



30 November 2023

Ausgrid's 2024-29 Revised Proposal

Attachment 2.2: Confidentiality claims

Empowering communities for a resilient,
affordable and net-zero future.



Purpose

The *National Electricity Rules (NER)* and *National Electricity Law*¹ require Ausgrid to identify those parts of our Regulatory Proposal that contain confidential information and to prepare confidentiality claims in accordance with the AER's Confidentiality Guideline (**Confidentiality Guideline**).²

NER clause 6.8.2(c)(6) provides that a regulatory proposal must include an identification of any parts of the regulatory proposal the Distribution Network Service Provider claims to be confidential and wants suppressed from publication on that ground in accordance with the Confidentiality Guideline. The Confidentiality Guideline requires network service providers to submit a confidentiality template together with public and confidential versions of documents and a 'proportion of confidential material notice' setting out the proportion of material claimed to be confidential.⁴

The table at **Appendix A** sets out our confidentiality claims in our Revised Proposal. All confidentiality claims have been made in accordance with the requirements of the Confidentiality Guideline.

The completed 'proportion of confidential material notice' is provided at **Appendix B**.

¹ *National Electricity Law*, s 280A.

² Australian Energy Regulator, *Confidentiality Guideline*, August 2017.

Appendix A: Confidentiality claims template

The following table sets out our confidentiality claims in documents that form part of our Revised Proposal, in accordance with the AER's Confidentiality Guidelines.

	Title, page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential	Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers)	Pages containing confidential information / Total pages
1.	Attachment 5.1 – Revised capital expenditure Pages 40-42 and 44	Customer details, details of potential connection enquiries by identified potential customers and the class of customer they belong to	Capex	Personal information Strategic information	Information about identified potential customers belonging to a particular customer class and details of their respective potential connection enquiries.	Information directly identifies customers, potential customers and their proposed activities. The release of this information may have an adverse impact on Ausgrid's tariff negotiations with customers, and also on negotiations to acquire land for the new sub-transmission station (STS) and easements for associated 132kV connections.	Provision of this information would not be of any public benefit, and will breach privacy obligations. There is only a detriment as outlined in the previous two columns.	4 / 48
2.	Attachment 5.2 – Capex model – FY23 Worksheets: <ul style="list-style-type: none">• "Input Projects" (C26, C53, C67, C72)• "Calc Project Costs" (C26, C53, C67, C72)	Identification of customers	Capex	Personal information	Individual customer names identified in relation to project/program inputs.	Information directly identifies customers and their proposed activities.	Disclosure would result in breach of privacy obligations. Provision of this information would not be of any public benefit.	2 / 16
3.	Attachment 5.2.1 – Capex model - FY24 Worksheets: <ul style="list-style-type: none">• "Input Projects" (C22, C31, C41)• "Calc Project Costs" (C22, C31, C41)	Identification of customers	Capex	Personal information	Individual customer names identified in relation to project/program inputs.	Information directly identifies customers and their proposed activities.	Disclosure would result in breach of privacy obligations. Provision of this information would not be of any public benefit.	2 / 17
4.	Attachment 5.3 – Capex model - FY25-29 Worksheets: <ul style="list-style-type: none">• "Input Projects" (C32-C33, C40, C45, C49)• "Calc Project Costs" (C32-	Identification of customers	Capex	Personal information	Individual customer names identified in relation to project/program inputs.	Information directly identifies customers and their proposed activities.	Disclosure would result in breach of privacy obligations. Provision of this information would not be of any public benefit.	2 / 16

