

CANADA

REGIE DE L'ENERGIE

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

N°: R-4061-2018

HYDRO-QUEBEC, legal person in the public interest constituted by the Hydro-Quebec Act, CQLR, c. H-5, having its head office at 75 Rene-Levesque Blvd West, Montreal, Province of Quebec, H2Z 1A4

Applicant

AFFIDAVIT OF DAVID BRONICHESKI
Corporation Fleur de Lis Eoliennes Saint-Damase Commandite
(Section 30 of *Act respecting the Regie de l'Energie*)

I, the undersigned David Bronicheski, residing in Toronto, province of Ontario, do solemnly affirm, in my capacity as an director for the respective entity noted below and not in my personal capacity, as follows:

1. I, David Bronicheski, am director of **Corporation Fleur de Lis Eoliennes Saint-Damase Commandite**. ("**St Damase**"), which has a place of business at 64, Rang 7 Ouest, St Damase, QC, G0J2J0.
2. In such capacity, I am familiar with the administration of St Damase wind farm 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-Quebec dans ses activites de distribution d'electricite relative a l'approbation des caracteristiques du service d'integration eolienne et des criteres d'analyse des soumissions en vue de l'acquisition d'un service d'integration*, the Quebec Energy Board ordered Hydro-Quebec Distribution ("**HQD**") to submit monthly historical data on the contribution of operating wind farms in the Province of Quebec (the "**Data**").
4. St Damase requests that its 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 its Data be preserved.
5. St Damase's Data consists of financial, commercial and technical information that has been consistently treated as confidential information by St Damase, and has never been disclosed publicly nor made available publicly.
6. St Damase submits that the disclosure, publication or dissemination of its Data could be

detrimental to its interests and the interest of its affiliates by providing competitors with sensitive information relating to the wind speed, frost-related losses and performance of the St Damase wind farm. St Damase submits that its Data provides the average speed of site and thus makes it possible to evaluate the operational efficiency of the 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 St Damase wind farm's Data would provide considerable benefit to competitors of the wind site and adversely affect the competitiveness of the wind site or potential future developments, or would harm its competitiveness in future bids and would allow competitors to have knowledge of pricing strategy adopted by the site.

7. St Damase requests that the confidentiality of its 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 St Damase Wind Farm other than to the benefit of the Quebec Energy Board.

AND I HAVE SIGNED



Name:

Director
Corporation Fleur de Lis Eoliennes Saint-Damase Commandite

Solemnly affirmed before me, in Oakville,
This 13th day of March 2019



Notary Public

