

May 29, 2026

RESS & EMAIL

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

Attention: Mr. Richie Murray, Registrar

Dear Mr. Murray:

Re: EB-2025-0312: Elexicon Energy Inc. (“Elexicon”) 2027-2031 Electricity Distribution Rates (the “Application”)– Interrogatory Responses Confidentiality Request Reply Submission

On May 8, 2026, Elexicon filed interrogatory responses for its custom rate application for electricity distribution rates and charges for the 2027-2031 period (the “**Application**”) with the Ontario Energy Board (“**OEB**”). On the same day, Elexicon submitted a request for confidential treatment and permanent redaction of certain information contained in the interrogatory responses pursuant to the OEB’s Practice Direction on Confidential Filings (the “**Practice Direction**”). The requested redactions were for portions of evidence that consist of the following information:

- Information that poses a cybersecurity risk
- Third-party consultant and vendor pricing and unit pricing information
- Commercially sensitive and proprietary consultant methodology
- Competitive third-party pricing and bid-related information
- Information about the physical security of Elexicon’s sites
- Labour sensitive forecast information
- Commercially sensitive information that can prejudice Elexicon’s competitive position in the labour market
- Compensation information that is personal information
- Solicitor-client privileged information
- Non-relevant HST numbers
- Non-relevant tax information

On May 22, 2026, Staff filed its submissions on Elexicon’s confidentiality request. While Staff agreed with most of Elexicon’s proposed redactions, they opposed or sought clarification on several proposed redactions. In accordance with Procedural Order No. 2, in this submission Elexicon addresses the redactions challenged by Staff and provides additional clarification as requested. For ease of reference, the structure of Elexicon’s reply submission generally follows the structure of Staff’s submissions.

To assist the OEB in rendering a decision that addresses the complete scope of the confidentiality request, Elexicon wishes to highlight that Staff’s submissions are silent in respect of certain page references of proposed redactions in the table below. For the avoidance of doubt, Elexicon confirms that these page references were included in its initial confidentiality request.

Category of Information	IR Reference	Page Number Not Addressed in Staff’s Submission
Information that Poses a Cyber Security Risk	4-CCC-51, Appendix A – Dx NEXT RFP Final	38, 60, 92, 134 (Part 3, PDF pp. 47, 69, 101, 143)
Information that Poses a Physical Security Risk	2-Staff-75, Attach 1 CCRAs	21 (Part 2, PDF p. 1418)
Non-Relevant HST Numbers	2-Staff-75, Attach 1 CCRAs	7, 10, 25, 29, 46, 49, 77, 80, 110, 116 (Part 2, PDF pp. 1404, 1407, 1422, 1426, 1443, 1446, 1474, 1477, 1507, 1513)

1. **Page Referencing Issues**

Elexicon acknowledges Staff’s comments regarding certain pagination issues in the submitted confidentiality letter. To address this, Schedule A contains an updated version of the confidentiality request with added PDF page references in reference to the Appendix A documents, similar to those provided by Staff in its submissions. Elexicon also notes that the footnotes were inadvertently omitted from the original letter due to an administrative oversight, and have now been included in Schedule A. The revised confidentiality letter does not include any additional requests or substantive changes.

Staff indicated that the confidentiality cover page “incorrectly labelled 6-Staff-148 as 2-Staff-75, Attach 1 CCRAs” and that in the May 8, 2026, letter requesting confidentiality, 2-Staff-75, Attach 1 CCRAs was referenced as 1-Staff-75, Attach 1 CCRAs. Elexicon thanks Staff for raising this issue, and notes that the revised confidentiality request appended hereto has replaced two erroneous references to “1-Staff-75, Attach 1 CCRAs” with “2-Staff-75, Attach 1 CCRAs”.¹

¹ Further, 6-Staff-148 does not appear to be preceded by a cover page that states 2-Staff-75, but confusion may have arisen from an inactive PDF bookmark for 2-Staff-75, Attach 1 CCRAs in Appendix A, Part 2 (PDF page 1397).

Further, in response to Staff's input that certain documents were not text searchable, Elexicon has filed a courtesy copy of 2-Staff-75, Attach 1 CCRA (as appears in Appendix A, Part 2, PDF Page 1397) that is text searchable.

2. Cyber Security Risk

a) 4-CCC-51, Appendix A – Dx NEXT RFP Final – Page 13 (Appendix A, Part 3, PDF Page 22)

The redactions on the above-referenced page pertain to the length of the software licenses secured through the Dx NEXT program. Staff submits that this information does not represent a cybersecurity risk to Elexicon.

