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November 27, 2025

Board of Commissioners of Public Utilities  
Prince Charles Building  
120 Torbay Road, P.O. Box 21040  
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau  
Executive Director and Board Secretary

**Re: Newfoundland and Labrador Hydro – 2025 Capital Budget Supplemental Application – Application for the Purchase and Installation of Bay d’Espoir Unit 8 and Avalon Combustion Turbine – Confidential Information Inquiry – Hydro’s Reply**

Newfoundland and Labrador Hydro (“Hydro”) filed its application for capital expenditures for the purchase and installation of Bay d’Espoir Unit 8 and the Avalon Combustion Turbine (“2025 Build Application”) in March 2025. The filing noted that the evidence provided as part of that application contained commercially sensitive information. Hydro indicated that if the commercially sensitive information were made public, it would undermine Hydro’s ability to obtain goods and services at the lowest possible cost and therefore negatively impact Hydro’s customers. As such, Hydro provided to the Board of Commissioners of Public Utilities (“Board”) a version of the application in which the commercially sensitive information was redacted in full and requested that that version be utilized for posting to the Board’s website. A complete unredacted version was also provided to the Board for its review, and to the parties upon completion of non-disclosure agreements (“NDAs”).

On April 11, 2025, the Board advised Hydro that it had concerns with the extent of information categorized as confidential in Hydro’s application and requested that Hydro review the filing and revise its claim for confidentiality to limit the claim where possible. The Board asked that Hydro specifically identify each piece of information which is filed on a confidential basis, the basis for the claim and why public disclosure would be detrimental. On May 9, 2025, Hydro filed an update to the application in which it unredacted certain information in response to the Board’s concerns. Hydro also provided a summary of how utility regulators in Canada approach requests for confidentiality of certain filings, along with the justification for the specific groups/types of information that have been identified as commercially sensitive and requiring confidentiality.

In correspondence to Hydro on November 7, 2025, the Board noted its previous acknowledgement that some information in the application may be of a confidential nature, but expressed continued reservations about the extent of the redactions. The Board requested that Hydro review its filing once again, and provide a response to the Board advising whether any additional information can now be unredacted given the passage of time since submission of the application; whether any of the redacted information in the application has been publicly disclosed in this or other proceedings and, if so, to unredact that information in the application; and review the table provided with the Board’s correspondence to determine if any of the redactions in the sections identified can be released in full or

in part. The Board noted that it has particular concerns with these redactions. If redactions remain after review, Hydro was requested to provide further justification to support the confidentiality claim.

### **Hydro's Reply**

Hydro is aware of the importance of being open, transparent, and accessible in regulatory proceedings, particularly ones that would have a significant impact on the electricity customers in the province. However, Hydro is also acutely aware of the impacts that the release of commercially sensitive information to the public, including contractors and potential contractors involved in these projects, could have. The release of commercially sensitive information could provide competitive advantages to certain proponents over others, or weaken Hydro's negotiating position with the proponents to its procurement processes. Certain information would also provide contractors with information on whether there is available budget or contingency funds within a project that may incent for change orders or claims that could directly impact Hydro's ability to control costs through the project. Any of these avoidable issues could result in unnecessary higher costs to customers. Therefore, Hydro strives to balance the public interest for transparency against the risks to Hydro's competitive and negotiating position that would impair Hydro's ability to control project costs. The Board and intervenors, who represent Hydro's customers, have the ability to review and evaluate all confidential documentation through the regulatory proceeding.

Hydro has reviewed the application and confirms that, to the best of its knowledge, the redacted information has not been publicly disclosed in this or other proceedings. Hydro has reviewed the table provided by the Board and has amended it to indicate the information in those sections, specify whether it can now be unredacted, and the reasoning why, including that information that can be released due to the passage of time. The table also specifies what information will remain redacted for commercial sensitivity. In those cases, Hydro has attempted to provide further specific explanations regarding why the information should be maintained as confidential. The table is attached hereto. Hydro notes that, unlike typical capital applications under review before the Board, project activities are actively underway through the approved Early Execution scope. Through its monthly reports to the Board, Hydro is providing up-to-date cost and schedule information, which may or may not differ from the information provided within the 2025 Build Application.

