

CANADA

REGIE DE L'ENERGIE

PROVINCE OF QUEBEC  
DISTRICT OF  
MONTREAL

N<sup>o</sup>: R-4061-2018

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

Applicant

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AFFIDAVIT OF DYANN BLAINE  
MONT SAINTE-MARGUERITE WIND FARM L.P., by its managing  
and authorized agent, Pattern Development MSM Management ULC

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I, the undersigned Dyann Blaine, residing in San Francisco, California, do solemnly affirm, in my capacity as a Vice President for the respective entity noted below and not in my personal capacity, as follows:

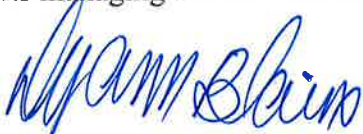
1. I am Dyann Blaine, Vice President of Mont Sainte Marguerite Wind Farm LP, which has a place has its principal place of business at 1088 Sansome St, San Francisco, California, 94111, USA.
2. In such capacity, I am familiar with the administration of MONT SAINTE-MARGUERITE WIND FARM L.P. and I am duly authorized to subscribe to this affidavit in support of the request for confidentiality hereinafter.
3. As part of decision D-2019-041, whereby in particular, it reversed its decision of the maintenance of confidential treatment of the monthly data for Mont Sainte-Marguerite Wind Farm LP, located on the territory of the regional municipalities of the counties ("MRC") of Lotbinière, Robert-Cliche and Appalaches, within the municipal boundaries of Saint-Sylvestre, Saint-Séverin and Sacré-Coeur-de-Jésus where 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. Mont Sainte Marguerite Wind Farm LP 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. Mont Sainte Marguerite Wind Farm LP Data consists of financial, commercial and technical information that has been consistently treated as confidential information by Mont Sainte Marguerite Wind Farm LP and has never been disclosed publicly nor made available publicly.
6. Mont Sainte Marguerite Wind Farm LP 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 Mont Sainte Marguerite Wind Farm. Mont Sainte Marguerite Wind Farm LP 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 Mont Sainte Marguerite 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. Mont Sainte Marguerite 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 Mont Sainte Marguerite Wind Farm other than to the benefit of the Quebec Energy Board.

Vice President of

MONT SAINTE-MARGUERITE WIND FARM L.P.

by its managing and authorized agent, Pattern Development MSM Management ULC



Solemnly affirmed before me, in San Francisco,

This 3<sup>rd</sup> day of May 2019

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Notary Public

**ACKNOWLEDGMENT**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of San Francisco )

On May 3, 2019 before me, Stacey Theodorou  
(insert name and title of the officer)

personally appeared Dyann Blaine,  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Stacey Theodorou (Seal)