Elexicon agrees that this information does not represent a cybersecurity risk; however, Elexicon wishes to clarify that it requested these redactions under the category of third-party commercially sensitive information, rather than for reasons relating to cybersecurity:

Third-Party Commercially Sensitive Information: *The redacted information consists of pricing-related commercial terms for the software cost components of the Dx NEXT project. The vendor has advised Elexicon that publicly disclosing this information could prejudice the vendor's competitive position in providing similar software services to other potential clients, and can impair its ability to negotiate agreements with other customers. This information is commercially sensitive and, if disclosed, could prejudice the competitive positions of the vendor, interfere with future negotiations, and may produce a significant loss to the vendor. (Practice Direction, Appendix B, parts 1 and 2, Appendix A, parts (a)(i), (iii) and (iv)).*

The length and form of the software licensing arrangements were specifically negotiated items during the Dx NEXT procurement. Earlier in this proceeding, the OEB accepted Elexicon's request to redact equivalent information:²

Elexicon Energy stated that the information proposed for redaction regarding the terms and length of the Capgemini (software implementation vendor) contract is distinct from unredacted portions of the application that relate to the timeline of the Dx NEXT project. Further, the information proposed to be redacted "either explicitly or implicitly describes the manner in which certain cost components may change over the contractual term." Elexicon Energy submitted that each of the proposed redactions reveals enough information about the commercial arrangement that can harm Elexicon Energy's vendors' commercial business interests and future negotiations. Elexicon Energy produced a letter from Capgemini as part of its reply submission, which, as stated by Elexicon Energy, "sets out a first-hand account of the harm that Capgemini expects to sustain if the information is publicly disclosed." [references omitted]

[...]

The OEB accepts that the proposed redactions relate to information that, if disclosed, could prejudice the vendor's competitive position in providing similar software services to other potential clients, and impair its ability to negotiate agreements with other

² Exhibit 4, Tab 1, Schedule 6, Appendix A-1, page 7 (PDF page 293); Decision on Issues List and Confidentiality (April 10, 2026), pages 13-14 [item 21].

customers. These are considerations identified in Appendix A to the Practice Direction. The OEB will therefore allow the redactions.

In further support of the proposed redaction, Elexicon relies on its submissions in item four of Elexicon's confidentiality reply letter, dated March 17, 2026, as well as in the letter from Caggemini Canada appended thereto.³ Elexicon further notes that equivalent redactions were not challenged by Staff on page 43 (PDF Appendix A, Part 3, Page 52).

Elexicon respectfully requests that the OEB continue to permit these redactions, consistent with its previous decision on confidentiality.

b) 4-CCC-51, Appendix A – Dx NEXT RFP Final – Page 61 (Appendix A, Part 3, PDF Page 70)

The redacted word describes the locational scope of the software provider. Staff submits that this does not represent a cybersecurity risk to Elexicon.

Upon further review, Elexicon agrees to remove this redaction.

c) 4-CCC-51, Appendix A – Dx NEXT RFP Final – Pages 65, 74, 139, 142, 174, and 198 (Appendix A, Part 3, PDF Pages 74, 81, 148, 151, 183, and 207)

The redacted information discloses the software provider for Elexicon's human capital management platform. Staff submits that this software does not represent a cybersecurity threat, particularly because the software is commonly used in the industry.

Elexicon submits that it is appropriate for the OEB to allow the redaction of this information. This application houses extensive amounts of highly sensitive financial and personal information of Elexicon's employees. Since Elexicon is ultimately responsible for the stewardship of this sensitive information and is required to safeguard the personal information included therein in accordance with applicable privacy legislation, Elexicon submits that it is appropriate to redact the name of this software and, consequently, the location of this data.

Disclosing the name of this software could also facilitate unauthorized access to this system by a malicious actor. If vulnerabilities were ever exposed, the personal information of employees would be at risk of exploitation. Furthermore, the fact that this application might be commonly used in the industry does not detract from the harms that could materialize if this information were to be publicly disclosed. Due to the risks associated with this specific application, it is one of the small number of high-risk applications that Elexicon has requested to redact. To this end, Elexicon submits that it has taken a balanced approach by only requesting redactions for those applications that it has determined to be high risk.

It is noteworthy that in these proceedings, the OEB accepted redactions to a newer, alternate name for this same application.⁴ For context, the software in question is interchangeably referred

³ Elexicon's Confidentiality Request Reply Submission (March 17, 2026), pages 7-8, 11.

⁴ Exhibit 4, Tab 1, Schedule 6, Appendix A, page 11 (PDF page 267); Decision on Issues List and Confidentiality (April 10, 2026), page 5 [item 5].

to by two names, as the name of the application's provider has changed in recent history.⁵ Staff has not challenged the proposed redaction of the newer name of this application; however, disclosing the former name of this application would allow a reasonably informed person to identify the software in question. As such, Elexicon respectfully requests that the OEB continue to permit the redaction of this software, consistent with its previous decision on confidentiality.

d) 6-Staff-148 Attachment 6 – Tax Return 2019 – Elexicon Energy Inc. – Page 21 (Appendix A, Part 2, PDF Page 544)

Staff submits that the information that Elexicon seeks to redact is generic information containing commonly used software names and unspecific financial, inventory, and work systems. Staff does not agree with Elexicon that this information represents a cybersecurity risk.

