

CANADA

RÉGIE DE L'ÉNERGIE

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

Nº: 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 PATRICK LEITCH
PARC ÉOLIEN SAINT-PHILÉMON L.P./ PARC ÉOLIEN SAINT-PHILÉMON S.E.C.
(Section 30 of *Act respecting the Régie de l'énergie*)

I, the undersigned Patrick Leitch, residing in Toronto, province of Ontario, do solemnly affirm, in my capacity as an officer as noted below, and not in my personal capacity, as follows:

1. I am Patrick Leitch, the VP Operations of Parc Éolien Saint-Philémon G.P. Inc./Parc Éolien Saint-Philémon Commandité inc., the managing general partner of Parc Éolien Saint-Philémon L.P./ Parc Éolien Saint-Philémon S.E.C. (the "**Wind Farm**"), which has a place of business at 820 rue Therrien, Saint-Philémon (Québec) G0R 4A0.
2. In such capacities, I am familiar with the administration of the 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-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 the Wind Farm's Data.
4. The Wind Farm requests that its Data be filed confidentially, not be publicly available, only be used for the benefit of the Quebec Energy Board, and that the confidentiality of its Data be preserved.
5. The Wind Farm's Data consists of financial, commercial and technical information that has been consistently treated as confidential information by the Wind Farm, and has never been disclosed publicly nor made available publicly.
6. The Wind Farm submits that the disclosure, publication or dissemination of its Data could be detrimental to their interests and those of their affiliates by providing competitors with sensitive information relating to the wind speed, frost-related losses and performance of the Wind Farm. The Wind Farm submits that the Data provides the average speed and thus makes it possible to

evaluate the operational efficiency and the performance of the site. 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 Farm's Data would provide considerable benefit to competitors of the Wind Farm and adversely affect the competitiveness of the Wind Farm 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 Wind Farm.

7. The Wind Farm 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 Wind Farm other than to the benefit of the Quebec Energy Board.

AND I HAVE SIGNED



Patrick Leitch

Solemnly affirmed before me, in Toronto,
This 22nd day of March 2019



NOTARY PUBLIC

Aileen Tran Gien