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

BY EMAIL

October 22, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ritchie Murray:

Re: Ontario Energy Board (OEB) Staff Submission
London Hydro Inc. (London Hydro)
2027 Cost of Service Application
OEB File Number: EB-2026-0056

Please find attached OEB staff's submission in the above referenced proceeding, pursuant to Procedural Order No. 1.

Yours truly,

Arlene Bernardo
Digitally signed by Arlene Bernardo
Date: 2026.10.22 15:43:58 -04'00'

Arlene Bernardo
Advisor, Distribution Rates and Economics

Encl.

cc: All parties in EB-2026-0056



ONTARIO ENERGY BOARD

OEB Staff Submission on Confidentiality

London Hydro Inc.

2027 Electricity Distribution Rates

EB-2026-0056

October 22, 2026

Introduction

London Hydro Inc. (London Hydro) filed a cost of service application with the Ontario Energy Board (OEB) on August 28, 2026 under section 78 of the *Ontario Energy Board Act*, *1998*, seeking approval for changes to the rates that London Hydro charges for electricity distribution, beginning May 1, 2027 (the Application).

As part of its Application, London Hydro filed a letter with the OEB dated August 28, 2026[1] requesting confidential treatment for Exhibit 4, Appendix 4-3, pages 3, 4-6, 8-9, pursuant to the OEB's Practice Direction on Confidential Filings (Practice Direction).

London Hydro noted that the redacted information on page 3 and some of the redacted information on pages 4-6 contains strategic labour information that, if disclosed publicly, would reveal London Hydro's compensation, recruitment and retention strategies and could prejudice London Hydro's competitive position in labour negotiations. London Hydro referenced EB-2025-0252 and EB-2022-0149 where the OEB granted confidential treatment for commercially sensitive information that can prejudice a utility's competitive position in the labour market.

London Hydro also argued that the redactions on pages 4-6 contain personal information that may reveal actual compensation of identifiable individuals. London Hydro referenced previous proceedings[2] where the OEB held salary-range information as personal information where actual compensation could be inferred from publicly available information.

In addition, London Hydro stated that the redactions on pages 4-6 and 8-9 are presumptively confidential under the OEB's Practice Direction, as the redacted information contains proprietary datasets and information belonging to its consultant, Willis Towers Watsons. London Hydro submitted that public disclosure could undermine the confidentiality and economic value of its consultant's services

[1] EB-2026-0056, Letter to OEB, August 28, 2026
[2] EB-2024-0022, EB-2024-0096 and EB-2021-0009

OEB Staff Submission

OEB staff does not object to the redactions requested by London Hydro in its letter dated August 28, 2026, based on the rationale and explanations it has provided.

In addition, OEB staff observes that there are redactions in Exhibit 6, Appendix 6-3 (Corporate Tax Return Filing) that were not identified in the letter submitted by London Hydro on August 28, 2026. Based on OEB staff's review of the redactions, OEB staff submits that the redacted information does not appear to be relevant to proceeding and may also contain personal information. As such, OEB staff does not object to these redactions, but recommends that London Hydro include all requested redactions in its future request to the OEB.

~All of which is respectfully submitted~