Upon further review, Elexicon is amenable to removing these redactions. Elexicon notes that for consistency, it will remove proposed redactions for this information also included in Veridian's 2018 and Elexicon's 2020-2023 tax returns.⁶

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

Sincerely,

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

Daliana Coban

cc: Erin Stevens, Elexicon Energy Inc.

⁵ To see an example of the alternative name, please see 4-CCC-51, Appendix A – Dx NEXT RFP Final, page 61 (PDF Appendix A, Part 3, page 70).

⁶ 6-Staff-148, Attachments 2, 7-10 (Appendix A, Part 2, PDF Pages 21, 673, 830, 955, and 1077 respectively).

Schedule "A"

Updated Confidentiality Request Letter (Revised May 29, 2026)

Please see attached.

May 8, 2026 [Revised May 29, 2026]

RESS & EMAIL

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

Attention: Mr. Richie Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2025-0312: Elexicon Energy Inc. (“Elexicon”) 2027-2031 Electricity Distribution Rates (the “Application”)– Request for Confidential Treatment of Information in Interrogatory Responses

We are legal counsel to Elexicon, the applicant in the above-referenced proceeding. Elexicon filed interrogatory responses on May 8, 2026. Pursuant to the OEB’s *Practice Direction on Confidential Filings* (the “**Practice Direction**”), Elexicon hereby requests OEB approval (i) for confidential treatment under Parts 5 and 6 of the Practice Direction, and/or (ii) to permanently redact from the public record, information that is (a) not relevant pursuant to Part 11, and (b) personal information pursuant to Part 10, for certain information contained in the interrogatory responses.

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

• **Information that poses a cybersecurity risk:**

- 6-Staff-148, Attach. 2_Tax Return 2018 Veridian Connections Inc., Pages 9-11, ~~20~~-21, 23-24
- 6-Staff-148, Attach. 4_Tax Return 2019 Veridian Connection Inc., Pages 9-11
- 6-Staff-148, Attach. 6_Tax Return 2019 Elexicon Energy Inc., Pages 9, 12-13, ~~22~~-23, 25-26
- 6-Staff-148, Attach. 7_Tax Return 2020 Elexicon Energy Inc., Pages 9, 11-13, 20, ~~22~~-23, 25-26
- 6-Staff-148, Attach. 8_Tax Return 2021 Elexicon Energy Inc., Pages 9, 11-13, 20, ~~22~~-23, 25-27
- 6-Staff-148, Attach. 9_Tax Return 2022 Elexicon Energy Inc., Pages 9-10, 12-14, 23, 25-26, 28-30
- 6-Staff-148, Attach. 10_Tax Return 2023 Elexicon Energy Inc., Pages 9-10, 12-14, 18, 22, 25-26, 28-30

- 4-CCC-51, Appendix A – Dx NEXT RFP Final, Pages 38, 56-61, 65, 68, 72-75, 77, 92, 130, 134-135, 139, 142, 146, 172, 174, 178, 179, 180, 183-184
 - 4-CCC-51, Appendix G – B.1a Dx Next – Board Presentation 11-02-2023 Final_IJB, Page 16
 - 4-CCC-51, Appendix D – Evaluation Matrix Template, Pages 13, 19
 - 4-CCMBC-12, Page 2
 - 4-SEC-78, Pages 2-3
 - 1-QMA-3, Attach 1 Business Continuity Plan Overview, Pages 9-10
- **Third-party consultant and vendor pricing and unit pricing information:**
 - 1-SEC-03, Mercer Retainer, Page 2
 - 1-SEC-03, Clearspring Retainer, Pages 2-3
 - 1-SEC-03, Innovative Retainer, Pages 2-3, 8, 15-16
- **Commercially Sensitive and Proprietary Consultant Methodology:**
 - 4-CCC-51, Appendix G – B.1a Dx Next – Board Presentation 11-02-2023 Final_IJB, Page 4
- **Competitive third-party pricing and bid-related information:**
 - 4-CCC-51, Appendix G – B.1a Dx Next – Board Presentation 11-02-2023 Final_IJB, Pages 6,8, 10-11
 - 4-CCC-51, Appendix A – Dx NEXT RFP Final, Pages 13, 43, 88, 109
 - 4.1-PWU-09, Page 3
 - 4-CCC-50, Page 4
 - 4-CCC-51, Attachment Appendix E Dx NEXT Scoring Matrix_Final Summary
- **Information about the physical security of Elexicon’s sites:**
 - 2-Staff-75, Attach 1 CCRAs, Pages 2, 21, 40, 42, 43, 71, 73, 74, 106
 - 2-Staff-65, Attach 2_B&B BCA – 2849 Durham Regional Highway 2, Pages 23, 38
 - 2-Staff-65, Attach 1_B&B BCA – 195 Progress Drive, Pages 20-21, 31-32
 - 2-Staff-65, Attach 3_B&B BCA – 55 Taunton Road East, Pages 26, 56
 - 2-Staff-65, Attach 5_B&B BCA – 100 Taunton Road East, Pages 11, 12, 13, 27, 36, 47
 - 2-Staff-65, Attach 4_B&B BCA – 1395 Thorah Concession Road 6, Pages 18, 31
- **Labour sensitive forecast information:**
 - 4-CCC-58, page 3
- **Commercially sensitive information that can prejudice Elexicon’s competitive position in the labour market:**
 - 4-CCC-58, Attach 3 – Exec Compensation, Pages 4, 6-7
 - 4-CCC-58, Attach 2 – CEO Compensation, Pages 2-4, 6-7, 12-13
- **Compensation information that is personal information:**
 - 4-CCC-58, Attach 3 – Exec Compensation, Pages 4, 6-7
 - 4-CCC-58, Attach 2 – CEO Compensation, Pages 2-4, 6-7, 12-13
- **Solicitor-client privileged information:**
 - 1-SEC-01, Attach 1_Board Materials, Page 14
- **Non-Relevant HST Numbers:**
 - 6-Staff-148, Attach. 2_Tax Return 2018 Veridian Connections Inc., Pages 1-127

