TORYS LLP

79 Wellington St. W., 28th Floor
Box 270, TD South Tower
Toronto, Ontario M5K 1N2
P. 416.865.0040| F. 416.865.7380

www.torys.com

Jonathan Myers
jmyers@torys.com
P. 416.865.7532

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Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Mr. Ritchie Murray, Registrar

Dear Mr. Murray:

Re: EB-2026-0164: Hydro One Networks Inc. ("Hydro One") and Hydro One Sault Ste. Marie LP ("HOSSM") 2028-2032 Joint Rate Application for Electricity Transmission and Distribution Rates (the "Application") – Request for Confidential Treatment of Information

We are legal counsel to Hydro One and HOSSM, the applicants in the above-referenced proceeding. Hydro One and HOSSM filed the Application on October 7, 2026. Pursuant to Rule 10.01 of the OEB's *Rules of Practice and Procedure* and the OEB's *Practice Direction on Confidential Filings* (the **"Practice Direction"**), Hydro One and HOSSM hereby request OEB approval (i) for confidential treatment under Parts 5 and 6 of the Practice Direction (the "**Confidential Information"**), and (ii) to permanently redact from the public record, information that is (a) not relevant pursuant to Part 11 of the Practice Direction, and (b) personal information pursuant to Part 10 of the Practice Direction, for certain information contained in the Application (collectively, the "**Redacted Information**").

The Redacted Information has been redacted from the public version of the Application filed with the OEB. Appendix "B" hereto contains a compilation of the unredacted (confidential) versions of the relevant documents, each of which is marked (i) "Confidential Version", (ii) "Confidential – Non-Relevant Version", or (iii) "Confidential, Non-Relevant, and Personal Information Version", as applicable, and includes highlights of the specific portions for which Hydro One or HOSSM requests confidential treatment or permanent redaction, as appropriate. For ease of reference, the applicants have highlighted personal information in red, non-relevant information in green, and Confidential Information in yellow. The applicants seek permanent redaction of the information

highlighted in red and green. Confidential Information, which is highlighted in yellow, does not include permanently redacted personal or non-relevant information.[1]

Hydro One has filed fully confidential attachments to three Investment Summary Documents ("ISDs") concerning physical security and cybersecurity investments: GSP Section 4.11, G-GP-10 (Physical Security Upgrades); GSP Section 4.11, G-GP-11 (Cybersecurity and Digital Protection); and GSP Section 4.11, G-GP-30 (Enterprise Security Platforms and Controls). As described in the table below, these attachments contain extensive Confidential Information that, if publicly disclosed, could create significant threats to the physical security and cybersecurity of Hydro One's system. This information is pervasive throughout these attachments and is interwoven with the description of the need for, and scope of, each investment. Conventional line-by-line redaction would therefore be less reliable in capturing all of the sensitive information, including information that could be pieced together from surrounding context, and administratively burdensome for Hydro One, the OEB and parties. Given the sensitivity of this information, Hydro One has filed a public version of each ISD that summarizes the nature of the investments and discloses the investment amounts, and the more detailed discussions are contained in the fully confidential attachments.

The applicants submit that treating the three attachments as confidential in their entirety, together with the provision of public versions of each ISD, achieves the Practice Direction's objectives of "transparency and openness and the need to protect information that has been properly designated as confidential",[2] while also reducing the complexity and administrative burden of managing the request. The context of this request is important. Canadian utilities face growing physical security and cybersecurity threats, which can affect service reliability and customer experience. As an illustration, in 2025, Nova Scotia Power experienced a significant cyberattack that compromised the personal information of hundreds of thousands of current and former customers, including names, addresses, dates of birth and, in some cases, sensitive financial and identification data.[3] The breach also disrupted customer-facing systems, including automated billing processes, leading to billing challenges and concerns about identity theft and fraud for affected customers. Hydro One has determined that the proposed approach for these specific documents is necessary to protect ratepayers from the serious consequences that could materialize if its security and cybersecurity information were publicly disclosed, while still maximizing the transparency of the public record in this proceeding.