Hydro notes that the risks associated with the disclosure of commercially sensitive information can and do exist through project execution until such time as contracts are completed and closed; this can extend beyond the commissioning of the assets, and as such, in many cases, the information should remain confidential throughout the course of the project.

### **Conclusion**

As noted in Hydro's previous correspondence to the Board, Hydro's concern is that access to specific information about a utility's requirements can negatively influence contract pricing, including initial bid pricing, change requests received during project execution, and project-related commercial claims, which could ultimately drive an increase in costs for the utility and its customers. Hydro has provided the Board, as well as the intervenors who have signed NDAs, with an unredacted application that is thorough, detailed, and fully supported with the evidence necessary to justify the projects proposed within it. As a result, the application contains a substantial amount of commercially sensitive information. Hydro has carefully reviewed the application and redacted only that information that has the potential to influence future bidding strategies or negotiations, or contract management with

suppliers. The release of that information could result in higher prices or restrictive contract terms, both of which lead to avoidable and unnecessary costs for customers.

Hydro requests that the information it has continued to redact in the application documents be accepted as commercially sensitive and maintained as confidential in the Board's public filings.

Should you have any questions, please contact the undersigned.

Yours truly,

**NEWFOUNDLAND AND LABRADOR HYDRO**



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Shirley A. Walsh  
Senior Legal Counsel, Regulatory  
SAW/kd

ecc:

**Board of Commissioners of Public Utilities**

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**Island Industrial Customer Group**

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**Newfoundland Power Inc.**

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Regulatory Email

Schedule Reference	Section	Unredact, Partial Unredaction or Maintain Redact in Full	Unredacted Information	Rationale for Continued Redaction
Schedule 1: Application Overview, Appendix D	Page D-1, Table 1: Incremental Revenue Requirement	Redact in Full	N/A	Release of information related to planned project budget could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of the planned project budget revenue requirement could, along with other information publicly available, allow for the inference of other estimate components. Disclosure of the planned project budget, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 4: BDE Unit 8 Project Evidence, Appendix A	Page A-1, Table 1: Project Budget Breakdown	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of the planned project estimate (or percentages thereof) could, along with other information publicly available, allow for the inference of other estimate components. Disclosure of the work scope estimates, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 4, Attachment 1: BDE8 Basis of Estimate	Section 1.0 - Executive Summary, Pages 6-7	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Disclosure of the work scope estimates; management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 4, Attachment 2: BDE8 Basis of Schedule	Section 5.1.2, Page 10, Figure 2: "BDE8 Sched at LVL1 & LVL2 WBS Summary"	Partial Unredaction	Schedule information publicly disclosed to date in Early Execution reports within Figure 2	Release of information related to detailed project schedules and/or work scopes could result in undue material financial loss to Hydro. In particular disclosure of assumed project schedules (beginning/end dates), points of contractor interface, and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 4, Attachment 2: BDE8 Basis of Schedule	Section 6.1.1, Page 13, Figure 3: "BDE8 Schedule Milestone Listing"	Partial Unredaction	Schedule information publicly disclosed to date in Early Execution reports within Figure 3	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular, the disclosure of assumed project schedules (beginning/end dates), points of contractor interface and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 4, Attachment 2: BDE8 Basis of Schedule	Section 7.0, Page 21, Figure 4: "BDE8 Project Critical Path"	Partial Unredaction	Schedule information publicly disclosed to date in Early Execution reports within Figure 4	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular, the disclosure of assumed project schedules (beginning/end dates), points of contractor interface and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 4, Attachment 2: BDE8 Basis of Schedule	Section 8.0, Page 22	Redact in Full	N/A	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular, the disclosure of assumed project schedules (beginning/end dates), points of contractor interface and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.