- 6-Staff-148, Attach. 3_Tax Return 2018 Whitby Hydro, Pages 1-60, 95-147
- 6-Staff-148, Attach. 4_Tax Return 2019 Veridian Connection Inc., Pages 1-118
- 6-Staff-148, Attach. 5_Tax Return 2019 Whitby Hydro, Pages 1-125
- 6-Staff-148, Attach. 6_Tax Return 2019 Elexicon Energy Inc., Pages 1-128
- 6-Staff-148, Attach. 7_Tax Return 2020 Elexicon Energy Inc., Pages 1-156
- 6-Staff-148, Attach. 8_Tax Return 2021 Elexicon Energy Inc., Pages 1-121
- 6-Staff-148, Attach. 9_Tax Return 2022 Elexicon Energy Inc., Pages 1-121
- 6-Staff-148, Attach. 10_Tax Return 2023 Elexicon Energy Inc., Pages 1-122
- 2-Staff-75, Attach 1 CCRAs, Pages 7, 10, 25, 29, 46, 49, 77, 80, 110, 116

• **Non-Relevant Tax Information**

- 6-Staff-148, Attach. 2_Tax Return 2018, Pages 1, 9, 12, 15, 19, 22, 25, 80-81, 116-121
- 6-Staff-148, Attach. 4_Tax Return 2019 Veridian Connection Inc., Pages 1, 9, 12, 16, 25, 106-111
- 6-Staff-148, Attach. 6_Tax Return 2019 Elexicon Energy Inc., Pages 1, 10, 14, 17, 21, 23, 27, 40, 119-124
- 6-Staff-148, Attach. 7_Tax Return 2020 Elexicon Energy Inc., Pages 1, 9, 14, 18, 21, 24, 27, 37, 119, 143-145
- 6-Staff-148, Attach. 8_Tax Return 2021 Elexicon Energy Inc., Pages 1, 9, 14, 18, 21, 24, 27, 40, 111-113
- 6-Staff-148, Attach. 9_Tax Return 2022 Elexicon Energy Inc., Pages 1, 10, 15, 20, 24, 27, 30, 43, 112-114
- 6-Staff-148, Attach. 10_Tax Return 2023 Elexicon Energy Inc., Pages 1, 10, 15, 19, 23, 27, 30, 43, 112-114

Appendix A contains a compilation of the unredacted (confidential) versions of the relevant interrogatory responses, each of which is labelled as confidential and includes marked (but not “applied”) redactions for the specific portions of the responses or documents for which Elexicon requests confidential treatment. For ease of reference, in Appendix A, Elexicon has marked redactions in red outline for personal information and blue outline for non-relevant information (both of which it seeks to permanently redact from the public record in accordance with Parts 10 and 11 of the Practice Direction, respectively), and in green outline for information for which Elexicon seeks confidential treatment (in accordance with Parts 5 and 6 of the Practice Direction).

Elexicon will imminently upload Appendix A to the ShareFile file sharing platform hosted by Torys LLP, where eligible parties that have signed the Declaration and Undertaking will be able to access a password-protected version of it, consistent with the process used in respect of the Application. Eligible parties may contact Daniel Gralnick from Torys LLP at dgralnick@torys.com to obtain the password to access Appendix A. In addition, in respect of the Mercer executive compensation benchmarking reports (filed as 4-CCC-58, Attach ~~12~~ & ~~23~~), due to the highly sensitive nature of the compensation information, which is personal information, this document will be saved as a separate file within the ShareFile platform, and will be protected by a different password.

