

June 8, 2026

VIA RESS

Mr. Ritchie Murray
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") – Supplemental request for confidential treatment of information interrogatory response attachment

The Applicants filed interrogatory responses in the above-noted proceeding on April 22, April 24, May 20, and May 22, 2026. The Applicants filed the following revised interrogatory attachments: L-F3-Pinto-001, Attachment 3, L-D2-Staff-118, Attachment 1, and L-D2-Staff-117, Attachment 2 on May 25, 26, and 28 respectively. (collectively, the "**Revised Attachments**").

In the Applicants' April 28, 2026 and May 22, 2026 confidentiality request letters, the Applicants sought 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 in the Revised Attachments, in accordance with Rule 10 of the Ontario Energy Board's ("**OEB**") *Rules of Practice and Procedure* and the OEB's *Practice Direction on Confidential Filings* (the "**Practice Direction**").

The Applicants hereby request the OEB's approval to (i) permanently redact from the public record information that is non-relevant and/or (ii) treat as confidential certain additional information in the Revised Attachments (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 and 11.1.2 of the Practice Direction.

The Applicants have attached "**Appendix B**" – excluded from the public version of this letter – which includes the confidential (non-redacted) versions of the relevant document. In "**Appendix B**", information for which the Applicants seek confidential treatment on the record has been marked for redaction with a red box. The Applicants applied blue boxes for non-relevant information which the Applicants seek to permanently redact from the OEB record.

This confidentiality request is in addition to the requests for permanent redaction and/or confidential treatment of the other information in the Revised Attachments as set out in the Applicants' April 28, 2026 and May 22, 2026 confidentiality request letters.

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, appearing to read "A. Brown". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Andrea Brown

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

Appendix A – Table of Redactions

Exhibit Reference		Presumptive Confidential Treatment (Yes/No)	Type of Request	Explanation and Rationale
L-D2-Staff-118, Attachment 1	Page 61 ('Other' – first bullet)	No	Confidential Treatment	Commercially Sensitive Information and Competitive Prejudice: The redacted information relates to confidential debt terms of OPG and the Canadian 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. Any information that could reveal the terms of a CIB loan is highly confidential, as access to such information could give other parties information not otherwise available that could provide a commercial advantage unrelated to this proceeding in future dealings with CIB (Practice Direction, Appendix A, Part (a)(i), (iv), and (b)). Previous Treatment: In this proceeding, the OEB approved confidential treatment of debt terms of the CIB loan (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, Item #6, at p. 4; Practice Direction, Appendix A, Part (e)). The proposed redaction contains information that similarly relates to the debt terms of the CIB loan. (See also EB-2024-0063, Decision on Confidentiality, December 9, 2024).
L-D2-Staff-118, Attachment 1	Page 61 ('Other' – second bullet)	No	Confidential Treatment	Commercially Sensitive Information and Impact on Negotiations: The redacted information consists of non-public, proposed terms in negotiations that are currently ongoing.

				This information concerns the parties' current bargaining positions, which is not publicly available, and may be leveraged by third-parties in other negotiations resulting in a commercial advantage to those third-parties, unrelated to the proceeding. The confidentiality of these sorts of negotiation details is essential to ensuring 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 negotiations (Practice Direction, Appendix A, Part (a)(i), (ii), (iii)).
L-D2-Staff-118, Attachment 1	Page 61 ('Other' – fourth bullet)	No	Confidential Treatment	Commercially Sensitive Information and Competitive Prejudice: The redacted information relates to certain details of the DNNP funding strategy, and the process undertaken by the Applicants, CIB, Canada Growth Fund, and Building Ontario Fund. The nature of this process and details surrounding it is not publicly known and this information is consistently treated in a confidential manner by the parties. If this information is disclosed on the public record, the parties would be prejudiced in future negotiations, as future counterparties would benefit from the analysis and strategy underlying the DNNP funding strategy resulting in leverage they would not otherwise have, to the detriment of the Applicants, the other financing parties, and ultimately ratepayers (Practice Direction, Appendix A, Part (a)(i, iii), (b)). Additionally, the Applicants note that this information is covered by a confidentiality agreement between the parties. While the Applicants' acknowledge that the existence of a confidentiality agreement does not automatically result in confidential treatment, the Applicants' submit that the existence of the confidentiality agreement in this case is indicative of the sensitivity that all parties ascribe to this information and, when read together with the commercial sensitivity and potential for competitive prejudice outlined above, is a relevant factor in