[1] To comply with RESS' 35MB size limit, Hydro One has sectionalized Appendix B into two volumes. All records within Appendix B are included in Volume 1 with the exception of (1) E-09-05, Attachment 1 (Hydro One 2025 Tax Return) and (2) E-09-05A, Attachment 1 (HOSSM 2025 Tax Return) which are filed as part of Volume 2. Hydro One has not sectionalized the version of Appendix B that will be included in Torys' ShareFile platform available to eligible parties that have signed the Declaration and Undertaking.

[2] Practice Direction, Part 1.

[3] See M12273, Nova Scotia Power, Board Inquiry into Nova Scotia Power's Cybersecurity Incident (December 22, 2025).

In accordance with section 6.1 of the Practice Direction, representatives of parties that have signed a Declaration and Undertaking in the form prescribed by the OEB will be able to access the Confidential Information included within the Application. The applicants will upload confidential versions of all documents containing Confidential Information to the ShareFile file sharing platform hosted by Torys LLP. Eligible parties that have signed the Declaration and Undertaking will be able to access password-protected versions of the documents by contacting Daniel Gralnick at dgralnick@torys.com to obtain the password to access the Confidential Information within Appendix "B". For greater certainty, such parties will not be provided with access to any of the personal information or information that is not relevant to the proceeding.

In accordance with Section 5.1.4(b) of the Practice Direction, the table included in Appendix "A" hereto describes the particular information for which Hydro One requests redaction, and outlines the basis for each of the requests.

Please do not hesitate to contact the undersigned if you have any questions regarding this request.

Yours truly,



Jonathan Myers

cc: Arlen Sternberg, *Torys LLP*
Daliana Coban, *Torys LLP*
Kathleen Burke, *Hydro One Networks Inc.*

APPENDIX A

Exhibit Reference	Page Reference	Type of Request	Presumptive Confidential (Yes/No)	Explanation and Rationale
DSP Section 3.11, D-SS-04 (Energy Storage Solutions)	12	Confidential	Yes	**Third-Party Unit Pricing Information:** The information consists of estimated unit pricing for residential BESSs, which is presumptively confidential (Practice Direction, Appendix B, Part 1). Further, disclosure could interfere with Hydro One's future procurement processes by establishing price benchmarks that could serve as floor prices in negotiations, limiting Hydro One's ability to negotiate more favourable rates and potentially resulting in higher costs borne by ratepayers (Practice Direction, Appendix A, parts (a)(i), (iii), and (iv)).
DSP Section 3.11, D-SS-04, Attachment 2 (RFP Results Report)	5 (Table 1), 9 (Table 2)	Confidential	Yes	**Unsuccessful Bid Information:** The redacted information in Table 1 consists of the capital cost per residential BESS installation, annual OM&A (or annual service fee) per BESS installation, and NPV values derived from proposals received in Hydro One's RFP for residential BESS installations. The NPV values, read with assumptions regarding economic analysis on the public record, can be used to deduce the capital and OM&A costs in the table. Table 2 provides similar information in respect of grid-scale BESS installations. With the exception of the "HONI-Owned" row in Table 2 (addressed below), these figures are derived from bids submitted by proponents in separate RFPs for residential and grid-scale BESS conducted in or around 2025. Hydro One has not awarded a contract under either procurement and instead intends to carry out further procurements for these BESS services. These figures therefore reproduce pricing from

Exhibit Reference	Page Reference	Type of Request	Presumptive Confidential (Yes/No)	Explanation and Rationale
				unsuccessful bids received as part of a competitive procurement process. Although the tables do not reproduce copies of the bids, the pricing is the most commercially sensitive component of any bid, and its disclosure would result in the same harms as disclosing the bids themselves, which are presumed to be confidential (Practice Direction, Appendix B, Part 4). **Interfere with Future Procurement and Negotiations:** Because Hydro One intends to carry out additional procurements for these BESS services in the future rate period, disclosure of Tables 1 and 2 (for clarity, the entirety of each table) could interfere with Hydro One's future procurement processes by establishing price benchmarks that could serve as floor prices in negotiations, limiting Hydro One's ability to negotiate more favourable rates and potentially resulting in higher costs borne by ratepayers (Practice Direction, Appendix A, parts (a)(i), (iii), and (iv)). **Sensitive Third-Party Unit Pricing:** In addition, these values represent sensitive commercial third-party unit pricing for the BESS installations, including line items for per-installation capital costs and the vendor's annual maintenance or service costs per installation (or, in the case of the NPV values, information from which that unit pricing can be deduced), which is presumed to be confidential (Practice Direction, Appendix B, Part 1). In the alternative, this information is commercially sensitive pricing information that, if publicly disclosed, could prejudice the third-party vendors' competitive positions by revealing to their competitors their cost of providing the services in question (Practice Direction,

