describes the goods, services, or work assigned to them under the contract.</p> <p>This information is commercially sensitive. Public disclosure of this information would allow contractors, competitors, and future bidders to determine which subcontractors are being used for particular scopes. This information could be used to replicate, target, or disrupt OPG’s or the vendor’s supply-chain strategy in future procurements or negotiations. As a result, disclosure could prejudice OPG’s or the vendor’s competitive position and potentially interfere with future negotiations (Practice Direction, Appendix A, Part a(i) and (iii)).</p>

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L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 761-765, 769-772, 807, 811-858	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information consists of milestones, milestone-date information, and pricing. The milestones and associated dates form part of the negotiated project delivery framework, and reveal the parties' sequencing of the work, delivery commitments, timing sensitivities, and cost and schedule allocation under the agreement.</p> <p>Public disclosure of this information would provide third parties, including contractors and other counterparties, with insight into OPG's and the vendor's project execution strategy, scheduling assumptions, performance expectations, and commercial thresholds. This information could be used to benchmark future proposals and assess schedule leverage (Practice Direction, Appendix A, Part (a)(iii)).</p> <p>Additionally, disclosure of this information would expose the order and interdependence of the work to other contractors working on the project site. This would create a risk of operational interference, disruption, or strategic behaviour by other contractors working on or around the project site which could impede or diminish the capacity of OPG or the vendor to fulfill their contractual obligations (Practice Direction, Appendix A, Part (a)(ii)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to milestone and pricing schedules/exhibits on the basis that it could be detrimental to commercial interests (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 5 and 9) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Pages 793, 808-809	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information is a risk register containing project-specific information regarding identified risks, assessed likelihood and consequences, and mitigation strategies.</p> <p>The redacted information is commercially sensitive. Public disclosure would provide contractors, counterparties, and bidders with insight into OPG's perceived vulnerabilities. The confidentiality concern is</p>

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				<p>heightened because the project is currently in execution. Disclosure of live risk information could reveal anticipated vulnerabilities, mitigation gaps, and areas where OPG may be exposed to delay, cost escalation, or contractor claims. This could prejudice OPG's competitive position and interfere with current or future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to risk registers on the basis that it could reveal security vulnerabilities/risks or prejudice the applicant in ongoing or future negotiations. (EB-2022-0200, Decision on Confidentiality, September 1, 2023, at pp. 2) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 3, DWI Agreement	Page 970	No	Confidential Treatment	<p><b>Sensitive Financial Information:</b> The redacted information is a non-public, project specific and forward-looking cash flow forecast consisting of commercial and financial information relating to a project currently in execution.</p> <p>This information is commercially sensitive financial information. Public disclosure of this information will provide contractors and counterparties within the market with insight on cost categories, total forecast costs, annual cost allocations and forecasted risk and rework costs. This information can be used to benchmark pricing or assess OPG's sensitivity to cost escalation, risk, or rework during project execution. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to cost flow schedules on the basis that it could be detrimental to commercial interests (EB-2016-0152, Decision and Order on</p>

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				Confidentiality, January 31, 2017, at pp. 5 and 9) (Practice Direction, Appendix A, Part (e)).
L-D2-CCC-048, Attachment 3, DWI Agreement	971-973	No	Confidential Treatment	<p><b>Sensitive Labour Information:</b> The redacted information is a list of hourly labour rates along with the total base rate per month.</p> <p><b>Previous Treatment:</b> The OEB has accepted that information on costs for contractor for purchased work or materials, aggregate information and other third-party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 4, TG Agreement Main Body	Pages 13, 19, 21-22, 125-128, 133	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of intellectual property contractual provisions that allocate ownership, use, access, licensing, restrictions, and protection of intellectual property and related proprietary materials. These provisions are not generic boilerplate terms. They reflect the negotiated commercial positions of the parties and their respective contributions, rights, restrictions, and risk allocation.</p> <p>Disclosure of this information would provide third parties, including future counterparties and competitors, with insight into OPG's and vendor's negotiating thresholds, their approach to protecting and sharing proprietary information, and the circumstances in which they may grant or retain rights in commercially valuable intellectual property. This information could be used as a benchmark in future negotiations, reducing OPG's and/or vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the</p>

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				vendor's competitive positions. (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D2-CCC-048, Attachment 4, TG Agreement Main Body	Pages 20, 30, 33, 35, 46, 68-69, 70, 78, 86-88, 89-91, 94, 99, 119, 122-124, 135, 140, 141-142, 147, 149-151, 153-156	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding allocation of commercial, financial, and operational risk, including performance and participation commitments, cost responsibilities and reimbursement mechanisms, fees, timeframes, liability limits, delay, compensation, and warranty periods. These terms reflect the parties' negotiated positions for a specific project.</p> <p>Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds, risk tolerances, and pricing expectations. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 4, TG Agreement Main Body	Pages 93, 102, 103-113, 116-117, 120, 147-149	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to rework percentages, markups, incentive and disincentive caps, liquidated damages, letters of credit amounts, and the tangible net worth of an acceptable guarantor.</p> <p>The redacted incentive/disincentive caps are commercially sensitive. Public disclosure of these caps could allow counterparties to optimize their bids or project execution strategies, undermining the effectiveness of performance-based mechanisms. Incentive and disincentive caps set limits on financial exposures related to performance. If disclosed, contractors or vendors may adjust their pricing, risk-sharing, or negotiation strategies to maximize their benefit or minimize their</p>

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				<p>exposure, eroding competitiveness and potentially increasing costs. Additionally, public knowledge of these caps could set informal benchmarks in the market, undermining the ability of OPG and the vendor to negotiate the best possible terms in future contracts (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>The redacted information of rework percentages, markups, liquidated damages, letters of credit amounts, and the tangible net worth of an acceptable guarantor are also commercially sensitive. Public disclosure of this information will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 4, TG Agreement Main Body	Pages 66, 101	No	Confidential Treatment	<p><b>Confidential Non-Public Third-Party Information:</b> The redacted information consists of (i) the vendor's Workplace Safety and Insurance Board registration number, and (ii) the vendor's tax registration number</p> <p><b>Previous Treatment:</b> The OEB has previously found that information of this nature was confidential (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 5 - 9	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of the associated Work Breakdown Structure work package description.</p> <p>Public disclosure of this information would reveal labour deployment and staffing. When combined with other project or contract information, the redacted information could allow third parties to infer labour rates, staffing assumptions and project resourcing strategy, and cost of the work. As a result, disclosure could allow competitors, subcontractors, or future counterparties to benchmark or reverse-engineer the contractor's labour pricing, undercut its bids, or use the disclosed information as an anchor in future negotiations. Disclosure could therefore prejudice the contractor's competitive position, interfere with current or future negotiations, and result in undue loss to the contractor or third parties (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously accepted that information on costs for contractor for purchased work or materials, aggregate information and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 75-77	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information refers to a non-standard purchase order structure that is specific to this project.</p> <p>Public disclosure of this information would reveal OPG's and vendor's non-standard purchase order structure particular to this project. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could</p>

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				significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and(iii)).
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Page 78	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding payroll burdens.</p> <p>The redacted percentages are commercially sensitive. Public disclosure of this exhibit will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's negotiating thresholds. This information would create an artificial benchmark that could be leveraged in future negotiations and procurements, constraining OPG's negotiating flexibility. This would prejudice OPG's competitive position in future negotiations to the detriment of OPG and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 85, 341, 375, 380, 387, 396-397, 400, 416, 464, 631-642, 660-667, 668-674, 675-680, 693-694, 729	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms and figures negotiated between OPG and its vendor regarding allocation of commercial, financial, and operational risk, including, but not limited to, manufacturing lead time dates, liability, termination fees, and warranty periods. These terms were heavily negotiated by the parties and reflect negotiated positions and commercial compromises.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds, risk tolerances, and pricing expectations. This information could be used as an artificial benchmark in future negotiations, reducing OPG's or</p>