	C33, C40, C45, C49)							
5.	<p>Attachment 5.5.1 – Climate Resilience Model 1 - HV End to End</p> <p>Worksheets:</p> <ul style="list-style-type: none"> • “REC_CCT_Study” (B2:AQ1932) • “RES_REC_CCT_All_Study” (B2:AO1932) • “REC_UG_Study” (B2:AD1932) • “REC_UG_1500m_Study” (B2:AD1932) • “REC_UG_1000m_Study” (B2:AD1932) • “REC_UG_500m_Study” (B2:AD1932) • “I-FdrLoad” (B4:B1185) • “I-FdrVeg” (B3:C1933) • “I-Poles” (A2:J521990) • “C-FeederPoFMap” (A4:E1830) • “C-FeederPoF” (B5:B1186) • “C-FeederOut” (B5:B1186) • “C-FeederOtherOut” (B5:B1186) • “E-EcoInput” (A6:A1187, EQ 6:EQ1187, KE6:KE1187, PS6:PS1187, VG6:VG1187, AAU6:AAU1187, AGI6:AGI1187, ALW6:ALW1187, ARK6:ARK1187, AWY6:AWY1187, BCM6:BCM1187, BIA6:BIA1187, BNO6:BNO1187, BTC6:BTC1187) • “E-EcoInput veg” (A6:A1187, EQ 6:EQ1187, KE6:KE1187, PS6:PS1187, VG6:VG1187, AAU6:AAU1187, AGI6:AGI1187, ALW6:ALW1187, ARK6:ARK1187, AWY6:AWY1187, BCM6:BCM1187, BIA6:BIA1187, BNO6:BNO1187, BTC6:BTC1187) • “E-EcoInputOther” (A6:A1187, EQ 6:EQ1187, KE6:KE1187, PS6:PS1187, VG6:VG1187, AAU6:AAU1187, AGI6:AGI1187, ALW6:ALW1187, 	<p>Feeder vulnerability data and forecasts</p> <p>Third party intellectual property</p>	Capex	<p>Information affecting the security of the network</p> <p>Other</p>	<p>Model includes specific electrical distribution feeder vulnerability forecasts that will present risks to the security of the network if made public.</p> <p>Modelling data inputs include intellectual property not owned by Ausgrid which Ausgrid does not have permission to make public.</p>	<p>Provision of this information has the potential to compromise security.</p> <p>Disclosure without permission from the third party will allow other businesses (including potential competitors of the third party) to take advantage of its proprietary information, which would negatively impact the reputation of Ausgrid’s business</p>	<p>Disclosure would increase risk of Ausgrid being a target of a cyber security attack.</p> <p>Disclosure would negatively impact the reputation of the business.</p>	24 / 42

	<p>ARK6:ARK1187, AWY6:AWY1187, BCM6:BCM1187, BIA6:BIA1187, BNO6:BNO1187, BTC6:BTC1187)</p> <ul style="list-style-type: none"> • “E-EcoInputAll (B6:B1936) • “E-Economic Model” (B6:H1936) • “I-WM_all” (F5:DA2794) • “I-ECLD_All” (E6:CZ938) • “I-WM_ToModel” (B5:CW314) • “I-ECLD_ToModel” (B5:CW314) • “C-PoleFailProb” (CU10:GG471) • “C-VegFailProb” (CU10:GG471) 							
6.	<p>Attachment 5.6 – Wallumatta STS business case</p> <p>Pages 4-8, 12-14</p>	<p>Customer details, details of potential connection enquiries by identified potential customers and the class of customer they belong to</p> <p>Detailed information about the location of the proposed new STS</p>	Capex	<p>Personal information</p> <p>Strategic information</p>	<p>Information about identified potential customers belonging to a particular customer class and details of their respective potential connection enquiries.</p> <p>Information about the location of the proposed new substation.</p>	<p>Information directly identifies customers, potential customers and their proposed activities.</p> <p>The release of this information may have an adverse impact on Ausgrid’s tariff negotiations with customers, and also on negotiations to acquire land for the new STS and easements for associated 132kV connections.</p>	<p>Provision of this information would not be of any public benefit, and will breach privacy obligations. There is only a detriment as outlined in the previous two columns.</p>	8 / 14
7.	<p>Attachment 5.7.8 – Ausgrid Rooftop Solar CBA model</p> <p>Worksheets:</p> <ul style="list-style-type: none"> • “Step change summary” (A16:EQ230659) • “2024” (A5:AJ57665) • “2029” (A2:AL57662) • “2034” (A2:AL57662) • “2039” (A2:AL57662) 	Feeder vulnerability data and forecasts	Capex	Information affecting the security of the network	Model includes specific electrical distribution feeder vulnerability data and forecasts that will present risks to the security of the network if made public.	Provision of this information has the potential to compromise security.	Disclosure would increase risk of Ausgrid being a target of attacks on critical network infrastructure.	5 / 11
8.	<p>Attachment 5.7.9 – EV CBA model</p> <p>Worksheets:</p> <ul style="list-style-type: none"> • “Network Analysis” (A6:BG57827) • “Investment Options” (H8:57829) • “Option 2 Investments” (I9:I32544) 	Feeder vulnerability data and forecasts	Capex	Information affecting the security of the network	Model includes specific electrical distribution feeder vulnerability data and forecasts that will present risks to the security of the network if made public.	Provision of this information has the potential to compromise security.	Disclosure would increase risk of Ausgrid being a target of attacks on critical network infrastructure.	9 / 15