Schedule Reference	Section	Unredact, Partial Unredaction or Maintain Redact in Full	Unredacted Information	Rationale for Continued Redaction
Schedule 4, Attachment 2: BDE8 Basis of Schedule	BDE8 PCS - WBS Structure, Pages 35–36	Partial Unredaction	Work Breakdown Structure Name and Code	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular, the disclosure of the level of detail within work scope (and inferred budget), could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5: ACT Evidence, Appendix B	Page B-1, Table 1: "Project Budget Breakdown"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could, along with other information publicly available, allow for the inference of other estimate components. Disclosure of work scope estimates, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5: ACT Evidence, Appendix C	Page C-1, "ACT Project - Major Projects - Project Control Schedule"	Partial Unredaction	Schedule information publicly disclosed to date in Early Execution reports	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular, disclosure of assumed project schedules (beginning/end dates), points of contractor interface and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT Basis of Estimate	Section 1.0, Pages 6–7	Partial Unredaction	P mean value of MCS output ("P55")	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could, along with other information publicly available, allow for the inference of other estimate components. Disclosure of work scope estimates, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT Basis of Estimate	Section 9.0, Table 5: "Planned Spend Profile," Page 23	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could, along with other information publicly available, allow for the inference of other estimate components. In particular, disclosure of planned expenditures by year allows greater inference of budgets for work scopes as Requests for Proposals are released, which could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT Basis of Estimate	Section 11.0 "Allowances," Page 25	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of work scope estimates, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.

Schedule Reference	Section	Unredact, Partial Unredaction or Maintain Redact in Full	Unredacted Information	Rationale for Continued Redaction
Schedule 5, Attachment 1: ACT - Basis of Estimate	Section 12.0 "Contingency," Page 25	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of work scope estimates, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Basis of Estimate	Section 13.0 "Management Reserve," Page 25	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of work scope estimates, management reserve, or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Basis of Estimate	Section 14.0 "Estimate Classification," Page 25	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of confidence levels associated with project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - FEED Study - Hatch	Page 42, Engineers and Stamps	Redact in Full	N/A	Information requested to be kept confidential by vendor.
Schedule 5, Attachment 1: ACT - FEED Study - Hatch	Section 1.5 "Estimate Parameters," Page 48	Redact in Full	N/A	Release of information related to detailed project estimates which could result in undue material financial loss to Hydro; and cause significant harm or prejudice to a Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of confidence levels associated with project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - FEED Study - Hatch	Section 1.7.3, Page 51, Table 1-4: "Maturity Matrix Table"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss or gain to Hydro; and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of assumed risks, associated likelihood, and/or associated reserve included within project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - FEED Study - Hatch	Section 2 "Estimate Classification," Pages 53–55; including: Table 2-2: "CAPEX Reconciliation Accuracy Range," Table 2-3: "CAPEX Reconciliation - Direct Cost," and Table 2-4: "CAPEX Reconciliation - Summary"	Redact in Full	N/A	Release of information related to detailed project estimates which could result in undue material financial loss to Hydro; and cause significant harm or prejudice to a Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of confidence levels, assumed risks, associated likelihood, and/or associated reserve included within project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.