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				<p>vendor's flexibility to negotiate more favourable terms and will prejudice OPG or vendor's competitive position in future negotiations.</p> <p>As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their pricing, risk sharing, or negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG's or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	225-251	No	Confidential Treatment	<p><b>Public Security and Competitive Prejudice:</b> The redacted information contains various site drawings of the Pickering power plant.</p> <p>Public disclosure of this information would raise public security and safety concerns by revealing sensitive infrastructure details concerning the Pickering nuclear site which could cause significant loss to OPG and the wider public if provided to threat actors (Practice Direction, Appendix A, Part (a)(iv) and (c)).</p> <p>The drawings are also OPG's proprietary technical and engineering information. Public disclosure could allow third parties to understand, replicate, or misuse this information, thereby prejudicing OPG's competitive position and could cause significant loss (Practice Direction, Appendix A, Part (a)(i) and (iv)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 380, 431, 644-645	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to rework percentages, overhead and profit percentages, and markups.</p> <p>The redacted information is commercially sensitive. Public disclosure of these rework percentages, overhead and profit percentages and markups will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor's flexibility to negotiate more</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>favourable terms and will prejudice OPG's or vendor's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure. This will significantly prejudice OPG or vendor's competitive position and could result in significant loss to OPG and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously accepted that information on costs for contractor for purchased work or materials, aggregate information, and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 376-378, 421, 703-709, 724-728, 730, 776-778	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to incentive and disincentive caps and models, performance risk allocation and remedies, insurance amounts, and letter of credit amounts.</p> <p>The redacted incentive/disincentive caps and models are commercially sensitive. Public disclosure of these caps or models could allow counterparties to optimize their bids or project execution strategies, undermining the effectiveness of performance-based mechanisms. Incentive and disincentive caps and models set limits on financial exposures related to performance. If disclosed, contractors or vendors may adjust their pricing, risk-sharing, or negotiation strategies to maximize their benefit or minimize their exposure, eroding competitiveness and potentially increasing costs. Additionally, public knowledge of these caps or models could set informal benchmarks in the market, undermining the ability of OPG and the vendor to negotiate</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>the best possible terms in future contracts (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>The redacted information regarding certain performance risk allocation and remedies, insurance amounts, and letters of credit amounts, are commercially sensitive. Public disclosure of this information will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 378-380, 391, 395-396	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of intellectual property contractual provisions that allocate ownership, use, access, licensing, restrictions, and protection of intellectual property and related proprietary materials. These provisions are not generic boilerplate terms. They reflect the negotiated commercial positions of the parties and their respective contributions, rights, restrictions, and risk allocation.</p> <p>The redacted information is commercially sensitive. Disclosure of this information would provide third parties, including future counterparties and competitors, with insight into OPG's and vendor's negotiating thresholds, their approach to protecting and sharing proprietary</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				information, and the circumstances in which it may grant or retain rights in commercially valuable intellectual property. This information could be used as a benchmark in future negotiations, reducing OPG's and/or vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 401-414, 429-431, 437-452, 454-455, 460-462, 502-608, 647-657	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted exhibits consist of milestones, milestone-dates, milestone payments, and milestone payment schedules. The milestones and associated dates form part of the negotiated project delivery framework, and reveal the parties' sequencing of the work, delivery commitments, timing sensitivities, and cost and schedule allocation under the agreement.</p> <p>Public disclosure of this information would provide third parties, including contractors and other counterparties, with insight into OPG's and the vendor's project execution strategy, scheduling assumptions, performance expectations, and commercial thresholds. This information could be used to benchmark future proposals and assess schedule leverage (Practice Direction, Appendix A, Part (a)(iii)).</p> <p>Additionally, disclosure of this information would expose the order and interdependence of the work to other contractors working on the project site, creating a risk of operational interference, disruption, or strategic behaviour by other contractors working on or around the project site which could impede or diminish the capacity of OPG or the vendor to fulfill their contractual obligations (Practice Direction, Appendix A, Part (a)(ii)).</p> <p>The vendor has also advised that this information is proprietary to it and forms part of its project execution methodology and scheduling approach. Disclosure could prejudice the vendor's competitive position</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>by allowing competitors and counterparties to replicate or benchmark its delivery strategy in the future (Practice Direction, Appendix A, Part (a)(i)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to milestone schedules/exhibits on the basis that it could be detrimental to commercial interests (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 5 and 9) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 432-434, 457, 658	No	Confidential Treatment	<p><b>Sensitive Labour Information:</b> The redacted information is a list of hourly labour rates along with the total base rate per month.</p> <p><b>Previous Treatment:</b> The OEB has accepted that information on costs for contractor for purchased work or materials, aggregate information and other third-party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 435, 453-454, 456, 459, 643, 646	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of pricing and pricing breakdowns of the project, including amounts for different phases of the project and markup percentages.</p> <p>Public disclosure of vendor pricing and pricing breakdowns will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and vendor's willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor's flexibility to negotiate more favourable terms and will prejudice OPG or vendor's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure which, in turn, would significantly prejudice OPG's or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously accepted that information on costs for contractor for purchased work or materials, aggregate information and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14). The OEB has specifically granted confidentiality to pricing schedules/exhibits in the past (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 5-6) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Page 489	Yes	Confidential Labour-Sensitive Treatment	<p><b>Labour Sensitive Information:</b> The redacted information is labour-relations sensitive, and is presumptively confidential because it could impact current or future collective bargaining negotiations and OPG's collective bargaining strategies (Practice Directions, Appendix B, Part 8).</p> <p>Public disclosure could adversely impact and influence the outcome of future collective bargaining, conferring an unfair advantage on the unions and insight into OPG's commercial dealings. It could also unfairly influence third party arbitrators. As a result, disclosure could diminish OPG's leverage, and OPG's bargaining capital.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that underpinning assumptions that a labour-sensitive, or information that relates to collective bargaining strategies, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality –</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				Pre-Filed Evidence, dated April 13, 2021, at pp. 4-6; EB-2016-0152, Decision on Confidentiality, dated May 4, 2017 at p. 2; EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 14-16) (Practice Direction, Appendix A, Part (e)).
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 493-499	No	Confidential Treatment	<p><b>Sensitive Cybersecurity Information:</b> The redacted information is the cyber security exhibit containing cybersecurity requirements, controls, protocols, responsibilities, escalation expectations, information-handling requirements, system/interface obligations, and compliance mechanisms applicable to the project.</p> <p>Public disclosure of this information will reveal sensitive cybersecurity arrangements that are particular to this project and could provide threat actors with insight into OPG's cybersecurity posture, thereby increasing cybersecurity risk which may result in significant loss to OPG and the ratepayers. This concern is particularly acute given the nature of the facility whereby work is being done (Practice Direction, Appendix A, Part (a)(iv) and (c)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to cyber protocols in accordance with Appendix A, Part (c) of the Practice Direction (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, August 25, 2025, at pp. 7) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Page 627	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information is a risk register containing project-specific information regarding identified risks, assessed likelihood and consequences, and mitigation strategies.</p> <p>Public disclosure would provide contractors, counterparties, and bidders with insight into OPG's perceived vulnerabilities. The confidentiality concern is heightened because the project is currently in execution. Disclosure of live risk information could reveal anticipated vulnerabilities, mitigation gaps, and areas where OPG may be exposed to delay, cost escalation, or contractor claims. This could prejudice</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>OPG's competitive position and interfere with current or future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to risk registers on the basis that it could reveal security vulnerabilities/risks or prejudice the applicant in ongoing or future negotiations. (EB-2022-0200, Decision on Confidentiality, September 1, 2023, at pp. 2) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 5, TG Agreement Exhibits	Pages 779-782	No	Confidential Treatment	<p><b>Public Security and Competitive Prejudice:</b> The redacted information contains various site drawings of heat power diagram that is proprietary to the vendor</p> <p>Public disclosure of this information would raise public security and safety concerns by revealing sensitive details which could cause significant loss to OPG, the vendor, and the wider public if provided to threat actors (Practice Direction, Appendix A, Part (a)(iv) and (c)).</p> <p>The drawings are also the vendor's proprietary technical and engineering information. Public disclosure could allow third parties to understand, replicate, or misuse this information, thereby prejudicing the vendor's competitive position and could cause significant loss (Practice Direction, Appendix A, Part (a)(i) and (iv)).</p>
L-D2-CCC-048, Attachment 5.1, TG Agreement Scope of Work Exhibit	All	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted exhibit is the detailed scope of work containing non-public, project-specific information regarding how the work is to be performed and delivered.</p> <p>Public disclosure of this information would provide contractors, suppliers, and competitors with insight into the project delivery approach and execution methodology. This information could be used to benchmark, replicate, or calibrate bids and negotiation strategies, including in ways that could undercut or otherwise distort competition involving OPG and/or the vendor. As a result, disclosure could prejudice the competitive position of OPG and the vendor and could</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				reasonably be expected to significantly interfere with current or future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D2-CCC-048, Attachment 6, Aecon ESMSA	Pages 49-53	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of intellectual property contractual provisions that allocate ownership, use, access, licensing, restrictions, and protection of intellectual property and related proprietary materials. These provisions are not generic boilerplate terms. They reflect the negotiated commercial positions of the parties and their respective contributions, rights, restrictions, and risk allocation.</p> <p>Disclosure of this information would provide third parties, including future counterparties and competitors, with insight into OPG's and vendor's negotiating thresholds, their approach to protecting and sharing proprietary information, and the circumstances in which they may grant or retain rights in commercially valuable intellectual property. This information could be used as a benchmark in future negotiations, reducing OPG's and/or vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-CCC-048, Attachment 6, Aecon ESMSA	Pages 31, 66-67, 68, 73, 96-97, 130, 135, 166, 171, 180, 187, 189, 199, 221, 226, 237-238, 247, 273,	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding allocation of commercial, financial, and operational risk, including, but not limited to, terminations fees, liability limits, compensation, and warranty periods. These terms reflect the parties' negotiated positions for a specific project.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds, risk</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
	278, 290, 292, 452, 454, 455, 457, 459, 460, 495-496			tolerances, and pricing expectations. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).
L-D2-CCC-048, Attachment 6, Aecon ESMSA	Pages 11, 15, 62-63, 76-78, 86, 134, 170, 186, 198, 225, 246, 277, 470-472, 475-480	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to rework percentages, overhead and profit percentages, markups, fees, incentive and disincentive caps, liquidated damages, letters of credit amounts, and insurance amounts.</p> <p>The redacted incentive/disincentive caps are commercially sensitive. Public disclosure of these caps could allow counterparties to optimize their bids or project execution strategies, undermining the effectiveness of performance-based mechanisms. Incentive and disincentive caps set limits on financial exposures related to performance. If disclosed, contractors or vendors may adjust their pricing, risk-sharing, or negotiation strategies to maximize their benefit or minimize their exposure, eroding competitiveness and potentially increasing costs. Additionally, public knowledge of these caps could set informal benchmarks in the market, undermining the ability of OPG and the vendor to negotiate the best possible terms in future contracts (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>The redacted information regarding rework percentages, markups, overhead and profit percentages, fees, letters of credit amounts, and insurance amounts are also commercially sensitive. Public disclosure of this information will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 6, Aecon ESMSA	Pages 47, 87	No	Confidential Treatment	<p><b>Confidential Non-Public Third-Party Information:</b> The redacted information consists of (i) the vendor's Workplace Safety and Insurance Board registration number, and (ii) the vendor's tax registration number</p> <p><b>Previous Treatment:</b> The confidential nature of this information was approved by the OEB in previous OPG proceedings (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-CCC-048, Attachment 6, Aecon ESMSA	Pages 305-318	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted exhibit is the detailed scope of work containing non-public, project-specific information regarding how the work is to be performed and delivered.</p> <p>Public disclosure of this information would provide contractors, suppliers, and competitors with insight into the project delivery approach and execution methodology. This information could be used to benchmark, replicate, or calibrate bids and negotiation strategies, including in ways that could undercut or otherwise distort competition involving OPG and/or the vendor. As a result, disclosure could prejudice the competitive position of OPG and the vendor and could</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				reasonably be expected to significantly interfere with current or future negotiations (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-D2-CCC-048, Attachment 6, Aecon ESMSA	Pages 326-327, 360-361	No	Confidential Treatment	<p><b>Sensitive Labour Information:</b> The redacted information is the labour cost table schedule and the reimbursable labour costs for trades personnel schedule.</p> <p><b>Previous Treatment:</b> The OEB has previously accepted that information on costs for contractor for purchased work or materials, aggregate information and other third-party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14). The OEB has previously granted confidentiality to OPG's ESMSA Reimbursable Labour Cost Table schedule and the Reimbursable Labour Costs for Trades Personnel schedule (EB-2016-0152, Decision on Confidential Filings, February 23, 2017, at p. 2; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-ED-008, Attachments 9	All	No	Confidential Treatment	<p><b>Third-Party Proprietary Information that is Commercially Sensitive:</b> The redacted information, contained in Customer Field Service Reports, consists of a third party's technical material relating to asset inspections. OPG has been advised by the third-party author of this document that the entire document is commercially sensitive, as it reveals the third-party's proprietary technology and methodology pertaining to asset inspections that consists of trade secrets (Practice Direction, Appendix A, Part B).</p> <p>The public disclosure of this information would prejudice the third-party's commercial interests and competitive position and undermine its ability to carry on offering business services, as it would allow its</p>
L-D2-ED-008, Attachment 10	All			
L-D2-ED-008, Attachment 11	All			
L-D2-ED-008, Attachment 12	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-ED-008, Attachment 13	All			competitors and other service providers to ascertain the proprietary and sensitive aspects of its methodology (Practice Direction, Appendix A, Part (a)(i),(iv)). In addition, the third-party provided OPG with the relevant records on the basis that OPG does not publicly disclose them (Practice Direction, Appendix A, Part (a)(ii)).
L-D2-ED-008, Attachment 15	All			
L-D2-ED-008, Attachment 16	All			
L-D2-ED-008, Attachment 17	All			
L-D2-ED-008, Attachment 18	All			
L-D2-SEC-064, Attachment 1	Pages 3, 9	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information relates to vendor/contractor performance in Refurbishment Construction Review Board and Internal Audit Reports in connection with the Darlington Refurbishment Program.</p> <p>This information is commercially sensitive, and its public disclosure could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. More specifically, disclosure of positive vendor commentary could be leveraged by that vendor in future negotiations with the Applicants, to the Applicants' and the ratepayers' detriment. Disclosure of negative commentary could result in reputational harm for the vendor or could impact Applicants' relationships with these and other vendors, impairing the Applicants' bargaining position in the future. As a result, disclosure could damage the contractual relationship, prejudice the Applicants' and the vendor's competitive position in the market, and jeopardize current or future</p>
L-D2-SEC-064, Attachment 2	Pages 4-6, 8, 10			
L-D2-SEC-064, Attachment 3	Pages 3, 9			
L-D2-SEC-064, Attachment 4	Pages 2-3, 7			
L-D2-SEC-064, Attachment 5	Pages 4, 9			
L-D2-SEC-064, Attachment 6	Pages 2-3, 6-7			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-SEC-064, Attachment 7	Pages 2-5			<p>negotiations. Disclosure could also result in reputational harm for that vendor (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved. (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.4). In addition, the OEB has previously treated as confidential similar information sought to be redacted. (EB-2020-0290, Decision on Confidentiality, June 8, 2021 at p.5; EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-064, Attachment 8	Pages 3-6, 9			
L-D2-SEC-064, Attachment 9	Pages 3-4			
L-D2-SEC-064, Attachment 10	Page 3, 5			
L-D2-SEC-064, Attachment 11	Pages 4-6			
L-D2-SEC-064, Attachment 14	Pages 10-11			
L-D2-SEC-064, Attachment 4	Page 12	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information includes commentary and assumptions made by OPG about the impact that inflation may have on certain specific contracts and business costs. This information is commercially sensitive because the Applicants would be prejudiced in future negotiations if these details were publicly available to potential counterparties.</p> <p>Public disclosure of these terms will provide future counterparties with insight into the Applicants' views and assumptions on inflationary impacts, which would impact their commercial positions. This information could be leveraged against the Applicants in future negotiations to the detriment of the parties and ratepayers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-SEC-064, Attachment 4	Pages 11-12	Yes	Confidential Labour-	<p><b>Information Related to Collective Bargaining:</b> The redacted information consists of information related to collective bargaining negotiations, including inflation and operational matters, and is labour-relations sensitive. Disclosure of this information could prejudice OPG's</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
			Sensitive Treatment	position in future rounds of collective bargaining. This information is presumptively confidential pursuant to the Practice Direction (Practice Direction, Appendix B, Part 8).
L-D2-SEC-064, Attachment 21	Pages 70-71	n/a	Permanent Redaction for Personal Information	<b>Personal Information:</b> The redacted information includes (i) information relating to the employment history of several individuals, and (ii) information relating to financial transactions in which individuals have been involved. This information is personal information as defined in the <i>Freedom of Information and Protection of Privacy Act</i> ("FIPPA"), R.S.O. 1990, c. F.31, s. 2(1). (Practice Direction, Part 10; Rules of Practice and Procedure, Rule 9).
L-D2-SEC-074, Attachment 1	Pages 3, 5	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for a project. The redacted information also includes the vendor's request-for-proposal pricing and OPG's internal contingency, in aggregate. If disclosed, the vendor could derive OPG's internal contingency for the project by subtracting the vendor's proposal price (already known to the vendor) from the disclosed aggregate amount. OPG's contingency represents an allowance for discrete project risks and other issues that may arise over the course of the project. Other amounts have been redacted insofar as these can be used to determine the contingency amounts.</p> <p>The redacted information is commercially sensitive. Contingency amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claims disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Directions, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB y determined that information related to contingency amounts and other information that</p>
L-D2-SEC-074, Attachment 2	Page 4			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, March 21, 2014, at pp. 3-5) (Practice Direction, Appendix A, Part (e)).
L-D2-SEC-074, Attachment 1	Pages 4, 8	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of amounts and schedule information reflecting competitively bid and project specific commercial information. For Attachment 1, this information includes the definition phase amount, the target amount for the execution phase, the anticipated execution phase start date, and the expected duration of that phase for the project. For Attachment 2, this information includes the hardware fixed price, definition phase cost, and the execution phase estimate. For Attachment 3, this information includes specific schedule information, notably the anticipated contract closeout date and the expected duration of the project.</p> <p>The redacted information is commercially sensitive, as it would reveal OPG's and the successful proponent's non-public costs and schedule assumptions for a phase that has not yet commenced and for which final costs have not been fixed. Third parties can use this information to benchmark pricing and scheduling or undercut the proponent's approach in future procurements. Future customers of the proponent could also use the disclosed values as an anchor in negotiations, limiting the proponent's ability to negotiate different pricing or schedules based on project-specific risks. Disclosure could therefore prejudice the successful proponent's competitive position and interfere with future negotiations (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>Disclosure of this information could also prejudice OPG by weakening future competitive procurements. If proponents know their successful bid costs and schedule commitments may become public, they will be less willing to provide aggressive pricing, scheduling or commercially</p>
L-D2-SEC-074, Attachment 2	Pages 3, 11			
L-D2-SEC-074, Attachment 3	Page 10			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>sensitive assumptions, or may price the risk of disclosure into future bids. This could reduce competitive tension and result in increased costs or less favourable terms for OPG (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has accepted that information on costs for contractor for purchased work or materials, aggregate information and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-074, Attachment 1	Page 6 -7	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to incentive/disincentive caps and other commercial risk allocation considerations. Incentive and disincentive caps set limits on financial exposures related to performance.</p> <p>If disclosed, contractors or vendors may adjust their pricing, risk-sharing, or negotiation strategies to maximize their benefit or minimize their exposure, eroding OPG and the vendor’s competitiveness and potentially increasing costs. Additionally, public knowledge of these caps could set informal benchmarks in the market, undermining the ability of OPG and the vendor to negotiate the best possible terms in future contracts. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p>In addition, the contract associated with this attachment was awarded via a competitive procurement process. Disclosing such commercial information could result in future proponents in other procurements tailoring their bids to meet or exploit disclosed thresholds and risk allocations, reducing OPG’s competitiveness and potentially increasing costs for ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p>
L-D2-SEC-074, Attachment 2	Pages 5-8			
L-D2-SEC-074. Attachment 3	Pages 3, 4-7			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p><b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-074, Attachment 2	Page 9	Yes	Confidential Labour-Sensitive Treatment and Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information in the first grey box consists of commercially sensitive labour pricing margin information. The redacted information is commercially sensitive and labour sensitive as it reflects the contractor's negotiated margin applied to union hours. Disclosure of labour markups is presumptively confidential because it could impact and influence the outcome of future collective bargaining strategies, conferring an unfair advantage on the unions and insight into OPG's commercial strategies</p> <p>In addition, disclosure of this information could allow competitors, customers, subcontractors, or future counterparties to benchmark or reverse-engineer the contractor's labour pricing, undercut its bids, or use the disclosed percentage as an anchor in future negotiations. Disclosure could therefore prejudice the contractor's competitive position, interfere with current or future negotiations, and result in undue loss to the contractor or third parties (Practice Direction, Appendix A, Part (a)(iii)).</p> <p>Disclosure of this information could also prejudice OPG by weakening future competitive procurements. If future counterparties know their markups or margins may become public, they may be less willing to provide aggressive pricing or commercially sensitive assumptions or may price the risk of disclosure into future bids. This could reduce competitive tension and result in increased costs or less favourable terms for OPG (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has accepted that information on costs for contractor for purchased work or materials, aggregate information</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part(e)).
L-D2-SEC-074, Attachment 2	Pages 9-10	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive percentages negotiated between OPG and its vendors regarding target and stretch percentages for indigenous commitment, apprenticeship, and women in trades spend, investment tax credit liability, performance guarantees, and risk allocations for tariff costs. The redacted information also relates to rework percentages, overhead and profit percentages, and markups.</p> <p>The redacted percentages are commercially sensitive. Public disclosure of these percentages will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing OPG or vendor's flexibility to negotiate terms and will prejudice OPG or vendor's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has accepted that information on costs for contractor for purchased work or materials, aggregate information and other third party related information (such as vendor pricing, labour rates, profit and overhead levels, project cost contingencies, discount rates and unit pricing under contracts) is of a commercially sensitive</p>
L-D2-SEC-074, Attachment 3	Pages 8, 12			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				nature and that public disclosure of this information could be detrimental to OPG and/or relevant parties (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 14) (Practice Direction, Appendix A, Part (e)).
L-D2-SEC-074. Attachment 3	Page 3	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of commercially sensitive contractual terms negotiated between OPG and its vendor regarding the amount of overhead and profit at risk.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties within the market with insight into OPG's and the vendor's negotiating thresholds and risk tolerances. This information could be used as an artificial benchmark in future negotiations, reducing OPG's or vendor's flexibility to negotiate more favourable terms and will prejudice OPG's or vendor's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their pricing, risk sharing, or negotiation strategies to maximize their benefit or minimize their exposure which, in turn, will significantly prejudice OPG or vendor's competitive position to the detriment of OPG or the vendor and the ratepayers (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that revealing numbers relating to risks, rewards, and continuous improvements could be detrimental to commercial interests, and as such, should be subject to confidential treatment (EB-2016-0152, Decision and Order on Confidentiality, January 31, 2017, at pp. 4-5) (Practice Direction, Appendix A, Part(e)).</p>
L-D2-SEC-074. Attachment 3	Page 9	No	Confidential Treatment	<b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information refers to a non-standard contracting model and