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				Appendix A, Part (a)(i) and (iv)). This risk is heightened for Table 2, where the "HONI-Owned" row is based on the pricing for a comparable grid-scale BESS project currently identified on the public record. Disclosure would therefore reveal an identifiable vendor's actual pricing and could prejudice that vendor in future negotiations to provide similar services to other clients. Similarly, the EaaS row in Table 2 reflects the pricing of the only proponent that advanced to the economic evaluation in the grid-scale RFP, making the information more readily attributable to a specific proponent.
GSP Section 4.11, G-GP-3 (Facilities and Accommodations)	54 (Figure 34)	Confidential	No	**Physical Security:** The figure in question reveals the specific location of the Dryden Heliport. If disclosed, this information could be exploited by a malicious actor to facilitate accessing the heliport, posing a risk of theft and/or vandalism in respect of Hydro One's helicopters (Practice Direction, Appendix A, Part (c)). Hydro One asserts that these precautions are appropriate due to the value of its helicopters, and the significant impact to system reliability that would ensue if these assets were stolen, damaged or vandalized.
GSP Section 4.11, G-GP-13 (Operating Technology Facilities Sustainment)	4, 6	Confidential	No	**Physical Security:** The redacted information identifies specific physical security vulnerabilities (p. 6) and a specific resiliency gap (p. 4) at an identified critical control centre. Public disclosure of this information could be used by malicious actors to identify and exploit security vulnerabilities, circumvent protective measures, and sabotage the operation of the control centre. Because this information pertains to an identifiable control centre that forms part of the backbone of Hydro One's system, public disclosure of this information could compromise

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				the reliable operation of Hydro One's transmission and distribution systems (Practice Direction, Appendix A, Part (c)).
GSP, Section 4.11, G-GP-10, Attachment 1 (Physical Security Upgrades Confidential Attachment)	All	Confidential	No	**Physical Security:** The confidential Attachment 1 to Exhibit G-GP-10 describes Hydro One's physical security program, including detailed information about its security investments, infrastructure vulnerabilities, protective measures, and planned upgrades at specific facilities. Public disclosure of this information could be exploited by malicious actors to identify security gaps and circumvent protective measures, potentially resulting in physical security breaches at Hydro One's critical electricity infrastructure (Practice Direction, Appendix A, Part (c)). As explained in the body of this letter, given the extent and heightened degree of sensitivity of this information throughout the confidential appendix, Hydro One proposes to redact the confidential appendix in its entirety by omitting it from the public version of the evidence. To maximize the transparency and openness of the public record, Hydro One has prepared and filed with the public version of the Application a non-confidential summary of the investments in question, which is included in the public version of G-GP-10.
GSP Section 4.11, G-GP-11, Attachment 1 (Cybersecurity and Digital Protection	All	Confidential	No	**Cybersecurity:** The confidential Attachment 1 to Exhibit G-GP-11 and the confidential Attachment 1 to G-GP-30 describe Hydro One's enterprise security platforms and controls, including its cybersecurity and digital protection programs and capabilities. These attachments contain detailed information