Schedule Reference	Section	Unredact, Partial Unredaction or Maintain Redact in Full	Unredacted Information	Rationale for Continued Redaction
Schedule 5, Attachment 1: ACT - FEED Study - Hatch	Section 7 "Escalation," Page 83	Unredacted	Section 7.0	This information has been unredacted.
Schedule 5, Attachment 1: ACT - FEED Study - Hatch	Section 8 "Contingency," Page 83, Table 8-1: "Contingency"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of work scope estimates, management reserve or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Page 88, Engineers and Stamps	Redact in Full	N/A	Information requested to be kept confidential by vendor.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 2 "Executive Summary," Pages 92–93, including Table 2-1: "Schedule Risk Analysis Results," and Table 2-2: "Capital Risk Analysis Results"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of work scope estimates, management reserve or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 3 "Introduction," Page 93	Redact in Full	N/A	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular disclosure of assumed project schedules (beginning/end dates), points of contractor interface and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 5 "QRA Workshop Participants," Pages 95–96, Table 5-1: "Parametric QRA Workshop Participants"	Redact in Full	N/A	Information requested to be kept confidential by vendor.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 6 "Capex & Schedule Risk Analysis," Sub-Section 6.3 "Project Schedule & Cost Risk Assumptions," and "Systemic Risk Factors," Page 96	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of assumed risks, associated likelihood, and/or associated reserve included within project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 6 "Capex & Schedule Risk Analysis," Sub-Section 6.3 "Project Specific Risk Factors," Page 97, Table 6-1: "Project Specific Risk Events"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of assumed risks, associated likelihood, and/or associated reserve included within project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.

Schedule Reference	Section	Unredact, Partial Unredaction or Maintain Redact in Full	Unredacted Information	Rationale for Continued Redaction
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 6 "Capex & Schedule Risk Analysis," Sub-Section 6.4 "Schedule Risk Analysis Results," Pages 97-99, Figure 6-1: "Schedule Risk Profile" and following text, and Table 6-2: "Summary Schedule Risk Profile" and Table 6-3: "Levels of Confidence"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of confidence levels, assumed risks, associated likelihood, and/or associated reserve included within project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 6 "Capex & Schedule Risk Analysis," Sub-Section 6.5 "Cost Risk Analysis Results," Pages 99-101, Table 6-4: "Cost Simulation Output" and Table 6-5: "Levels of Confidence", and Figure 6-2: "Project Capital Risk Profile"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of confidence levels, assumed risks, associated likelihood, and/or associated reserve included within project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 6 "Capex & Schedule Risk Analysis," Sub-Section 6.5 "Cost Risk Analysis Results," Sub-Section 6.5.1 "Estimate Accuracy," Page 101, Table 6-6: "Estimate Accuracy"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of confidence levels associated with project estimates could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Section 6 "Capex & Schedule Risk Analysis," Sub-Section 6.6 "Risk Drivers Analysis," Pages 102-103, including Figure 6-3: "Systemic Risk Influence Diagram"	Redact in Full	N/A	Release of information related to detailed project estimates could result in undue material financial loss to Hydro, and cause significant harm or prejudice to Hydro's competitive or negotiating position. Release of all or a portion of planned project estimate (or percentages thereof) could allow inference of other estimate components. Disclosure of work scope estimates, management reserve or contingency amounts could lead to increased costs to Hydro and therefore to customers as a result of influencing bidding and/or contract negotiation processes, legal proceedings related to claims, etc.
Schedule 5, Attachment 1: ACT - Para QRA Report - Hatch	Pages 105-113, Appendix A - Systemic Risk Modelling	Redact in Full	N/A	Information requested to be kept confidential by vendor.
Schedule 5, Attachment 2: ACT - Basis of Schedule	Section 5.1.2 "Schedule Structure," Page 10, Figure 2: "ACT Schedule at LVL1 and LVL2 WBS Summary"	Partial Unredaction	Schedule information publicly disclosed to date in Early Execution reports within Figure 2	Release of information related to detailed project schedules and/or work scopes could result in undue material financial loss to Hydro. In particular, disclosure of assumed project schedules (beginning/end dates), points of contractor interface and critical path milestones could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.
Schedule 5, Attachment 2: ACT - Basis of Schedule	Pages 36-38 - Project Control Schedules - WBS Structure	Partial Unredaction	Work Breakdown Structure Name and Code	Release of information related to detailed project schedules and/or detailed work scope planning could result in undue material financial loss to Hydro. In particular disclosure of level of detail within work scope (and inferred budget), could lead to increased costs to Hydro and therefore to customers as a result of increased exposure within legal proceedings related to claims, etc.