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>includes select provisions drawn from such model that are specific to this project.</p> <p>Public disclosure of this information would reveal OPG's and vendor's contracting strategy and specific commercial terms that are particular to this project. This information could be used as an artificial benchmark in future negotiations, reducing OPG's and/or the vendor's flexibility to negotiate terms based on project requirements. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's and/or the vendor's competitive positions. (Practice Direction, Appendix A, Part(a)(i) and(iii)).</p>
L-D2-SEC-075, Attachment 1	Pages 1-4	No	Confidential Treatment	<p><b>Sensitive Commercial Information:</b> The redacted information consists of third-party bid information, scoring, comparative assessment, and evaluative commentary of proponents for a specific project.</p> <p>The redacted information is commercially sensitive. Public disclosure of the comparative assessment and evaluative commentary of the proponents could prejudice the competitive positions of those proponents and could also give rise to adverse impacts on existing relationships that OPG has with the parties or on relationships those parties have with others (Practice Direction, Appendix A, Part(a)(i)).</p> <p>Additionally, the redacted information consists of the bid/proposal information of the proponents. Disclosure of this information would reveal sensitive non-public pricing, commercial, and technical information of each proponent. Third parties can use this information to benchmark or undercut the proponent's approach in future procurements. Future customers of the proponent could also use the disclosed information as an anchor in negotiations, limiting the proponent's ability to negotiate different commercial, pricing, and technical terms. Disclosure could therefore prejudice a proponent's</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>competitive position and interfere with future negotiations (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p>Disclosure of this information could also prejudice OPG by weakening future competitive procurements. If future counterparties know their sensitive bid/proposal information may become public, they will be less willing to provide aggressive pricing or commercially sensitive assumptions or may price the risk of disclosure into future bids. This could reduce competitive tension and result in increased costs or less favourable terms for OPG (Practice Direction, Appendix A, Part(a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information in relation to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (see EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-094, Attachment 2	Pages 1-4	n/a	Permanent Redaction for Personal Information	<p><b>Personal Information:</b> The redacted information includes (i) information relating to the education and employment history of several individuals, and (ii) information relating to financial transactions in which individuals have been involved. This information is personal information as defined in the <i>Freedom of Information and Protection of Privacy Act</i> ("FIPPA"), R.S.O. 1990, c. F.31, s. 2(1) (Practice Direction, Part 10; Rules of Practice and Procedure, Rule 9).</p>
L-D2-SEC-104, Attachment 2	All	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of a summary of the Validation Amendment to the Integrated Project Agreement ("IPA"). The Validation Amendment and summary of the amendment are the Applicants' commercial/financial information that they and their counterparties have consistently treated in a confidential manner.</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>The Validation Amendment is a commercially sensitive document that reveals details about how the Applicants are deploying the Integrated Project Delivery (“IPD”) model in a first-of-a-kind SMR context. The summary of the Amendment includes commercially sensitive details such as modifications to terms of the IPA, new or modified commitments that the parties have undertaken, and updates to how the IPA now operationalizes the IPD model in the SMR context. If the Validation Amendment summary were disclosed, it would harm OPG’s competitive position (Practice Direction, Appendix A, Part a(i)).</p> <p>Despite this sensitivity, the Applicants recognize the importance of providing information about this Amendment to the public. Thus, in Exhibit D2-04-01, the Applicants explain that the Amendment: (1) added Kiewit Nuclear Canada Corp. to the IPA to assist with construction of the facility and (2) finalized the Target Cost, pricing and compensation details, and the incentive/disincentive mechanisms to drive “best for project” behaviours by the parties. The Applicants also disclosed information about the Validation Amendment through its inclusion of Howard W. Ashcraft’s September 2025 opinion (Exhibit D2-4-2, Attachment 2). Any incremental benefits of further disclosure about the Amendment do not outweigh the competitive harms from disclosing more granular details about the Amendment in the summary.</p> <p><b>Impact on Future Negotiations:</b> If the Validation Amendment summary were disclosed, it would also harm OPG’s negotiations on future units of DNNP position (Practice Direction, Appendix A, Part a(iii)). Negotiations regarding Units 2-4 of DNNP have not been completed, so disclosing the Validation Amendment summary could harm OPG’s position in negotiations for the remaining three units at the DNNP site.</p> <p><b>Previous Treatment.</b> In this proceeding, the OEB concluded that a summary of the IPA included in the pre-filed evidence qualified for confidential treatment. It did so pursuant to Appendix A, Part (a)(i) (competitive position) and Appendix A, Part (a)(iii) (interfere with negotiations) (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.10). Because the OEB has</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>treated the IPA summary as confidential, a summary of an amendment to the IPA should also qualify for confidential treatment.</p> <p>In addition, the Amendment summary reflects proprietary and novel approaches to nuclear power generation of the sort that the OEB has recognized should be protected (EB-2024-0115, Decision on Confidentiality, November 3, 2025, at p. 4; Decision on Confidentiality, April 13, 2026, pp. 9-10).</p>
L-D2-SEC-107	Pages 1-2	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of a summary of the Technology Collaboration Agreement (“TCA”). If the TCA summary were disclosed, it would harm OPG’s competitive position (Practice Direction, Appendix A, Part a(i)).</p> <p>The TCA is the primary agreement for development of the BWRX-300 Standard Plant Design. The TCA is highly sensitive because it provides the contractual framework for developing the design of a SMR that will be delivered through the Integrated Project Delivery (“IPD”) model. Because DNNP is a first of a kind project, no global competitor in the SMR market knows how OPG and GE-Hitachi have collaborated to develop this plant design. Thus, the TCA operationalizes a proprietary and novel approach to SMR design development for the first time.</p> <p>Despite this sensitivity, the Applicants recognize the importance of providing information about the TCA to the public given its key role in DNNP and the IPA. Exhibits D2-04-03 and D2-04-04 explain the general framework of the TCA, how the parties work together under the TCA (through the Design Center Working Group), and how the TCA facilitates early engagement by OPG into Standard Plant Design. Any incremental benefits of further disclosure about the TCA do not outweigh the competitive harms from disclosing more granular details about the TCA in the summary.</p> <p><b>Impact on Future Negotiations:</b> If the TCA summary is made public, it would interfere with ongoing negotiations about DNNP and on other nuclear projects (Practice Direction, Appendix A, Part a(iii)). The Applicants are working with the TCA counterparties on DNNP execution. If the TCA summary is revealed, any compromises that</p>
L-D2-SEC-107, Attachment 1	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>OPG’s counterparties made in the TCA will become public, which would impair OPG’s relationship with those parties and impair their future negotiating position on the remaining units of DNNP and other projects.</p> <p><b>Third Party Commercially Sensitive Information:</b> The TCA summary also includes sensitive financial information about how costs are shared in developing the Standard Plant Design. Because the TCA summary describes how costs are shared in developing the Standard Plant Design, its public disclosure could prejudice the competitive position of OPG’s counterparties.</p> <p>This cost sharing mechanism would act as a baseline in future agreements, impairing the counterparties’ ability to negotiate agreements with other customers. As a result, disclosure of this commercially sensitive information could prejudice the competitive positions of the TCA counterparties, interfere with their future negotiations, and may produce a significant loss to them. (Practice Direction, Appendix B, Parts 1 and 2; Practice Direction, Appendix A, Parts (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment.</b> In this proceeding, the OEB concluded that a summary of the Integrated Project Agreement (“IPA”) included in the pre-filed evidence qualified for confidential treatment. It did so pursuant to Appendix A, Part (a)(i) (competitive position) and Appendix A, Part (a)(iii) (interfere with negotiations). (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.10). Because the TCA is closely related to the IPA, the summary of the TCA should also qualify for confidential treatment. As the pre-filed evidence explains, the roles and responsibilities in the TCA are recognized in the IPA, which forms part of the overall scope of the IPA (see Exhibit D2-04-03, p. 3).</p>
L-D2-SEC-110, Attachment 1	Pages 5, 7, 16-21	No	Confidential Treatment	<p><b>Confidential Third-Party Information:</b> The redacted information includes non-public lessons learned from several identifiable nuclear construction projects and developers and from major construction project participants. The information identifies commercial, operational, and technical information of identifiable third parties, that was provided to the Applicants by Modus for the purpose of creating an inventory of</p>
L-D2-SEC-110, Attachment 3	Pages 1, 3-42, 44-46,			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
	48-55, 57-58, 60-63, 65-66, 68, 70-74			<p>lessons learned from the industry and past nuclear construction projects to support the DNNP program.</p> <p>There are few parties with first-hand knowledge of this type of information, and the ability to share it with peers in a confidential manner for benchmarking and lessons learned purposes is valuable and in the public interest. The Applicants submit that it is in the interest of the Applicants, ratepayers, and the broader public interest for the OEB to incentivize the exchange of shared experience and knowledge among the parties involved in nuclear construction projects in a free and open manner, which would be at risk if the OEB compelled disclosure of non-public information like that included in this attachment in a manner that identified the participants (Practice Direction, Appendix A, Part a(iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously approved confidential treatment for certain information in order to enable the anonymity of the third-parties in the context of benchmarking studies. The identifying information associated with the non-public lessons learned should be redacted on the same basis (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 6, 2024, at p. 7; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-110, Attachment 1	Pages 12-14	n/a	Permanent Redaction for Personal Information	<p><b>Personal Information:</b> The redacted information includes information relating to the education and employment history of several individuals. This information is personal information as defined in the <i>Freedom of Information and Protection of Privacy Act</i> ("FIPPA"), R.S.O. 1990, c. F.31, s. 2(1) (Practice Direction, Part 10; Rules of Practice and Procedure, Rule 9).</p>
L-D2-SEC-115, Attachment 1	Page 3	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information relates to the procurement strategy for various elements of Units 2-4 of the Darlington New Nuclear Project, relates to project performance, and consists of co-mingled financial and procurement information relating to Units 1-4 of the Darlington New Nuclear Project.</p>
L-D2-SEC-115, Attachment 2	Pages 9-10, 12-17, 31-32, 40, 42			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-SEC-115, Attachment 3	Page 3			<p>This information is commercially sensitive and its public disclosure could prejudice ongoing and future negotiations. The Applicants are currently in the process of negotiating the definitive agreements for Units 2-4 with contractors. Disclosure of this information may compromise the Applicants' ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants' ability to secure greater value for the ratepayers. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved confidential treatment for similar Unit 2-4 information, noting that confidential treatment is appropriate for future unit information, as public disclosure could prejudice ongoing negotiations for Units 2-4 and cause competitive harm (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-115, Attachment 2	Page 20	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information includes the detailed contingency waterfall for Unit 1 of DNNP. This includes granular forecasted variance amounts for work not yet contracted.</p> <p>Variance amounts, which show project costs including contingency allotted for new releases of funds, are kept confidential from vendors as a means for the Applicants and Non-Owner Parties to control project costs. Public disclosure of this information could signal to vendors that additional budget may be available could significantly interfere with bids, negotiations, and/or claim disputes, and prejudice the Applicants' and Non-Owner Parties' competitive position to the detriment of their cost efficiency efforts and ultimately the contract price, all of which would be detrimental to the ratepayer as well.</p> <p>More generally, this contingency and forecast information, even on the project level, is consistently treated in a confidential manner by the Applicants and Non-Owner Parties because of the first-of-a-kind nature of the project, and the expectation that lessons learned in Unit 1 will be translated into efficiencies and savings in Units 2-4. The Applicants are currently in the process of negotiating the definitive agreements for</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>Units 2-4 and disclosure of this information may compromise the ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants' ability to secure greater value for the ratepayers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved confidential treatment for information that, if publicly disclosed, could prejudice ongoing negotiations for Units 2-4 and cause competitive harm (see: EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-SEC-115, Attachment 3	Pages 2, 11	No	Confidential Treatment	<p><b>Commercially Sensitive Project Information:</b> The redacted information relates to OPG's commentary about a vendor's performance.</p> <p>Public disclosure of this information could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. More specifically, disclosure of positive vendor commentary could be leveraged by that vendor in future negotiations with the Applicants, to the Applicants' and the ratepayers' detriment. Disclosure of negative commentary could result in reputational harm for the vendor or could impact Applicants' relationships with these and other vendors, impairing the Applicants' bargaining position in the future. As a result, disclosure could damage the contractual relationship, prejudice the Applicants' and the vendor's competitive position in the market, and jeopardize current or future negotiations. Disclosure could also result in reputational harm for that vendor (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (EB-2016-0152, Decision on Confidential Filings and</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				Procedural Order No 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).
L-D2-SEC-115, Attachment 3	Pages 3, 12	No	Confidential Treatment	<p><b>Commercially Sensitive Information About Ongoing Negotiations:</b> This redacted information contains non-public details of ongoing discussions between the Applicants and various counterparties, including information regarding status and timing of potential future deliverables.</p> <p>The status of these discussions directly impact other agreements, arrangements, and negotiations of the Applicants relating to the facility. If this information is made public, third-parties involved in these agreements, arrangements or negotiations may leverage it to their advantage, to the detriment of the counterparties, the Applicants, and ratepayers. More broadly, the confidentiality of the status of these discussions is required to ensure that external factors do not cause unwanted third-party disruption which would otherwise not exist, and which may significantly interfere with the progress of the discussions. (Practice Direction, Appendix A, Part (a)(i), (ii), (iii)).</p>
L-D2-SEC-116, Attachment 14	Page 1-4	n/a	Permanent Redaction for Personal Information	<p><b>Personal Information:</b> The redacted information includes (i) information relating to the race, national or ethnic origin of an individual, (ii) information relating to the education and employment history of several individuals, and (iii) information relating to financial transactions in which individuals have been involved. This information is personal information as defined in the <i>Freedom of Information and Protection of Privacy Act</i> (“FIPPA”), R.S.O. 1990, c. F.31, s. 2(1), (Practice Direction, Part 10; Rules of Practice and Procedure, Rule 9).</p>
L-D2-SEC-117, Attachment 1	All	No	Confidential Treatment	<p><b>Commercially Sensitive and Proprietary Information:</b> The redacted information consists of reports generated directly from the DNNP working schedule, which is a working-level project management tool. The reports provide detailed breakdowns of the critical path activities for DNNP and granular information about individual steps in the</p>
L-D2-SEC-117, Attachment 2	All			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-SEC-117, Attachment 3	All			<p>schedule. OPG has consistently treated this technical information in a confidential manner.</p> <p>Public disclosure of this information would harm OPG and its DNNP partners' competitive positions (Practice Direction, Appendix A, Part a(i)). DNNP will be the first nuclear project to deploy an Integrated Project Delivery ("IPD") model for adapting this delivery model to SMR technology. OPG is therefore in the lead to develop this technology, but at least five other companies in North America and Europe have announced plans to develop an SMR.</p> <p>Disclosure of the redacted information would provide details about how OPG and its DNNP partners are executing the critical path activities of the project and implementing the early parts of its schedule at a very granular level. OPG and its partners' competitors could use these reports as a starting point for their SMR development planning, giving them an unfair advantage that OPG and its partners did not have and harming OPG's and its partners' first-mover standing in the market.</p> <p>The Applicants recognize, however, that the overall schedule of the project is important information in the Application that should be made public. The Applicants have thus provided significant amounts of schedule-related information in the pre-filed evidence (Exhibit D2-04-06). The Applicants have also explained the nature of the Attachments in their IR response and provided a summary of the current validated performance of DNNP at L-D2-AMPCO-086. Any incremental benefits of publicly disclosing the granular schedule details in the Attachments do not outweigh the competitive harms from disclosure.</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB accepted that the DNNP project agreement was "highly sensitive as the first future project to deploy an integrated projected delivery model" and because it is the "contractual 'roadmap'" revealing the delivery model. The OEB also recognized the "need for redactions to DNNP information" given DNNP's early stage. The redacted information is similar and warrants similar confidential treatment. (EB-2025-0297, Decision and Order on Confidentiality–Pre-Filed Evidence, April 13, 2026, at p.10, 16).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				In addition, the redacted information also reflects proprietary and novel approaches to SMR deployment. The information reveals the roadmap for building an SMR at various stages and in great detail. The OEB has recognized in past decisions that proprietary approaches should be protected (EB-2024-0115, Decision on Confidentiality, November 3, 2025, at p. 4; Decision on Confidentiality, April 13, 2026, pp. 9-10).
L-D2-Staff-089	Page 3	No	Confidential Treatment	<p><b>Competitive Prejudice and Impact on Future Negotiations:</b> The redacted information consists of facility-specific commercial and technical operating information. It includes cumulative throughput performance, recent average throughput performance, and annual throughput volumes of the Tritium Removal Facility (“TRF”).</p> <p>Public disclosure of this information would allow market participants, counterparties, competitors to assess the facility’s operating reliability, production trend, and available capacity. When combined with other market information, this information could permit third parties to infer the TRF’s production profile and operational constraints. Disclosure of this information could therefore prejudice OPG’s competitive position, interfere with current or future negotiations, and result in less favourable commercial terms or increased costs on OPG and ratepayers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-D2-Staff-092, Attachment 1	Pages 1, 6	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for new and ongoing projects. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and available for in-service) have been redacted as well insofar as these can be used to determine the contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts or percentage ranges are kept confidential from vendors as a</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>means for OPG to control project costs. Public disclosure of contingency amounts or percentage ranges can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingencies. As a result, disclosure of this information could significantly interfere with negotiations or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; see also EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-Staff-092, Attachment 1	Page 2	No	Confidential Treatment	<p><b>Commercially Sensitive Name of a Technology Provider:</b> The redacted information consists of the names of technology providers/vendors that OPG has contracted with for projects.</p> <p>The redacted information is commercially sensitive. It is kept confidential from competing vendors as a means for OPG to protect information about strategic sourcing decisions, proprietary technological choices, negotiations with vendors, and to control project costs.</p> <p>In addition, public disclosure of the redacted information could affect one of the vendors negatively because it concerns an OPG comment about that vendor's inability to perform and comparing it with another vendor. As a result, disclosure could damage the contractual relationship, prejudice the vendor and OPG's competitive position in the market, and jeopardize current or future negotiations. Disclosure could</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>also result in reputational harm for vendors (Practice Direction, Appendix A, Part (a)(i), (iii) and (iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to vendors' performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved (see EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D2-Staff-117, Attachment 2	Pages 14, 15, 23-30, 32-42, 49-50, 76, 79-80, 86, 94, 97-98, 104-110, 130	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information relates to financial and scheduling information for Units 2-4 of the Darlington New Nuclear Project.</p> <p>This information is commercially sensitive and its public disclosure could prejudice ongoing and future negotiations. The Applicants are currently in the process of negotiating the definitive agreements for Units 2-4 with contractors. Disclosure of this information may compromise the Applicants' ability to negotiate competitive pricing for Units 2-4, which would impede the Applicants' ability to secure greater value for the ratepayers. (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved confidential treatment for similar Unit 2-4 information, noting that confidential treatment is appropriate for future unit information, as public disclosure could prejudice ongoing negotiations for Units 2-4 and cause competitive harm (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.15) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-Staff-118, Attachment 1	Pages 4, 7, 13-16, 20-21, 23, 26-27, 49-50, 52, 56-57, 64, 66-67			
L-D2-Staff-117, Attachment 2	Pages 33, 35-40	n/a	Permanent Redaction for Non-Relevance	<p><b>Non-Relevant Superseded Estimate:</b> The redacted information shows and comments on the differences between the Class 3 estimate, and a previous Class 4 estimate. The Class 4 estimate has been superseded by the Class 3 estimate and therefore is not relevant to any</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				issue in this proceeding. While the charts include both Class 3 and Class 4 data, in each case, the Class 3 data in the permanently redacted charts is available in an immediately adjacent chart which has been provided on a confidential basis for the reasons set out above. Accordingly, no relevant information is impacted by these permanent redactions (Practice Direction, Part 11).
L-D2-Staff-117, Attachment 2	Page 130	No	Confidential Treatment	<p><b>Third-Party Commercially Sensitive Information:</b> The redacted information relates to non-public benchmarking information received by the Applicants in relation to two major international nuclear projects. This information identifies confidential, commercially sensitive information of identifiable third-parties associated with the projects, and was provided to the Applicants for the purpose of benchmarking the DNNP.</p> <p>There are few parties with first-hand knowledge of this type of information, and the ability to share it with peers in a confidential manner for benchmarking and lessons learned purposes is valuable and in the public interest. The Applicants submit that it is in the interest of the Applicants, ratepayers, and the broader public interest for the OEB to incentivize the exchange of shared experience and knowledge among the parties involved in these types of projects in a free and open manner, which would be at risk if the OEB compelled disclosure of non-public information like that included in this attachment in a manner that identified the participants (Practice Direction, Appendix A, Part A(iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously approved confidential treatment for certain information in order to enable the anonymity of the third-parties in the context of benchmarking studies (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 6, 2024, at p. 7) (Practice Direction, Appendix A, Part (e)).</p>
L-D2-Staff-118, Attachment 1	Page 18	No	Confidential Treatment	<p><b>Third-Party Commercially Sensitive Information:</b> The redacted information identifies the value at risk amounts negotiated by the parties to DNNP. These terms are not standard and reflect the parties' negotiated positions and commercial compromises in the context of a first-mover project. The redacted information is the Applicants'</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>commercial/financial information that has consistently been treated in a confidential manner.</p> <p>These terms are commercially sensitive. Public disclosure of these contractual terms will provide other contractors, suppliers, competitors, and future counterparties with insight into the parties' negotiating thresholds, risk tolerances, pricing expectations, and willingness to accept particular commercial positions. This information could be used as an artificial benchmark in future negotiations, reducing the parties' flexibility to negotiate more favorable terms and will prejudice the parties' competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their pricing, risk sharing, or negotiation strategies to the detriment of the Applicants, counterparties, and ratepayers (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Impact on Future Negotiations:</b> If the redacted information were to be made public, it would also interfere with ongoing negotiations about DNNP and on other nuclear projects (Practice Direction, Appendix A, Part a(iii)). Any compromises that OPG's counterparties made regarding key commercial terms or otherwise will become public, which would impair OPG's relationship with those parties as they negotiate agreements for the remaining units of DNNP and for other projects. Disclosure of this confidential information would also make it less likely that parties would be willing to engage with OPG on other first mover projects like DNNP, as doing so would put their confidential commercial information at risk.</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB concluded that a summary of the IPA included in the pre-filed evidence qualified for confidential treatment. It did so pursuant to Appendix A, Part (a)(i) (competitive position) and Appendix A, Part (a)(iii) (interfere with negotiations). The redacted information here reflects details of the same key contractual terms (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.10; see also Practice Direction, Appendix A, Part (e)).</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
L-D2-Staff-118, Attachment 1	Page 44	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> This redacted information is the forecasted number of contract awards for DNNP Unit 1. When combined with the total number of contracts awarded, included on the same page, this information provides insight into the amount of procurement remaining for DNNP Unit 1, information that is commercially sensitive and non-public.</p> <p>The market's capacity to accommodate those remaining procurements is not unlimited. Accordingly, if this information is disclosed on the public record and the Applicants' competitors for that capacity are provided insight into the amount of procurement remaining for DNNP Unit 1, those competitors may adjust their contracting strategies and to more quickly fill some of that capacity for their own projects to the Applicants' and ratepayers detriment. Disclosure of this information could therefore result in competitive prejudice to the Applicants (Practice Direction, Appendix A, Part (a)(i)).</p>
L-D3-SEC-118, Attachment 1	Pages 1, 6-7	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for a new project. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., cost management, project management, inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and other) have been redacted as well insofar as these can be used to determine the contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts can result in vendors increasing their bids to maximize profit, based on the knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claim disputes, and prejudice OPG's competitive</p>
L-D3-SEC-118, Attachment 2	Pages 1, 6-7			
L-D3-SEC-119, Attachment 1	Pages 1, 6-7			