Elexicon requests that portions of 4-CCC-58 containing commercially sensitive labour information be subject to additional protections. Given the participation in this proceeding by Elexicon’s labour union (“**PWU**”), Elexicon 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 PWU. While Elexicon has 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 & Undertaking. Elexicon understands that the Board typically

grants access to confidential documents to a party's counsel, experts or consultants that have signed the Declarations & Undertaking.

In respect of the PWU, Elexicon requests that only external counsel and/or external consultant(s) representing the PWU in this proceeding be permitted to have access to the unredacted document containing commercially sensitive labour information, and, for external consultants, as a condition of obtaining access, the external consultant be required to execute and file (i) the standard Declaration & Undertaking, and also (ii) an affidavit or sworn declaration confirming that they are at arms-length from the PWU and are not (and will not be) involved in any way in collective bargaining on behalf of the PWU 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.¹

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

Sincerely,

A handwritten signature in black ink that reads "D. Coban". The signature is written in a cursive, slightly slanted style.

Daliana Coban

cc: Erin Stevens, Elexicon Energy Inc.

¹ EB-2021-0110, Hydro One Networks Inc., Decision on Blue Page Update, Confidentiality Request and Reply on Expert Evidence and Procedural Order No. 2 (October 25, 2021), pp. 9-10.

Schedule "A"

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
6-Staff-148, Attach. 2_Tax Return 2018 Veridian Connections Inc.	9-11, 20 -21, 23-24 (Part 2 pdf pp 10-12, 21 -22, 24-25)	Confidential	N	<p>Cybersecurity Risk: The redacted information describes technical details and measures related to cyber security enhancements, including system design architecture, specific software solutions used by Elexicon, and specific cybersecurity protocols used to protect key infrastructure. The redacted information also describes the identification and assessment of cyber security vulnerabilities, including those vulnerabilities that the security enhancements address. Public disclosure of this information poses a cybersecurity risk as contemplated in the Practice Direction, Appendix A, part (c).</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the confidential treatment of similar information, including in this proceeding.²</p>
6-Staff-148, Attach. 4_Tax Return 2019 Veridian Connection Inc.	9-11 (Part 2 pdf pp 286-288)			
6-Staff-148, Attach. 6_Tax Return 2019 Elexicon Energy Inc.	9, 12-13, 22 -23, 25-26 (Part 2 pdf pp 531, 534-535, 544 -545, 547-548)			
6-Staff-148, Attach. 7_Tax Return 2020 Elexicon Energy Inc.	9, 11-13, 20, 22 -23, 25-26 (Part 2 pdf pp 660, 662-			

² EB-2025-0312, Elexicon Energy Inc., Decision on Issues List and Confidentiality (April 10, 2026), pp. 5-6.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
	664, 671, 673 -674, 676-677)			
6-Staff-148, Attach. 8_Tax Return 2021 Elexicon Energy Inc.	9, 11-13, 20, 22 -23, 25-27 (Part 2 pdf pp 817, 819-821, 828, 830 -831, 833-835)			
6-Staff-148, Attach. 9_Tax Return 2022 Elexicon Energy Inc.	9-10, 12-14, 23, 25-26, 28-30 (Part 2 pdf pp 939-940, 942-944, 953, 955-956, 958-960)			
6-Staff-148, Attach. 10_Tax Return 2023 Elexicon Energy Inc.	9-10, 12-14, 18, 22, 25-26, 28-30 (Part 2 pdf pp 1061-1062, 1064-1066, 1070, 1074, 1077-			

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
	1078, 1080-1082)			
4-CCC-51, Appendix A – Dx NEXT RFP Final	38, 56-61, 65, 68, 72-75, 77, 92, 130, 134-135, 139, 142, 146, 172, 174, 178, 179, 180, 183-184 (Part 3 pdf pp 47, 65-70, 74, 77, 81-84, 86, 101, 139, 143-144, 148, 151, 155, 181, 183, 187-189, 192-193)	Confidential	N	Cybersecurity Risk: The redacted information describes technical details and measures related to cyber security enhancements, including system design architecture, certain specific software solutions used by Elexicon, and specific cybersecurity protocols used to protect key infrastructure. The redacted information also describes the identification and assessment of cyber security vulnerabilities, including those vulnerabilities that the security enhancements address. The redacted information also contains sensitive software version information, which may be used to identify version-specific vulnerabilities. Public disclosure of this information poses a cybersecurity risk as contemplated in the Practice Direction, Appendix A, part (c).
4-CCC-51, Appendix G – B.1a Dx Next – Board Presentation 11-02-2023 Final_IJB	16 (Part 3 pdf p 237)			