	<ul style="list-style-type: none"> • “Everergi allocation” (A11:J62401, P12:S36898, W12:Z47313) • “Fleet” (A2:X36888) • “Residential” (A2:X47303) • “Income Factor” (A10:F59833) • “Post Code” (A2:B57823) • “Zonelist” (A2:B169) 							
9.	Attachment 5.9 – Technology plan for 2024-29 Pages 18, 26	Security information	Capex	Information affecting the security of the network	Sensitive security information relating to Ausgrid’s network and operations. Ausgrid is prohibited from publicly disclosing the substance of this confidential information.	Provision of this information has the potential to compromise security. Ausgrid is prohibited from publicly disclosing the substance of this confidential information.	Disclosure would increase risk of Ausgrid being a target of a cyber security attack.	2 / 52
10.	Attachment 5.9.1 – ERP upgrade program Page 59	Security information	Capex	Information affecting the security of the network	Sensitive security information relating to Ausgrid’s network and operations. Ausgrid is prohibited from publicly disclosing the substance of this confidential information.	Provision of this information has the potential to compromise security. Ausgrid is prohibited from publicly disclosing the substance of this confidential information.	Disclosure would increase risk of Ausgrid being a target of a cyber security attack.	1 / 63
11.	Attachment 5.9.2 – Cyber security program Pages 7, 10, 13-16, 22, 24, 28, 32, 36	Security information	Capex	Information affecting the security of the network	Sensitive security information relating to Ausgrid’s network and operations. Ausgrid is prohibited from publicly disclosing the substance of this confidential information.	Provision of this information has the potential to compromise security. Ausgrid is prohibited from publicly disclosing the substance of this confidential information.	Disclosure would increase risk of Ausgrid being a target of a cyber security attack.	11 / 53
12.	Attachment 5.9.3 – Cyber security – CBA model “Benefit Scenarios” worksheet (E2 to P35)	Forecast cost and other consequences on Ausgrid’s operations if identified cyber threats realised Security information	Capex	Market sensitive cost inputs Information affecting the security of the network	Information is sensitive for market negotiation/tender purposes, including in relation to cyber security insurance. Public disclosure would potentially harm Ausgrid’s commercial interests. Sensitive security information relating to Ausgrid’s network and operations.	Disclosing information would adversely impact on Ausgrid’s ability to negotiate a fair and competitive price for insurance cover as insurers would use this information to their advantage and jeopardise the appropriate negotiating advantage Ausgrid has in relation to this information. This will result in higher long-term costs for customers. Provision of this information has the potential to compromise security.	Higher costs such as higher insurance premiums are not in the public interest as they would add to the price of electricity for consumers. Disclosure would increase risk of Ausgrid being a target of a cyber security attack.	1 / 29
13.	Attachment 6.3 – Step changes model ‘Calc Insurance premiums’ worksheet (H34:I51, L34:M37, L39:M39, L43:M52, L81:S84,	Insurance premium cost forecast and start, end and renewal dates	Opex	Market sensitive cost inputs	Information is sensitive for insurance market negotiation/tender purposes. Public disclosure would potentially harm Ausgrid’s	Disclosing information would adversely impact on Ausgrid’s ability to negotiate a fair and competitive price for insurance cover as insurers would use this information to their	Higher insurance premiums (i.e. increased opex) are not in the public interest as they would add to the price of electricity for consumers.	1 / 18