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>position to the detriment of OPG’s cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB determined that information related to vendors’ performance should be subject to confidential treatment because it could harm future negotiations, damage contractual relationships, prejudice the competitive position of the parties involved, and it could cause reputational harm to the vendors involved. (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.4). In addition, the OEB has previously treated as confidential similar information sought to be redacted. (EB-2020-0290, Decision on Confidentiality, June 8, 2021 at p.5; EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, dated November 1, 2016, at pp. 15-17; see also Practice Direction, Appendix A, Part (e)).</p>
L-D3-SEC-123 Attachment 1	All	No	Confidential Labour-Sensitive Treatment	<p><b>Sensitive Labour Information:</b> The redacted information consists of a net present value assessment model for the Corporate Headquarters project, which includes labour-sensitive assumptions regarding employee severance and relocation costs.</p> <p>The disclosure of this information on the public record could prejudice OPG’s ongoing and future negotiations with the unions in matters involving relocation and severance-related decisions. By revealing how OPG management evaluates the financial impacts of such decisions, and the financial risk thresholds it has taken with respect to such decisions in the context the Corporate Headquarter relocation project, the public disclosure of this model and its labour-sensitive assumptions could prejudice OPG’s ability to defend its position on similar issues in ongoing and future disputes with the unions.</p> <p>This is a particularly acute risk in the context of interest arbitrations where internal costing models and past assessments of “materiality” can be introduced by the union as objective evidence of management’s ability and willingness to absorb certain financial risks. In OPG’s experience, arbitrators place considerable weight on this type of evidence. As such, the public disclosure of this information could prejudice OPG’s ability to advance credible financial arguments to</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				defend managements' rights in future interest arbitrations related to relocation and/or severance decisions.
L-D3-SEC-124, Attachment 1	Pages 1-7	No	Confidential Treatment	<p><b>Public Security and Cybersecurity Information:</b> The redacted information consists of references to the locations and other information that may indicate certain locations of OPG Data Centre and other critical assets (i.e., production and backup data), and the redacted information also includes references to the name of a cloud solution provider.</p> <p>The redacted information is highly sensitive as it concerns the physical security and cybersecurity of OPG's power generation and other assets. The Data Centre information is classified by OPG as sensitive infrastructure details, because it identifies the location of critical nodes in OPG assets and power generation system. Information about OPG's cloud solution provider and hosting arrangements is considered sensitive under OPG's cybersecurity guidance due to risk of enabling inference of architecture, dependencies, and potential attack vectors; that is, this information could be targeted for collection and used in a cyber attack.</p> <p>Public disclosure of this information could create a security risk by enabling malicious actors to map OPG's controlled environment, target specific assets, and plan either physical or cyber sabotage. As a result, disclosure could prejudice both physical security and cybersecurity (Practice Direction, Appendix A, Part (c)).</p> <p><b>Previous Treatment:</b> OEB has previously determined that information related to the security of OPG's facilities, such as references to sensitive locations and other security matters, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 19, 22; EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 20-21) (Practice Direction, Appendix A, Part (e)). The OEB has also previously determined that information related to IT systems which, if disclosed, would create a cybersecurity risk, should be subject to confidential</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				treatment (EB-2022-0318, Decision on Confidentiality, dated June 23, 2023, at pp. 1-2) (Practice Direction, Appendix A, Part (e)).
L-E1-SEC-128, Attachment 1	Pages 1-15	Yes	Confidential Treatment	<p><b>Competitively Sensitive Information:</b> The redacted information consists of 2027 regulated hydroelectric outage data for various power generation stations owned and operated by OPG. It includes the start date and outage length duration.</p> <p>The redacted information is “competitively sensitive information” (“<b>CSI</b>”) within the meaning of Part 7 of OPG’s Electricity Generation License EG-2023-0231, valid until October 2, 2043. According to the license, OPG is required to implement a ring-fencing plan to ensure among other things that no CSI is disclosed to affiliates as part of such ring-fencing of affiliate market functions.</p> <p>Keeping CSI confidential is an OPG license requirement that is akin to a record-keeping and filing requirement where the Ontario Energy Board prohibits OPG from disclosing CSI publicly. As such, CSI should be protected as confidential on that basis (Practice Direction, Appendix B, Part 11 and 12).</p> <p><b>Commercially Sensitive Information:</b> Insofar as OPG is authorized under Part V of the <i>Ontario Energy Board Act</i>, 1998, S.O. 1998, to generate electricity, buy and sell electricity, or provide ancillary services, subject to the terms and conditions set out in the OPG’s license, keeping CSI confidential is a requirement established in applicable legislation and it should also be protected on this ground (Practice Direction, Appendix A, Part (f)).</p>
L-F1-SEC-150, Attachment 1	Pages 2, 12-13, 32	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of the agreed costs, pricing formula, and pricing elements that determine the amounts payable to OPG for operating four Hydro Québec power generating units.</p> <p>The redacted information is commercially sensitive. Hydro Québec (a counterparty to OPG) communicated to OPG the commercial sensitivity of this information. Hydro Québec’s generation division is unregulated, and the company does not disclose publicly unit or station specific</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>costs. This information is treated in confidential manner. Public disclosure of Hydro Québec's operating costs could prejudice their competitive position insofar as their competitors would be able to infer Hydro Québec's cost curve and anticipate their pricing behavior based on the knowledge of these operating costs. Competitors may adjust their own market conduct to the detriment of Hydro Québec's competitive position by exploiting this commercially sensitive information. As a result, disclosure could prejudice Hydro Québec's economic interests and competitive position on the market and lead to a significant loss (Practice Direction, Appendix A, Part (a)(i) and (iv)).</p> <p><b>Previous Treatment:</b> OEB has previously determined that information related to third parties, the public disclosure of which could reasonably be expected to prejudice the economic interest and competitive position of those third parties, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, dated April 13, 2021, at p. 9) (Practice Direction, Appendix A, Part (e)).</p>
L-F1-SEC-150, Attachment 1	Pages 27, 29, 31	No	Confidential Treatment	<p><b>Public Security Information:</b> The redacted information consists of three station operating diagrams (Schedules B, C, and D to Operations and Maintenance Agreement). The redacted information is highly sensitive as it concerns the physical security of OPG's power generation assets. It identifies critical nodes in the power generation system.</p> <p>Public disclosure of this information could create a security risk by enabling malicious actors to map OPG's controlled environment, target the assets, and plan either physical or cyber sabotage. As a result, disclosure could prejudice both physical security and cybersecurity (Practice Direction, Appendix A, Part (c)).</p> <p><b>Previous Treatment:</b> OEB has previously determined that information related to the security of OPG's facilities, such as references to sensitive locations and other security matters, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality, dated June 8, 2021, at pp. 19, 22; EB-2016-0152, Decision and Order</p>