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
4-CCC-51, Appendix D – Evaluation Matrix Template	13, 19 (Part 3 pdf pp 207, 213)			
4-CCMBC-12	2 (Part 3 pdf 246)			
4-SEC-78	2-3 (Part 1 pdf p 3)			
1-QMA-3, Attach 1 Business Continuity Plan Overview	9-10 (Part 3 pdf pp 261-262)			
4-CCC-51, Appendix G – B.1a Dx Next – Board Presentation 11-02-2023 Final_IJB	6, 8, 10-11 (Part 2 pdf pp 227, 229, 231-232)	Confidential	Y	Third-Party Pricing Information: The redacted information consists of a detailed breakdown of the estimated third-party pricing structure for the Dx NEXT project. This information is presumed confidential under the Practice Direction, Appendix B, parts 1 and 2.
4-CCC-51, Appendix G – B.1a Dx Next – Board Presentation 11-02-2023 Final_IJB	4 (Part 2 pdf p 4)	Confidential	N	Commercially Sensitive and Proprietary Consultant Methodology: The redacted information consists of a description of a proprietary analytical frameworks that belongs to IBM. The information in question is proprietary and of a commercially sensitive nature. Elexicon has been advised by IBM that the public disclosure of this

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
				information could prejudice the commercial interest and competitive position of the consultant, as it would allow other consultants to ascertain aspects of the methodology and thereby interfere with IBM's ability to carry on business offering such analysis (Practice Direction, Appendix (a)((i),(iv))).
4-CCC-51, Appendix A – Dx NEXT RFP Final	13, 43, 88, 109 (Part 3 pdf pp 22, 52, 97, 118)	Confidential	Y	<p>Third-Party Commercially Sensitive Information: The redacted information consists of pricing-related commercial terms for the software cost components of the Dx NEXT project. The vendor has advised Elexicon that publicly disclosing this information could prejudice the vendor's competitive position in providing similar software services to other potential clients, and can impair its ability to negotiate agreements with other customers. This information is commercially sensitive and, if disclosed, could prejudice the competitive positions of the vendor, interfere with future negotiations, and may produce a significant loss to the vendor. (Practice Direction, Appendix B, parts 1 and 2, Appendix A, parts (a)(i), (iii) and (iv)).</p> <p>Prior Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the confidential treatment of similar information, including in this proceeding.³</p>
4.1-PWU-09	3 (Part 3 pdf p 251)			
4-CCC-50	4 (Part 3 pdf p 5)			
4-CCC-51, Attachment Appendix E Dx NEXT Scoring	All (Part 3 pdf pp 219-220)	Confidential	N	Competitive third-party pricing and bid-related information: The redacted information consists of a spreadsheet that summarizes Elexicon's evaluation of the bids received in respect of the Dx NEXT project. The information contains detailed

³ EB-2025-0312, Elexicon Energy Inc., Decision on Issues List and Confidentiality (April 10, 2026), pp. 6-7.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
Matrix_Final Summary				<p>information about unsuccessful bids, which can prejudice the competitive position of those bidders. This information is analogous to (and will result in the same harms as) the disclosure of a copy of an unsuccessful bid received as part of a competitive procurement, which is presumed to be confidential under the Practice Direction (Appendix B, part 4). Further, the spreadsheet includes pricing details proposed by all bidders in respect of components of the Dx NEXT project, including unit costs for licensing. This information is presumed to be confidential (Practice Direction, Appendix B, parts 1 and 2).</p> <p>Because of the heightened commercial sensitivity of this information, and the significant harm that the public disclosure of this information can have on the commercial interest of the bidders, Elexicon requests treating the entire document confidentially, but notes that an unpopulated template of the same evaluation matrix has been filed on the public record as 4-CCC-51 Appendix F Dx NEXT Scoring Matrix Final Summary Ranking.</p>
12-Staff-75, Attach 1 CCRAs	2, 21, 40, 42, 43, 71, 73, 74, 106 (Part 2 pdf pp 1399, 1418, 1437, 1439-1440, 1468, 1470-1471, 1503)	Confidential	N	<p>Physical Security Risk: The confidential information consists of information contained in Connection Cost Recovery Agreements that identifies the location of specific assets and the length of certain lines which, based on information provided by Hydro One, Elexicon understands could be exploited by malicious actors (including to carry out theft) and could adversely affect the safety and security of Hydro One's transmission facilities.</p>

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
IRR	Page #			
				Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the confidential treatment of similar information. ⁴
2-Staff-65, Attach 2_B&B BCA – 2849 Durham Regional Highway 2	23, 38 (Part 2 pdf pp 1233, 1248)	Confidential	N	Physical Security Risk: The redacted information describes access points, security vulnerabilities, and security measures used to protect Elexicon’s assets. Public disclosure of this information poses a physical security risk as contemplated in the Practice Direction, Appendix A, part (c).
2-Staff-65, Attach 1_B&B BCA – 195 Progress Drive	20-21, 31-32 (Part 2 pdf pp 1195-1196, 1206-1207)			
2-Staff-65, Attach 3_B&B BCA – 55 Taunton Road East	26, 56 (Part 2 pdf pp 1278, 1308)			
2-Staff-65, Attach 5_B&B BCA – 100 Taunton Road East	11, 12, 13, 27, 36, 47 (Part 2 pdf pp 1357-1359, 1373, 1382, 1393)			