	L86:S86, L90:S100, I102:I103, J103:K121, M104:S107, M109:S109, M113:S122)				commercial interests.	advantage and jeopardise the appropriate negotiating advantage Ausgrid has in relation to this information. This will result in higher long-term costs for customers.		
14.	Attachment 6.4 – Marsh insurance report Pages ³ 1-3, 11, 15-23	Details of insurance policies including limits purchase and deductibles Names of insurers Confidential details of Ausgrid's Distribution Network Lease Details of cyber security insurance arrangements	Opex	Market sensitive cost inputs Strategic information Other Information affecting the security of the network	Information is sensitive for insurance market negotiation/tender purposes. Public disclosure would potentially harm Ausgrid's and third party commercial interests. Ausgrid's is contractually prohibited from publicly disclosing confidential details of Ausgrid's Distribution Network Lease. Details of Ausgrid's cyber security insurance arrangements are sensitive and would jeopardise the security of the network if disclosed publicly.	Disclosing details of Ausgrid's insurance policies would adversely impact Ausgrid's ability to negotiate a fair and competitive price for insurance cover as insurers would use this information to their advantage and jeopardise the appropriate negotiating advantage Ausgrid has in relation to this information. Disclosing limit information would also encourage additional claims (including size of claims), especially for general liability which would lead to increased insurance premiums and in turn increased costs for customers. This will result in higher long-term costs for customers. Disclosing details of cyber security insurance information is highly sensitive and if disclosed would increase risk of cyber attack to Ausgrid's business and operations.	We are not aware of any public benefit in publicly disclosing this information that would outweigh the detriments. Higher insurance premiums (i.e. increased opex) are not in the public interest as they would add to the price of electricity for consumers in the long term. No known benefit of disclosing cyber security insurance arrangements.	13 / 45
15.	Attachment 8.7 – Standalone and avoidable cost model "Volume forecast" worksheet (B51 to C133)	Tariff codes and names	Tariffs	Personal information Market sensitive cost inputs	Information directly identifies the names of individual customers and the tariff code that corresponds with their name.	Our customers' privacy would be breached if their personal information and energy volume forecasts were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business.	It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information.	1 / 17
16.	Attachment 8.8 – Indicative pricing schedule – ACS Pages 21-25	Identification of customers and their forecast individual annual pre-July 2009 public lighting charges	Public lighting	Personal information	The information includes our customers' names and their forecast annual charges for pre-July 2009 assets for the 2024-29 period. It should be treated as confidential as it discloses specific customer	Our customers' privacy would be breached if their annual pre-July 2009 public lighting charges were disclosed without their consent. This may result in customer complaints and negatively impact Ausgrid's	It is not in the long-term interest of consumers for this confidential information to be disclosed. Any short-term economic gain from increased pricing transparency is not outweighed by the public detriment that would be caused from	5 / 25

³ Page numbers cited for this document reflect the page numbers in its footer, not the pdf reader's page count.