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				on Confidentiality, dated January 31, 2017, at pp. 20-21) (Practice Direction, Appendix A, Part (e)).
L-F2-CCC-071, Attachment 1	All	Yes	Confidential Treatment	<p><b>Third-Party Proprietary Information Dataset and/or Model of Consultant:</b> The redacted information consists of the underlying work files of a third-party consultant. The redacted document contains the confidential and proprietary datasets and models of this third-party consultant and as such are presumptively confidential under the Practice Direction (Practice Direction, Appendix B, Part 7).</p> <p>These documents and files have consistently been treated as confidential by the Applicants and by the consultant. Disclosure of these proprietary documents and files on the public record could prejudice the commercial interests and competitive position of the consultant, as it would allow others to ascertain the proprietary and sensitive aspects of its methodologies, undermining the basis of the consultant’s business (Practice Direction, Appendix A, Part (a)(i), (iv), and (b)).</p> <p>The underlying datasets also include commercially sensitive benchmarking data that is in the interest of the Applicants, ratepayers, and the broader public interest to treat confidentially in order to incentivize the exchange of shared experience and knowledge among the limited parties who possess it in a free and open manner. That free and open exchange would be at risk if the OEB required this information to be made public (Practice Direction, Appendix A, Part A(iv)).</p> <p><b>Previous Treatment:</b> The OEB has previously redacted information that reveals proprietary aspects of a consultants’ methodology (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 26, 2024, at p. 9). The OEB has also previously approved confidential treatment for benchmarking information. (EB-2023-0195, Decision on Confidentiality and Procedural Order No. 8, September 6, 2024, at p. 7) (Practice Direction, Appendix A, Part (e)).</p>