⁴ EB-2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality and Procedural Order No. 8 (September 26, 2024), pp. 10-11.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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2-Staff-65, Attach 4_B&B BCA – 1395 Thorah Concession Road 6	18, 31 (Part 2 pdf pp 1330, 143)			
1-SEC-01, Attach 1_Board Materials	14	Permanent (Solicitor-Client Privilege)	Y	<p>Solicitor-Client Privileged Information: The redacted information contains legal advice provided by Elexicon’s external legal counsel. (Practice Direction, Appendix B, part 6). Elexicon is seeking to permanently redact this information.</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the permanent redaction of similar information.⁵</p>
1-SEC-03, Mercer Retainer	2 (Part 1 pdf p 34)	Confidential	Y	<p>Third-Party Consultant Pricing Information: The retainer agreements entered into between Elexicon and its consultants include pricing terms agreed to that resulted from a process of competitive negotiations (Practice Direction, Appendix B, parts 1 and 2, Appendix A, part (a)(i), (iii) and (iv)). Elexicon is advised that disclosing this information on the public record could prejudice the respective competitive position of its consultants vis-à-vis their respective competitors, and prejudice the consultants in any ongoing or future negotiations to provide similar services to other potential clients.</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously</p>
1-SEC-03, Clearspring Retainer	2-3 (Part 1 pdf pp 24-25)			
1-SEC-03, Innovative Retainer	2-3, 8, 15-16 (Part 1 pdf pp 7-8, 13, 20-21)			

⁵ EB-2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality and Procedural Order No. 8 (September 26, 2024), p. 5.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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				approved the confidential treatment of similar information. ⁶
4-CCC-58, Exec Compensation	4, 6-7	Confidential	N	<p>Commercially sensitive information that can prejudice Elexicon’s competitive position in the labour market: The redacted information pertains to executive compensation, including target total compensation and incentive pay information, relative to market median. If disclosed, this information would permit a person to assess Elexicon’s competitiveness in the labour market for these positions and could adversely impact Elexicon’s ability to attract, hire and retain individuals for these and similar positions (Practice Direction, Appendix A, part (a)(i) and (iv)).</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the confidential treatment of similar information.⁷</p>
4-CCC-58, CEO Compensation	2-4, 6-7, 12-13			
4-CCC-58, Exec Compensation	4, 6-7	Permanent (Personal Information)	Y	<p>Compensation Information related to Identifiable Individuals: The redacted information includes the position titles and salaries of identifiable executives whose compensation has not previously been disclosed publicly by the company. The information also consists of market comparison information (including the P25, P50, and P75 compensation levels). Because one person is employed for each position, disclosure of the job title and market data will reveal the salary and</p>
4-CCC-58, CEO Compensation	2-4, 6-7, 12-13			

⁶ EB-2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality and Procedural Order No. 8 (September 26, 2024) at page, pp. 5-6.

⁷ EB-2025-0252, Alectra Utilities Corporation, Decision and Order on Confidentiality (May 6, 2026), pp. 3-4.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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				<p>compensation attached to the position. Consistent with the definition of “personal information” under the Freedom of Information and Protection of Privacy Act, RSO, 1990, CF 31 (“FIPPA”), this information, which is of a private and personal nature, is deemed to be confidential pursuant to the Practice Direction, part 10.</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the permanent redaction of similar information.⁸</p>
4-CCC-58	3 (Part 3 pdf p 242)	Confidential (Labour-Sensitive)	Y	<p>Labour Sensitive Forecast Information: The redacted information identifies the forecasted annual labour escalation rates, beyond the scope of the present collective agreement, that Elexicon has incorporated into its 2029-2031 compensation budgets for unionized employees. This information is sensitive from a labour relations perspective because it can impact future collective bargaining negotiations (Practice Direction, Appendix B, part 8 and Appendix A, part (a)(iii)).</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the confidential treatment of similar information, including in this proceeding.⁹</p>
6-Staff-148, Attach. 2_Tax Return 2018	1-127	Permanent (Non-Relevant)	N/A	<p>Non-Relevant HST Numbers: The redacted information consists of registered business numbers and Ontario corporation numbers of Elexicon,</p>

⁸ EB-2025-0252, Alectra Utilities Corporation, Decision and Order on Confidentiality (May 6, 2026), pp. 3-4.

