

CANADA

RÉGIE DE L'ÉNERGIE

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

N°: R-4061-2018

HYDRO-QUÉBEC, legal person in the public interest constituted by the Hydro-Québec Act, CQLR, c. H-5, having its head office at 75 René-Lévesque Blvd West, Montréal, Province of Québec, H2Z 1A4

Applicant

AFFIDAVIT OF MICHAEL SHADBOLT
MONT-LOUIS WIND L.P. AND SAINT-ULRIC SAINT-LÉANDRE WIND L.P.
(Section 30 of *Act respecting the Régie de l'énergie*)

I, the undersigned Michael Shadbolt, residing in Toronto, province of Ontario, do solemnly affirm, in my capacity as an officer for the respective entities noted below and not in my personal capacity, as follows:

1. I am Michael Shadbolt, (i) the Assistant Secretary of NPI Wind Power GP II Inc., the managing general partner of Mont-Louis Wind L.P. ("**Mont Louis**"), which has a place of business at 30, St. Clair Ave., 17th Floor, Toronto, Ontario M4V 3A1, and (ii) the Secretary, VP & General of NPI Wind Power GP I Inc., the managing general partner of Saint-Ulric Saint-Léandre Wind L.P. ("**SUSL**"), which has a place of business at 30, St. Clair Ave., 17th Floor, Toronto, Ontario M4V 3A1. Mont Louis and SUSL are collectively referred to herein as the "**Wind Farms**".
2. In such capacities, I am familiar with the administration of the Wind Farms and I am duly authorized to subscribe to this affidavit in support of the request for confidentiality hereinafter.
3. As part of decision D-2018-183 regarding *Demande d'Hydro-Québec dans ses activités de distribution d'électricité relative à l'approbation des caractéristiques du service d'intégration éolienne et des critères d'analyse des soumissions en vue de l'acquisition d'un service d'intégration*, the Quebec Energy Board ordered Hydro-Québec Distribution ("**HQD**") to submit monthly historical data on the contribution of operating wind farms in the Province of Quebec (the "**Data**"), including each Wind Farm's Data.
4. Each of Mont Louis and SUSL request that their respective Data be filed confidentially, not be made publicly available, only be used for the benefit of the Quebec Energy Board, and that the confidentiality of their respective Data be preserved.
5. Each of Mont Louis and SUSL's Data consists of financial, commercial and technical information that has been consistently treated as confidential information by each entity, and has never been disclosed publicly nor made available publicly.

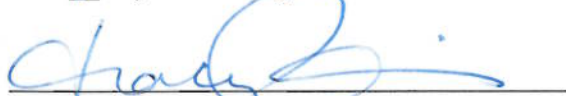
6. Each of Mont Louis and SUSL submit that the disclosure, publication or dissemination of their respective Data could be detrimental to their interests and the interest of their affiliates by providing competitors with sensitive information relating to the wind speed, frost-related losses and performance of the Wind Farms. Each of Mont Louis and SUSL submit that their respective Data provides the average speed of each site and thus makes it possible to evaluate the operational efficiency of each site and to evaluate its performance. In a competitive industry such as the wind industry, any variance in operational efficiency can make a difference. The disclosure, publication or dissemination of the Wind Farms' Data would provide considerable benefit to competitors of the Wind Farms and adversely affect the competitiveness of the Wind Farms or potential future developments, or would harm their competitiveness in future bids and would allow competitors to have knowledge of pricing strategy adopted by the Wind Farms.
7. Each of Mont Louis and SUSL request that the confidentiality of their respective Data be acknowledged and that such Data be treated confidentially by the Quebec Energy Board.
8. I sign this affidavit in support of the application by HQD to obtain a confidentiality order prohibiting the disclosure, publication and dissemination of the Data of the Wind Farms other than to the benefit of the Quebec Energy Board.

AND I HAVE SIGNED



Michael Shadbolt

Solemnly affirmed before me, in Toronto,
This 8th day of February 2019



NOTARY PUBLIC

Tracy Denise Chin Robillard

