

Nicole D.S. Merrick
Direct Line: 204 988-0377
Direct Fax: 204 953-7196
E-Mail: nmerrick@tmlawyers.com
Partner, Trade-mark Agent
Assistant: Melissa Ratcliffe
Direct Line: 204 988-0314
E-Mail: mratcliffe@tmlawyers.com

January 9, 2020

Public Utilities Board
330 Portage Avenue
Winnipeg, Manitoba
R3C 0C4

TRANSMITTED ELECTRONICALLY
Commercially Sensitive Information

Attention: Dr. Darren Christle/Ms. Rachel McMillan

Dear Dr. Christle and Ms. McMillan

Re: Commercially Sensitive Information - PUB/EM I-1 and PUB/EM I-10

We are writing in response to Public Utilities Board letter dated January 7, 2020, concerning the above noted information requests and Efficiency Manitoba's request that the information provided in connection with those responses be treated as commercially sensitive information under the Public Utilities Board Rule 13. We understand that the Public Utilities Board requires further information in consideration of this request.

Firstly, in connection with its request that the information set out in PUB/EM I-1 and PUB/EM I-10, Efficiency Manitoba included certain redaction codes in its request that the subject information was commercially sensitive information. Originally in regard to PUB/EMI-1, Efficiency Manitoba included redaction codes 1a and 1c. Efficiency Manitoba has now noted an error in the redaction codes used, namely that the codes relied on by Efficiency Manitoba concerning PUB/EM I-1 should have been 1c and 2b. Similarly, in regard to PUB/EM I-10, Efficiency Manitoba noted an error in its redaction codes used in connection with this request, and the redaction codes for this answer were originally listed as 1a and 2b , and these are also hereby corrected to be 1c and 2b.

These redaction codes used by Efficiency Manitoba correspond to the following:

Redaction Code

1. Manitoba Hydro Power Sales Contracts, Revenue & Price Forecast Information

c. Information or values that, if provided, would allow for the calculation of the information that Manitoba Hydro is seeking to protect.

2. Centra Gas Manitoba Inc. Sensitive Information for example:

b. Information or values that, if provided, would allow for the calculation of the information that Centra Gas Manitoba Inc. is seeking to protect.

As was noted in our December 23, 2019 letter to the Public Utilities Board of Manitoba, Efficiency Manitoba maintains its request that the information provided in PUB/EM I-1 and PUB/EM I-10 be treated as commercially sensitive information. In line with the Board's request for further information as to why the subject information should be treated as commercially sensitive information in this proceeding, Efficiency Manitoba requested further information from Manitoba Hydro and confirms that it is advised that while similar types of information may have been disclosed on the public record in previous proceedings, Manitoba Hydro is now aware that its export customers monitor PUB and regulatory filings to obtain information regarding Manitoba Hydro's operations, costs of supply, and supply and demand balance in an attempt to obtain maximum leverage in negotiations with Manitoba Hydro on export sales.

As technology advances, increasingly better search engines and data mining/analysis tools have increased the ease with which export customers can aggregate and analyze data from public sources. Knowledge of Manitoba Hydro's marginal values – even if an approximation – could significantly harm Manitoba Hydro's competitive position in future negotiated export contracts. As such, there is an increased need to keep such information confidential which is the reason the redacted information contained in response to PUB/EM I-1 and PUB/EM I-10 must not be disclosed.

We also submit information provided by Manitoba Hydro on blue paper containing calculation information that is marked as confidential to assist the Board with its consideration of this request that this information should be treated as commercially sensitive information in this proceeding. We consent to the disclosure of the blue paper enclosure to only the Public Utilities Board panel, Public Utilities Board staff, Board legal counsel and those advisors who have executed a non-disclosure agreement with Efficiency Manitoba only.

Should any further comment or clarification be required concerning any of the above, we would be pleased to provide same. If, for any reason, the Board does accept this submission Efficiency Manitoba would reserve the ability to withdraw the information pursuant to Rule 13(5) of the Rules of Practice and Procedure.

We look forward to receipt of your decision.

Yours truly,

TAYLOR McCAFFREY LLP

Per: *Transmitted electronically*

Nicole D.S. Merrick

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Encl.