⁹ EB-2025-0312, Elexicon Energy Inc., Decision on Issues List and Confidentiality (April 10, 2026), pp. 3-5.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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Veridian Connections Inc.	(Part 2 pdf pp 2-128)			<p>affiliates, and third parties. This information is not relevant because it will not provide any assistance to the OEB or intervenors with respect to the issues in this proceeding.</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the permanent redaction of similar information, including in this proceeding.¹⁰</p>
6-Staff-148, Attach. 3_Tax Return 2018 Whitby Hydro	1-60, 95-147 (Part 2 pdf pp 130-189, 224-276)			
6-Staff-148, Attach. 4_Tax Return 2019 Veridian Connection Inc.	1-118 (Part 2 pdf pp 278-395)			
6-Staff-148, Attach. 5_Tax Return 2019 Whitby Hydro	1-125 (Part 2 pdf pp 397-521)			
6-Staff-148, Attach. 6_Tax Return 2019 Elexicon Energy Inc.	1-128 (Part 2 pdf pp 523-650)			
6-Staff-148, Attach. 7_Tax Return 2020 Elexicon Energy Inc.	1-156 (Part 2 pdf pp 652-807)			

¹⁰ EB-2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality, Issues List, Proposed Expert Evidence and Procedural Order No. 3 (February 5, 2024), p. 3; EB-2025-0312, Elexicon Energy Inc., Decision on Issues List and Confidentiality (April 10, 2026), p. 6; EB-2024-0115, Hydro Ottawa Limited, Decision on Confidentiality (September 9, 2025), p. 3.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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6-Staff-148, Attach. 8_Tax Return 2021 Elexicon Energy Inc.	1-121 (Part 2 pdf pp 809-929)			
6-Staff-148, Attach. 9_Tax Return 2022 Elexicon Energy Inc.	1-121 (Part 2 pdf pp 931-1051)			
6-Staff-148, Attach. 10_Tax Return 2023 Elexicon Energy Inc.	1-122 (Part 2 pdf pp 1053-1174)			
2-Staff-75, Attach 1 CCRAs	7, 10, 25, 29, 46, 49, 77, 80, 110, 116 (Part 2 pdf pp 1404, 1407, 1422, 1426, 1443, 1446, 1474, 1477, 1507, 1513)			
6-Staff-148, Attach. 2_Tax Return 2018 Veridian Connections Inc.	1, 9, 12, 15, 19, 22, 25, 80-81, 116-121	Permanent (Non-Relevant)	N/A	Non-Relevant Tax Information: The redacted information consists of names, post-secondary affiliations, job titles, qualifications, employment history and salary information attributable to specific

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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	(Part 2 pdf pp 2, 10, 13, 16, 20, 23, 26, 81-82, 117-122)			<p>Elexicon employees. This information is not relevant because it will not provide any assistance to the OEB or intervenors with respect to the issues in this proceeding.</p> <p>Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved the permanent redaction of similar information, including in this proceeding.¹¹</p>
6-Staff-148, Attach. 4_Tax Return 2019 Veridian Connection Inc.	1, 9, 12, 16, 25, 106-111 (Part 2 pdf pp 278, 286, 289, 293, 302, 382-388)			
6-Staff-148, Attach. 6_Tax Return 2019 Elexicon Energy Inc.	1, 10, 14, 17, 21, 23, 27, 40, 119-124 (Part 2 pdf pp 523, 532, 536, 539, 543, 545, 549, 562, 641-646)			
6-Staff-148, Attach. 7_Tax Return 2020 Elexicon Energy Inc.	1, 9, 14, 18, 21, 24, 27, 37, 119, 143-145			

¹¹ EB-2024-0115, Hydro Ottawa Limited, Decision on Confidentiality and Issues List (June 24, 2025), pp. 2-3; EB-2025-0312, Elexicon Energy Inc., Decision on Issues List and Confidentiality (April 10, 2026), p. 6.

Reference		Type of Redaction	Presumptive Confidential Treatment (Y/N)	Explanation and Rationale
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	(Part 2 pdf pp 652, 660, 665, 669, 672, 675, 678, 688, 770, 794-796)			
6-Staff-148, Attach. 8_Tax Return 2021 Elexicon Energy Inc.	1, 9, 14, 18, 21, 24, 27, 40, 111-113 (Part 2 pdf pp 809, 817, 822, 826, 829, 832, 835, 919-921)			
6-Staff-148, Attach. 9_Tax Return 2022 Elexicon Energy Inc.	1, 10, 15, 20, 24, 27, 30, 43, 112-114 (Part 2 pdf pp 931, 940, 945, 950, 954, 957, 960, 973, 1042-1044)			
6-Staff-148, Attach. 10_Tax Return 2023 Elexicon Energy Inc.	1, 10, 15, 19, 23, 27, 30, 43, 112-114			

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	(Part 2 pdf pp 1053, 1062, 1067, 1071, 1075, 1079, 1082, 1095, 1164-1166)			

Appendix “A”

(Intentionally omitted from public version)