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L-F2-SEC-171	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of uranium market forecast data prepared by UxC, a company specialized in nuclear industry market research and analysis.</p> <p>This forecast data is prepared by UxC and was obtained by the Applicants through a license that prohibits public dissemination. It is confidential and proprietary information created by UxC that is directly monetized as the basis of their business and is available for subscription on UxC’s website. Public disclosure of this information would fundamentally undermine UxC’s business, prejudice their competitive position and may cause significant losses for UxC (Practice Direction, Appendix A, Part (a)(i) and (iv)). UxC has advised the Applicants that they consent to the information being provided on a confidential basis.</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information obtained through a license that prohibits public dissemination can be treated confidentially. Accordingly, the Applicants’ respectfully submit that the commercial risks to UxC warrant confidential treatment (EB-2024-0063, Decision on Confidentiality, December 9, 2024, at p. 4) (Practice Direction, Appendix A, Part (e)).</p>
L-F2-Staff-204, Attachment 1	Pages 1, 6	No	Confidential Treatment	<p><b>Commercially Sensitive Project Costs:</b> The redacted information consists of specific contingency amounts for a new project. Contingency amounts represent an allowance for discrete project risks or issues that may arise throughout the course of a project. Other amounts related to project costs (e.g., project management, inspection, engineering, procurement, construction, commissioning, closeout, outside WBS, subtotals, interest, and other) have been redacted as well insofar as these can be used to determine the contingency amounts. Confidential treatment is not being sought for the total project costs.</p> <p>The redacted information is commercially sensitive. Contingency amounts are kept confidential from vendors as a means for OPG to control project costs. Public disclosure of contingency amounts can result in vendors increasing their bids to maximize profit, based on the</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>knowledge that OPG has budgeted additional funding to pay for contingency. As a result, disclosure could significantly interfere with negotiations, or claim disputes, and prejudice OPG's competitive position to the detriment of OPG's cost efficiency efforts and ultimately the contract price (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB has determined that information related to contingency amounts and other information that could be used to determine contingency amounts should be subject to confidential treatment. The OEB accepted that knowledge of contingency amounts could affect negotiations and contract price (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, dated April 13, 2026, at pp. 10-11; EB-2016-0152, Decision on Confidential Filings and Procedural Order No 3, dated November 1, 2016, at p. 5; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No 4, dated March 21, 2014, at pp. 3-5; see also Practice Direction, Appendix A, Part (e)).</p>
L-F2-Staff-209	Pages 1-2	Yes	Confidential Labour-Sensitive Treatment	<p><b>Augmented Staff Pay Rates and Collective Bargaining:</b> The redacted information consists of labour cost differentials between Augmented Staff (contractors) utilized during outages and OPG staff (PWU/ Society labour jurisdiction) employed to work overtime during outages. The redacted information is presumptively confidential because it relates to current or future collective bargaining negotiations and OPG's collective bargaining strategies (Practice Direction, Appendix B, Part 8).</p> <p><b>Commercially Sensitive Information:</b> In addition, the redacted information is labour-relations sensitive, and it reveals OPG's labour strategy. Public disclosure could adversely impact and influence the outcome of future collective bargaining, conferring an unfair advantage on the unions and insight into OPG's strategy; it could also unfairly influence third party arbitrators. As a result, disclosure could diminish OPG's leverage, and OPG's bargaining capital.</p> <p>On the other hand, the negotiated rates between OPG and vendors are also confidential and labour-sensitive; they are not the same across vendors and should remain confidential. Disclosure could, therefore,</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>significantly interfere with vendor negotiations and prejudice OPG's position in the upcoming rounds of collective bargaining (Practice Direction, Appendix A, Part (a)(iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that cost estimates and underpinning assumptions that are labour-sensitive, or information that relates to collective bargaining strategies, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, dated April 13, 2021, at pp. 4-6; EB-2016-0152, Decision on Confidentiality, dated May 4, 2017 at p. 2); EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 14-16 (Practice Direction, Appendix A, Part (e)).</p>
L-F3-SEC-179, Attachment 3	Pages 22-26	No	Confidential Treatment	<p><b>Sensitive Cybersecurity Information:</b> The redacted information is included in the cyber security schedule containing cybersecurity requirements, controls, protocols, responsibilities, escalation expectations, information-handling requirements, system/interface obligations, and compliance mechanisms applicable to OPG and its subsidiary, PowerON Energy Solutions.</p> <p>Public disclosure of this information will reveal sensitive cybersecurity arrangements that are particular to OPG and its subsidiaries and could provide threat actors with insight into OPG's cybersecurity posture, thereby increasing cybersecurity risk which may result in significant loss to OPG and the ratepayers (Practice Direction, Appendix A, Part (a)(iv) and (c)).</p> <p><b>Previous Treatment:</b> The OEB has previously granted confidentiality to cyber protocols in accordance with Appendix A, Part (c) of the Practice Direction (EB-2024-0198, Decision on Confidentiality and Procedural Order No. 7, August 25, 2025, at pp. 7).</p>
L-F4-AMPCO-123	Page 2	No	Confidential Treatment	<p><b>Commercially Sensitive Information and Confidential Financial Information:</b> This redacted information includes both forecast Earnings Before Tax ("EBT") at the OPG Inc. level, and percentages of EBT as an input to Total Performance Incentive Costs. If publicly disclosed, this information would enable the calculation of forecast EBT for OPG Inc.</p>