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Confidential Attachment)				about Hydro One's cybersecurity investments, system design architecture, technical specifications, identified vulnerabilities and capability gaps, risk assessments, security protocols, threat detection, monitoring and preventive security controls, identity, access and data protection measures, security governance and compliance posture, and planned security enhancements across IT and operational technology (OT) environments. Public disclosure of this information could be exploited by malicious actors to identify vulnerabilities and circumvent protective measures, potentially resulting in cybersecurity breaches that could compromise the security and reliability of Hydro One's critical electricity infrastructure (Practice Direction, Appendix A, Part (c)). As explained in the body of this letter, given the extent and heightened degree of sensitivity of this information throughout the confidential attachment, Hydro One proposes to redact the confidential attachment in its entirety by omitting it from the public version of the evidence. To maximize the transparency and openness of the public record, Hydro One has prepared and filed with the public version of the Application a non-confidential summary of the investments in question, which is included in the public version of G-GP-11 and G-GP-30.
GSP Section 4.11, G-GP-30, Attachment 1 (Enterprise Security Platforms and Controls Confidential Attachment)	All			
E-09-05, Attachment 1 (Hydro One 2025 Tax Return)	136-137 (boxes 400 and 500)	Confidential	Yes	**Information Related to Affiliates and Non–Rate Regulated Business Activities:** This information consists of financial information about Hydro One's non-regulated affiliates, including financial information that is comingled with Hydro One's non-regulated affiliates. This information consists of, or is analogous to, non-public financial information about Hydro

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				One's unregulated affiliates, which is presumptively confidential. Furthermore, the information is confidential as the public disclosure of this information could prejudice Hydro One's unregulated affiliates' commercial interests and competitive positions (Practice Direction, Appendix A, Part (a)(i),(iii) and (iv)). In any event, this information is not relevant to the Application and provides no probative value to any issues to be decided by the OEB. **Previous Treatment:** The OEB has previously approved a request for a utility to redact similar financial information, including in tax returns (Practice Direction, Appendix A, Part (e)).[4]
	13-14, 105-111, 139-163,	Non-Relevant and Personal	N/A	**Not Relevant employee information:** The redacted information consists of names, telephone numbers, post-secondary affiliations, job titles, qualifications, employment histories and salary information attributable to specific 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. For completeness, this information is also personal information, except for the employee business telephone numbers. However, the OEB has previously accepted proposed redactions on the basis of non-relevance alone.

[4] EB-2023-0195, Toronto Hydro-Electric System Limited, Decision on Confidentiality and Procedural Order No. 8 (September 26, 2024), pp. 4, 10; EB-2025-0252, Alectra Utilities Corporation, Decision and Order on Confidentiality (May 6, 2026), p. 5 (item 1).

Limited, Decision on Confidentiality and Issues List (June 24, 2025), pp. 2-3.

Exhibit Reference	Page Reference	Type of Request	Presumptive Confidential (Yes/No)	Explanation and Rationale
				Previous Treatment: Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously decided that similar information is not relevant in the context of corporate tax return.[5]
	92-95	Non-Relevant and Personal	N/A	**Non-Relevant Payee Information** The redacted information consists of names and addresses of non-residents that received payments from Hydro One. 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. For completeness, that portion of the payee information that pertains to individuals also consists of personal information. This is because it consists of recorded information about an identifiable individual, including: (i) information relating to financial transactions in which the individual has been involved; (ii) the address of the individual; and (iii) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.[6]
	51	Non-Relevant	N/A	**Non-Relevant Charitable Recipients:** The redacted information identifies organizations that received charitable donations. It is not relevant because it would not assist the OEB or intervenors in addressing any issue in this proceeding.

[5] 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 (items 22-23).

[6] Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31, Section 2(1)(b),(d),(h).

Exhibit Reference	Page Reference	Type of Request	Presumptive Confidential (Yes/No)	Explanation and Rationale
				Previous Treatment: The OEB has previously approved a request for a utility to redact similar information (Practice Direction, Appendix A, Part (e)).[7]
E-09-05, Attachment 1 (Hydro One 2025 Tax Return)	All	Non-Relevant	N/A	**Non-Relevant Business Numbers**: The redacted information consists of registered business numbers and Ontario partnership identification numbers of the applicants, their 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. **Previous Treatment:** Pursuant to Appendix A, part (e) of the Practice Direction, the OEB has previously approved utility requests for the permanent redaction of similar information.[8]
E-09-05A, Attachment 1 (HOSSM 2025 Tax Return)	All			

[7] EB-2025-0252, Alectra Utilities Corporation, Decision on Confidentiality (25 February 2026) p. 4.

[8] 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.

APPENDIX B

[Intentionally omitted from public version]