



Registrar and Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

November 26, 2021

Dear Ms. Long,

RE: EB-2021-0041- Filing of Confidential Information

Attached to this letter are the unredacted answers to interrogatories and attachments to interrogatory responses for which London Hydro is requesting confidential treatment; accordingly, the attachments to this cover letter should not be filed on the public record in the absence of an order from the Board directing that they be filed publicly.

Except where London Hydro has asserted that a response or document contains personal information that should not be disclosed on the record in any form parties are able to obtain copies of the unredacted material upon completing and filing the OEB's Declaration and Undertaking with respect to Confidentiality.

1-Staff-4

1-CCC-6

Both questions sought information establishing the savings experienced by London Hydro as a result of conducting certain metering activities in-house rather than engaging a 3rd party to perform those activities on London Hydro's behalf. London Hydro believes that the detailed calculation should be treated as confidential information because the calculation is based on the quoted costs of a 3rd party vendor that, if disclosed, could impair that parties' ability in the marketplace with respect to providing those services to other parties. We have included both the redacted and unredacted versions of the answers.

2-Staff-32 b)

2-SEC-11 a) and d)

Attachment 1 – Dec 2019 Board of Directors Package

Attachment 2 – April 2021 Board of Directors Package

Attachment 3 - CIS Refresh - Planning and Business Requirements

Both questions relate to the details of London Hydro's planned CIS Refresh Project, a large capital project taking place over the 2022 to 2023 period. As the project is ongoing with a pending RFP process to be conducted in order to retain a 3rd party to execute the project on London Hydro's behalf, the details of London Hydro's forecasts relating the cost breakdown for the project as set out in 2-Staff-32 b) and the extensive details for the project as set out in the attachments to 2-SEC-11 is commercially sensitive information that, if made public, could materially impair London Hydro's ability to obtain competitive bids and negotiate effectively

with RFP respondents. We have provided both the redacted and unredacted of the answer to 2-Staff-32 b), as well as the attachments referred to in 2-SEC-11 a) and d).

3-Staff-51 a)

This question sought detailed load information concerning a specific, single customer expected to connect in 2022. It is London Hydro's understanding that load information relating to a specific customer is not to be placed on the public record. We have provided both the redacted and unredacted versions of the answer.

1-CCC-2

Attachment 1-IHSA Reports

In response to this question London Hydro provided a series of IHSA Reports; within the reports London Hydro has redacted the names of the specific employees to which the reports relate, as that information in the context of the reports constitutes personal information about each of the named individuals that London Hydro is not allowed to disclose. In addition, London Hydro would note, to the extent the IHSA Reports are marginally relevant to the application, London Hydro does not believe that the identities of the individuals to which each report refers is relevant at all. We have provided the redacted and unredacted versions of this attachment.

1-CCC-4

Attachment 3 - 2017 Business Opportunities in the Electric Vehicle Environment - London Hydro

This question sought a wide range of information relating to the impact of Electric Vehicles on London Hydro. While London Hydro has provided several reports on the public record that relate to the impact of Electric Vehicles on its distribution function in response to this interrogatory, Attachment 3 analyses non-distribution related business opportunities with respect to electric vehicles, an analysis which is commercially sensitive such that if it were put on the public record it could negatively impact London Hydro's ability (to the extent permitted) or an affiliate of London Hydro's ability to engage in unregulated electric vehicle related business opportunities. London Hydro notes that there are no costs related to Electric Vehicle related business opportunities included in the revenue requirement underpinning London Hydro requests for rates, such that although London Hydro has provided the material on a confidential basis the relevance of the document is minimal. London Hydro has provided a copy of the document in unredacted form.

1-SEC-1

Mearie/Korn Ferry Surveys:

- Attachment 1 2021 Board of Directors Compensation Report
- Attachment 2 2017 MEARIE Management Compensation Survey Report
- Attachment 3 2018 MEARIE Management Compensation Survey Report
- Attachment 4 2019 Board of Directors Compensation Report
- Attachment 5 2019 Management Compensation Survey Report
- Attachment 6 2020 Management Compensation Survey Report
- Attachment 7 2021 Management Compensation Survey Report

These documents are provided in response to the request for all benchmarking analysis in the possession of London Hydro. London Hydro is seeking confidential treatment of these documents on the following grounds:

- a) London Hydro is only in possession of the documents on the condition that London Hydro take steps to maintain confidentiality for the documents and is only permitted to provide the documents to a regulatory body such as the OEB if compelled to do so.
- b) The documents are the products of a 3rd party, products that have value for that 3rd party in the marketplace only insofar as the documents are not made available to the public for free through, for example, the filing of the documents on the public record in this proceeding. By way of example, Attachment 7 is the 2021 version of a Management Compensation Survey that London Hydro only received in October 2021; if that document is provided on the public record in this proceeding, then the producers of the Survey will likely lose most, if not all, of the opportunities they would normally have to leverage that document in the marketplace to interested customers. There would be no reason for potential customers to engage with the authors of the report if they can instead download the report on the OEB's website for free.
- c) London Hydro submits that placing documents prepared by 3rd parties for commercial purposes, as is this case in this instance, on the public record is likely to have to the effect of eliminating the incentive for those 3rd parties to produce those documents. To that end London Hydro submits that to the extent the OEB wants to encourage 3rd parties such as in this case to continue to expend the time and effort to produce such reports so that the OEB may have access to their contents in the regulatory process it should consider protecting the commercial interests of those 3rd parties in producing such documents by permitting them to remain confidential.

London Hydro has attached copies of all the referenced documents in 1-SEC-1 in unredacted form.

If there are any questions with respect to the foregoing, please contact the undersigned.

Respectfully submitted,



Martin Benum
Director of Regulatory Affairs
London Hydro
Tele: 519-661-5800 ext. 5750
Cell: 226-926-0959
email: benumm@londonhydro.com