					billing information.	reputation.	disclosure of this information.	
17.	Attachment 8.10 – Indicative pricing schedule – DUOS “Indicative prices” worksheet (C196:C274, C279:C357, C362:C440, C445:C523, C528:C606, E196:E274, E279:E357, E362:E440, E445:E523, E528:E606)	National Metering Identifier (NMI) numbers, customer names, and individual network prices	Tariffs	Personal information Market sensitive cost inputs	Information directly identifies customers, their individual network price, and their NMI number. Personal information data has been redacted to de-identify the data.	Our customers’ privacy would be breached if their personal information and energy data were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business.	It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information.	1 / 2
18.	Attachment 8.12 – Indicative pricing schedule – NUOS “Indicative prices” worksheet (C196:C274, C279:C357, C362:C440, C445:C523, C528:C606, E196:E274, E279:E357, E362:E440, E445:E523, E528:E606)	NMI numbers, customer names, and individual network prices	Tariffs	Personal information Market sensitive cost inputs	Information directly identifies customers, their individual network price, and their NMI number. Personal information data has been redacted to de-identify the data.	Our customers’ privacy would be breached if their personal information and energy data were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business.	It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information.	1 / 2
19.	Attachment 8.13 – Embedded network tariff arbitrage model “Data” worksheet (A8:C852)	NMI numbers, customer names and addresses	Tariffs	Personal information Market sensitive cost inputs	Information directly identifies customers, their NMI number and their address in relation to their individually calculated energy usage data for FY2022. Personal information data has been redacted to de-identify the data.	Our customers’ privacy would be breached if their personal information and energy usage data were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business.	It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information.	1 / 3
20.	Attachment 9.7 – Public lighting - pre-2009 fixed charge model 2024-29 Worksheets: <ul style="list-style-type: none">• Report - Customer Charges (B5:G106)• Calc - RAB 2025-29 (A4:C6726)• Calc - Customer Charges (A6:AA107)• Input - Customer Inventory FY15 (B3:B6725)• Calc - Residual Values (B4:B6726)	Identification of customers and their forecast individual annual pre-2009 public lighting charges	Capex Annual pre-2009 public lighting capital charges	Personal information	The output of this model is fixed a public lighting charge for each customer. This is confidential as it discloses how much each customer pays for this element of charges.	Our customers’ privacy would be breached if their annual pre-2009 public charges were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business.	There is no identifiable public benefit in disclosing this information that outweighs the identified detriment. The public version of the model has all customer names removed as well as consolidated annual charges at a customer level. Calculations at an asset group level remain intact.	5 / 12
21.	Attachment 9.8 – Public	Contract material	Capex	Market sensitive	Negotiated supplier material prices are included within the	Disclosure of material prices would breach confidentiality terms in	There is no public benefit in releasing the proposed confidential	3 / 26

	lighting model 2024-29 Worksheets: <ul style="list-style-type: none"> Unit costs (F6:O165) I_CAPEX – Stock Costs (D17:F176) I_CAPEX (J37:J38, L31:32, R49:R110, AB49:437, AK49:AM97, AK103:AM113) 	prices		price inputs	model. Prices are subject to commercial confidentiality terms. All material prices for brackets/luminaires and smart controllers have been redacted, including calculations where both the material price and installation costs are shown.	agreements with suppliers and will affect Ausgrid’s ability to obtain competitive market prices in future tendering processes.	material prices. It is more likely to result in a detriment to customers if this information is disclosed as it will reduce our ability to obtain competitive market prices for these materials in the future.	
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Appendix B: Proportion of confidentiality material notice

The following table sets out our completed proportion of confidential information notice for Ausgrid’s Revised Proposal, in accordance with the AER’s Confidentiality Guidelines. For the purpose of this notice, we have assumed that one sheet in an Excel model is equivalent to one page.

Submission Title	Number of pages of submission that include information subject to a claim of confidentiality	Number of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Ausgrid Revised Proposal for 1 July 2024 – 30 June 2029	102	1,855	1,951	5.21%	94.79%

Note: This is an approximate indication of the proportion of Ausgrid’s Revised Proposal for 1 July 2024 to 30 June 2029 that is subject to a claim of confidentiality compared to that which is not.