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				<p>OPG's EBT is financial information reflecting the combined regulated and unregulated assets and business of OPG. This information is confidential because disclosure of this aggregated information (combined with information regarding the regulated business already disclosed) would allow for the disclosure of information related to OPG's unregulated business (including unregulated subsidiaries) and facilities.</p> <p>OPG consistently treats information relating to its unregulated business as confidential financial information and confidential commercially sensitive information. If disclosed on the public record, it could prejudice OPG's competitive position with respect to those assets and business (Practice Direction, Appendix A, Part (a)(i) and (b)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved of confidential treatment for OPG's EBT (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.4). Similar information in OPG's Business Plan was also afforded confidential treatment by the OEB in OPG's previous four rate applications (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, April 13, 2021 at p. 9; EB-2016-0152, Procedural Order No. 3, November 1, 2016 at pp. 3-4; and EB-2013-0321, Procedural Order No. 4, March 21, 2014 at p. 6; see also Practice Direction, Appendix A, Part (e)).</p>
L-F4-CCC-093	Page 2	Yes	Confidential Labour-Sensitive Treatment	<p><b>Salary Escalation and Collective Bargaining:</b> The redacted information consists of longer-term salary escalation rate and related information. The redacted information is presumptively confidential because it relates to current or future collective bargaining negotiations and OPG's collective bargaining strategies (Practice Direction, Appendix B, Part 8).</p> <p><b>Commercially Sensitive Information:</b> In addition, the redacted information is also labour-relations sensitive. Salary rates and assumptions inform OPG's strategy for negotiating labour monetary/compensatory items at collective bargaining, and these openly disclose OPG's mandate to negotiate.</p>