				considering the confidential nature of this information (Practice Direction, Part 5).
L-D2-Staff-118, Attachment 1	Page 62	No	Confidential Treatment	Commercially Sensitive Information and Competitive Prejudice: The redacted information consists of an illustrative depiction of the potential outcome of ongoing negotiations. Disclosure of this information on the public record would prejudice both the Applicants and the other parties to the negotiations. This information concerns the parties' current bargaining positions, which is not publicly available, and may be leveraged by third-parties in other negotiations resulting in a commercial advantage to those third-parties, unrelated to the proceeding. The confidentiality of these sorts of negotiation details is essential to ensuring 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 negotiations (Practice Direction, Appendix A, Part (a)(i), (ii), (iii)).
L-D2-Staff-117- Attachment 2	Page 47	No	Confidential Treatment	Commercially Sensitive Information and Competitive Prejudice: The information relates to confidential debt terms of the Canadian Infrastructure Bank (CIB). The information provides assumptions and details that could be used to discern the rate of the CIB loan. 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. Any information that could reveal the terms of a CIB loan is highly confidential as access to such information could give other parties information not otherwise available that could provide a commercial advantage unrelated to this proceeding in future dealings with CIB (Practice Direction, Appendix A, Part (a)(i), (iv), and (b)).

				Previous Treatment: In its April 13, 2026 decision, the OEB approved confidential treatment of debt terms of the CIB loan (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, Item #6, at p. 4) ((Practice Direction, Appendix A, Part (e)). The proposed redaction contains information that similarly relates to the debt terms of the CIB loan. See also EB-2024-0063 (Decision on Confidentiality, December 9, 2024).
L-D2-Staff-117-Attachment 2	Pages 51 to 98	No	Confidential Treatment	Commercially Sensitive Information and Competitive Prejudice: The redacted information contains the comprehensive life-cycle operating cost estimate for the DNNP. It contains the Applicants' plans for staffing, fuel procurement, waste management, decommissioning, maintenance and outage planning, etc. This information is highly commercially sensitive. If publicly disclosed, the information could allow competitors to reverse-engineer the Applicants' operational plan, undermining the first mover advantage of the Applicants and the counterparties to the Integrated Project Agreement. The Applicants did not have access to this information when developing its plans, so public disclosure would also give competitors an unfair advantage by allowing them to use the Applicants' proprietary information to develop their own projects (Practice Direction, Appendix A, Part (a)(i) and (b)). Impact on Future Negotiations: The redacted information contains details of service contracts and vendor pricing. These details would harm future procurements and negotiations, both for Units 2 to 4 and for ongoing commercial negotiations. If vendors, consultants and counterparties had access to this information, the Applicants may receive increased bid prices and have weakened negotiation leverage with its contracting partners (Practice Direction, Appendix A, Part (a)(iii)). Third Party Commercially Sensitive Information: The redacted information contains technical and commercial information belonging to the Applicants and its counterparties, including proprietary designs, methodologies and procurement

				pricing that the Applicants and its counterparties have consistency treated as confidential. Public disclosure of this information could prejudice the competitive positions of these parties and interfere with commercial negotiations, producing significant financial loss to them (Practice Direction, Appendix A, Parts (a)(i), (iii), (iv) and (b)). Previous Treatment: In its April 13, 2026 Decision and Order on Confidentiality, the OEB approved confidential treatment of the Integrated Project Agreement on the basis that it provides a “roadmap” of the delivery model which is commercially sensitive and could harm OPG’s position in future negotiations (EB-2025-0297, Decision and Order on Confidentiality – Pre-Filed Evidence, April 13, 2026, at p. 10). The same reasoning applies to the redacted information, which provides a roadmap for the operation of the SMR (Practice Direction, Appendix A, Part (e)).
L-F3-Pinto-001, Attachment 3	Pages 2144-2145, and 2206	N/A	Permanent Redaction for Non-Relevance	Non-Relevant Information: The redacted information consists of information that is related to a fire extinguisher inspection and reveals the location of assets essential to emergency operations, which is highly security sensitive. Given the nature of the information redacted, this information is not relevant to the determination of payment amounts in this proceeding. This information is marked for permanent redaction as it would otherwise enable malicious actors to exploit vulnerabilities in building design or condition in order to subvert security measures, disrupt, and commit a theft or sabotage on OPG assets without assisting intervenors or the OEB in any of the issues to be decided as part of this proceeding (Practice Direction, Part 11).

Appendix B – Unredacted Documents for OEB Review Only