

CANADA

RÉGIE DE L'ÉNERGIE

PROVINCE DE QUÉBEC
DISTRICT DE MONTRÉAL

NO : R-4167-2021

HYDRO-QUÉBEC, personne morale de droit public légalement constituée en vertu de la *Loi sur Hydro-Québec* (RLRQ c. H-5) ayant son siège social au 75, René-Lévesque Ouest, dans la cité et district de Montréal, province de Québec, H2Z 1A4,

Demanderesse

**DEMANDE DU TRANSPORTEUR DE MODIFICATION DES TARIFS ET
CONDITIONS DES SERVICES DE TRANSPORT POUR LES ANNÉES
2021 et 2022**

**Sworn statement in support of the request for confidential treatment of
documents produced by The Brattle Group**

I, **Agustin J. Ros**, Principal at the Brattle Group, One Beacon Street Suite 2600, Boston, MA, USA, being duly sworn, do depose and say:

1. Brattle produced in this file its report of PMF studies and comparative statistics entitled *Total Factor Productivity and the X-factor for Hydro-Quebec TransÉnergie* (HQT-5, Document 2).
2. As requested by the Régie, Brattle also produces various working or supporting documents for its report.
3. Among these documents are some which should be treated as confidential.
4. Brattle's working papers include some files that we used in our productivity and benchmarking studies in this proceeding. We hereby request that the Régie declare some of these files to be confidential and accessible to other parties in this proceeding only upon signing a confidentiality agreement.
5. Brattle specifically requests confidential treatment for: Brattle TFP Model. The reasons that we request confidentiality for these data are as follows.
6. Brattle's TFP model contains data from Whitman, Requardt and Associates. Specifically, in our TFP model we use the Handy-Whitman Index which provides

cost trends for different types of utility construction. Based upon our licensing agreement with Whitman, Requardt and Associates, we are not permitted to share the data with the public.

7. This is information and data that Brattle treats confidentially as per our licensing agreement with Whitman, Requardt and Associates.
8. Brattle hereby requests that the Regie declare these documents to be confidential and accessible to other parties in this proceeding only upon signing a confidentiality agreement: *B-0013, HQT-5, Document 2.1- Étude de productivité multifactorielle de The Brattle Group – Document de soutien 1 (sous pli confidentiel)*.
9. Brattle requires that the confidentiality of documents, data and information be maintained without time limit in accordance with our contractual obligations towards Whitman, Requardt and Associates.
10. Upon the conclusion of the proceeding we request that other parties destroy these data.
11. All the facts recited in the request for confidential treatment of documents produced by Brattle are true to my personal knowledge.

And I signed in Boston, USA, on October 12, 2021

(s) Agustin J. Ros

Agustin J. Ros

Solemnly declared before me by video conference
in Laval, Quebec, on October 12, 2021

(s) Lucie Gauthier

Lucie Gauthier, advocate,
Member of the Québec Bar