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Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request <sup>1</sup>	Explanation and Rationale
				<p>Public disclosure could adversely impact and influence the outcome of current or future collective bargaining, conferring an unfair advantage on the unions and insight into OPG's strategy; it could also unfairly influence third party arbitrators. As a result, disclosure could create an artificial floor on wages, diminish OPG's leverage, and OPG's bargaining capital. Once disclosed, this information would become a reference point for unions, shaping expectations and anchoring demands around what OPG can absorb. Even when business conditions change, OPG as an employer may be forced to justify why similar proposals are no longer acceptable, limiting its ability to respond flexibly to evolving economic, operational, or workforce realities. Disclosure could, therefore, significantly interfere with negotiations and prejudice OPG's position in the upcoming rounds of collective bargaining with both industrial bargaining units, the PWU and the Society (Practice Direction, Appendix A, Part (a)(iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that cost estimates and underpinning assumptions that are labour-sensitive, or information that relates to collective bargaining strategies, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, dated April 13, 2021, at pp. 4-6; EB-2016-0152, Decision on Confidentiality, dated May 4, 2017 at p. 2; EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 14-16; see also Practice Direction, Appendix A, Part (e)).</p>
L-G2-CCC-097	Pages 2-3	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of pricing and a pricing breakdown for OPG's heavy water processing service for a specific facility. Other pricing-related amounts have also been redacted, as they are inputs to the pricing calculations.</p> <p>Public disclosure of this information will provide third parties, including competitors and future counterparties, with insight into OPG's pricing breakdown for its heavy water processing service. This information could be used as an artificial benchmark in future negotiations, reducing OPG's flexibility to negotiate terms. As a result, disclosure</p>

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				could significantly interfere with negotiations by allowing future counterparties to adjust their negotiation strategies which, in turn, may prejudice OPG's competitive position (Practice Direction, Appendix A, Part(a)(i) and (iii)).
L-F4-SEC-194	All	No	Confidential Labour-Sensitive Treatment	<p><b>Sensitive Labour Information:</b> The redacted information details OPG's cost impacts, underlying assumptions, and supporting rationales for all changes negotiated in the collective agreements with the PWU and the Society since the last application.</p> <p>This constitutes labour-sensitive information that may compromise OPG's bargaining position in future negotiations or arbitrations, potentially resulting in material adverse financial impacts. Public disclosure of this information would impair OPG's ability to assert that similar future proposals are unaffordable or unreasonable at the bargaining table or before an arbitrator. Consequently, future outcomes related to labour negotiations or arbitrations may be unduly influenced by the historical precedents and regulatory context set out in the redacted information, rather than being guided by current business needs and circumstances.</p> <p><b>Previous Treatment:</b> The IR requests that the information be provided in the same format as the response provided in EB-2020-0294, F4-03-SEC-145. Applicants note that the information in that proceeding was treated confidentially.</p>
L-F4-SEC-195	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Information and Confidential Financial Information:</b> This redacted information includes the percentages of OPG Inc. EBT applied for the Stakeholder Return Program. If publicly disclosed, this information, together with the incentive amounts provided in Exhibit F4-1-1 and the calculations shown in L-F4-AMPCO-123 would enable the calculation of forecast EBT for OPG Inc.</p> <p>OPG's EBT is financial information reflecting the combined regulated and unregulated assets and business of OPG. This information is confidential because disclosure of this aggregated information (combined with information regarding the regulated business already</p>

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				<p>disclosed) would allow for the disclosure of information related to OPG's unregulated business (including unregulated subsidiaries) and facilities.</p> <p>OPG consistently treats information relating to its unregulated business as confidential financial information and confidential commercially sensitive information. If disclosed on the public record, it could prejudice OPG's competitive position with respect to those assets and business (Practice Direction, Appendix A, Part (a)(i) and (b)).</p> <p><b>Previous Treatment:</b> In this proceeding, the OEB approved of confidential treatment for OPG's EBT (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p.4). Similar information in OPG's Business Plan was also afforded confidential treatment by the OEB in OPG's previous four rate applications (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, April 13, 2021 at p. 9; EB-2016-0152, Procedural Order No. 3, November 1, 2016 at pp. 3-4; and EB-2013-0321, Procedural Order No. 4, March 21, 2014 at p. 6; see also Practice Direction, Appendix A, Part (e)).</p>
L-F4-Staff-227	Page 1	Yes	Confidential Labour-Sensitive Treatment	<p><b>Wage Escalation and Collective Bargaining:</b> The redacted information consists of future wage escalation assumptions in the years from 2026 to 2031. Past wage increases are not redacted (i.e., the 2025-2026 wage assumptions for PWU are actual increases, whereas only the 2025 assumptions for Society and Management are actual increases). The redacted information is presumptively confidential because it relates to current or future collective bargaining negotiations and OPG's collective bargaining strategies (Practice Direction, Appendix B, Part 8).</p> <p><b>Commercially Sensitive Information:</b> In addition, the redacted information is also labour-relations sensitive. The wage assumptions inform OPG's strategy for negotiating labour monetary/ compensatory items at collective bargaining, and these openly disclose OPG's mandate to negotiate.</p>

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				<p>Public disclosure could adversely impact and influence the outcome of current or future collective bargaining, conferring an unfair advantage on the unions and insight into OPG's strategy; it could also unfairly influence third party arbitrators. As a result, disclosure could create an artificial floor on wages, diminish OPG's leverage, and OPG's bargaining capital. Once disclosed, this information would become a reference point for unions, shaping expectations and anchoring demands around what OPG can absorb. Even when business conditions change, OPG as an employer may be forced to justify why similar proposals are no longer acceptable, limiting its ability to respond flexibly to evolving economic, operational, or workforce realities. Disclosure could, therefore, significantly interfere with negotiations and prejudice OPG's position in the upcoming rounds of collective bargaining with both industrial bargaining units, the PWU and the Society (Practice Direction, Appendix A, Part (a)(iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that cost estimates and underpinning assumptions that are labour-sensitive, or information that relates to collective bargaining strategies, should be subject to confidential treatment (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence, dated April 13, 2021, at pp. 4-6; EB-2016-0152, Decision on Confidentiality, dated May 4, 2017 at p. 2; EB-2016-0152, Decision and Order on Confidentiality, dated January 31, 2017, at pp. 14-16; see also Practice Direction, Appendix A, Part (e)).</p>
L-G1-Staff-238	Pages 2-3	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information relates to annual Clean Energy Credits ("CEC") revenues and production quantities. The redacted information is commercially sensitive.</p> <p>CEC sales are conducted in competitive markets. The disclosure of these CEC revenues and production amounts would reveal OPG's negotiating leverage, price expectation, and negotiating parameters in this developing market to competitors who wish to secure a place in the CEC market. Disclosure of this information in a developing market</p>

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				<p>could put OPG at a competitive disadvantage when negotiating these CECs, thereby prejudicing OPG's ability to maximize value and obtain fair market outcomes in future transactions (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment by the Privacy Commissioner:</b> In Order PO-4698, OPG sought to redact CEC sale and revenue information. The Ontario Information and Privacy Commissioner ("IPC") accepted that the CEC market is small, not fully matured and very competitive. Disclosure of CEC revenue information would (i) diminish its value for OPG and would benefit OPG's competitors, (ii) could reasonably be expected to disadvantage OPG's future negotiations with other parties, and (iii) impede OPG's ability to carry out its mandate of ensuring the supply of low-cost electricity in Ontario.</p> <p>Given this IPC Order, the OEB should maintain confidentiality of these CEC revenues and production quantities (Practice Direction, Appendix A, Part (d)). Otherwise, public disclosure of these CEC revenues and production quantities would render the IPC's order moot.</p>
L-G2-Staff-244	Page 1	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of forward-looking operating performance information (the operating capacity factor) of the Tritium Removal Facility ("TRF"). An operating capacity factor is a percentage of a facility's actual output it could produce if it is operated at full rate capacity for a specified period. The redacted information is commercially sensitive.</p> <p>Public disclosure of this information could allow market participants and counterparties to infer the TRF's expected output profile and production availability. This information could reveal commercially sensitive assumptions regarding production availability and operating performance. Disclosure could therefore prejudice OPG's competitive position as a leader in tritium extraction, concentration and storage, and interfere with future negotiations by enabling counterparties to assess the TRF's expected production position, which may result in</p>

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				less favourable pricing, increased contracting costs, or other adverse commercial terms (Practice Direction, Appendix A, Part (a)(i) and (iii)).
L-G2-Staff-245	Page 2	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of contractual terms negotiated between OPG and the IESO regarding reactive support and voltage control services. These terms are not standard and reflect the parties' negotiated positions and commercial compromises.</p> <p>The redacted contractual terms are commercially sensitive. Public disclosure of these contractual terms will provide future counterparties within the market with insight into the IESO's previous commercial positions. This information could be used as an artificial benchmark in future negotiations, hampering the IESO's flexibility to negotiate more favorable terms and will prejudice the IESO's competitive position in future negotiations. As a result, disclosure could significantly interfere with negotiations by allowing future counterparties to adjust their strategies to maximize their benefit which may prejudice the IESO's competitive position (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p>
L-I1-Staff-266, Attachment 1	Pages 2-4	No	Confidential Treatment	<p><b>Commercially Sensitive Information:</b> The redacted information consists of specific figures on return on equity (ROE) calculations that relate to margins on heavy water sales as part of nuclear revenue and other related information that would allow determination of the sales and proceeds.</p> <p>The redacted information is commercially sensitive. It concerns OPG's heavy water sales and processing, which is an unregulated business activity. Public disclosure of such information could prejudice OPG's competitive position and interfere significantly with any future negotiations being carried out by OPG where revenue depends on the forces of supply and demand in a limited market and a small number of potential transactions. Public disclosure of this information could be exploited by OPG counterparties by adjusting their strategy and negotiating position that would adversely impact OPG. As a result, disclosure could significantly interfere with current or future negotiations</p>
L-I1-Staff-266, Attachment 2	Pages 2-4			

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				<p>and prejudice OPG's competitive position in the market for heavy water (Practice Direction, Appendix A, Part (a)(i) and (iii)).</p> <p><b>Previous Treatment:</b> The OEB has previously determined that information related to sales and proceeds from heavy water sales business, or information that would allow determination of such information, should be treated confidentially (EB-2016-0152, Decision on Confidential Filings and Procedural Order No. 3, dated November 1, 2016, at p. 4; EB-2013-0321, Decision and Order on Confidential Filings and Procedural Order No. 4, dated March 21, 2014, at p. 3; see also Practice Direction, Appendix A, Part (e)).</p>