

# Attachment 12.3 Confidentiality Claim 2025-30

31 January 2024





### **OVERVIEW**

Clause 6.8.2(c)(6) of the National Electricity Rules (NER) requires that Ergon Energy must identify the parts of its regulatory proposal that are confidential and should be suppressed from publication.

This document provides the relevant details of:

- each piece of information Ergon Energy claims is confidential (Section 1: Documentation and Section 2: Excel Models), and
- the proportion of Ergon Energy's regulatory proposal that includes confidential information (Section 3)

in accordance with the Australian Energy Regulator's Distribution Confidentiality Guideline.



## 1. Confidential information

Document containing the confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Identify the recognised confidentiality category that the confidential information falls within	Provide a brief explanation of why the confidential information falls into the selected category	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	No of pages containing confidential information / total no. of pages
Section 5.8 – ICT I	Expenditure							
Ergon - 5.8.01 - Non-network ICT Plan 2025-30 - January 2024 - Confidential	Page 5, Paragraph 5, Dot Point 2	Cyber Security	Non-network ICT	Information affecting the security of the network	This information could provide details of Energy Queensland's cyber security strategy	Disclosure could provide potential threat actors with additional information which could be utilised in cyber- attacks against Energy Queensland.	The compromise of core operational technology could have a significant impact on Energy Queensland's customers and the market.	8 / 33
	Page 7, Table 1 (row 1, benefit column)	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to a specific contractual arrangement	Disclosure of information has the potential to jeopardise future investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	No public benefit would be gained from the disclosure of this information. Disclosure could result in higher prices from suppliers – increasing costs and therefore resulting in increased customer costs.	
	Page 11 and 12, Table 2 (two columns)	Infrastructure Renewal and Investment Timeframes	Non-network ICT	Market sensitive cost inputs, Other	Information relates to specific timings of investment in technology assets. The assets will be procured from the market, so these timings are sensitive	Disclosure of information has the potential to jeopardise commercial negotiations at time of upgrades/refresh of assets. The market will price according to knowledge of our submission, impacting our ability to source a commercially competitive offer.	No public benefit would be gained from the disclosure of this information. Disclosure could result in higher prices from suppliers – increasing costs and therefore resulting in increased customer costs.	



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	Page 20, Table 3 (rows 2 and 3) Page 22, Figure 13 (vertical axes) and Table 5 (rows 1 to 6)	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Opex information is from procured systems and supplier prices and information related to commercial contracts, therefore costs are commercially sensitive. If totex is published, opex can be derived, which is commercially sensitive as described above.	The market will price according to knowledge of our submission, and so we will not get a commercially competitive offer. Disclosure of costs would affect our ability to obtain competitive prices in future transactions for technology assets, software and labour.	Disclosure could result in higher prices from suppliers – increasing costs and therefore resulting in increased customer costs.	
	Page 23, Table 7 and Figure 14 (vertical axes)	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to commercial sensitive costs for each Business Case	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers – increasing costs and therefore resulting in increased customer costs.	
	Page 33, Table 12 (column 1)	Commercially sensitive financial information	Non-network ICT	Other	The ICT business case titles have been removed from the SCS Capex model to maintain confidentiality. This table provides the mapping between the ICT business cases and the SCS Capex model, which would allow the reader to identify commercially sensitive	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers – increasing costs and therefore resulting in increased customer costs.	



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					costs for each Business Case if published.			
Ergon - 5.8.02 - ICT Business Case Asset and Works Management - January 2024 - Confidential	Page 4, Cost table Page 26, Table 5 Page 39, Table 18	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to commercial sensitive costs.	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs.	3 / 39
	Page 26, Figure 8	Investment Timeframes	Non-network ICT	Market sensitive cost inputs	Information relates to specific timings of investment in technology assets. The assets will be procured from the market, so these timings are sensitive	Disclosure of information has the potential to jeopardise commercial negotiations at time of upgrades/refresh of assets. The market will price according to knowledge of our submission, and so there is the risk we will not get a commercially competitive offer.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs	
Ergon - 5.8.03 - ICT Business Case Customer - January 2024	Page 3, Cost table Page 24, Table 6 Page 37, Table 18	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to commercial sensitive costs	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs.	4 / 38
	Page 23, Figure 9	Investment Timeframes	Non-network ICT	Market sensitive cost inputs	Information relates to specific timings of investment in	Disclosure of information has the potential to jeopardise	Disclosure could result in higher prices from suppliers - increasing costs and	



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					technology assets. The assets will be procured from the market, so these timings are sensitive	commercial negotiations at time of upgrades/refresh of assets. The market will price according to knowledge of our submission, and so there is a risk we will not get a commercially competitive offer.	therefore resulting in increased customer costs	
Ergon - 5.8.04 - Business Case Cyber Security - January 2024 - Confidential	Page 4, Cost table Page 9, Figure 1 Page 11, Figures 3 and 4 Page 13, Figure 5 Page 15, Figure 6 and last three paragraphs Page 16, Dot points 1 to 4, 6 and 7 Page 17, Dot points 2 and 3 Page 19, Figure 7 and last four paragraphs Page 20, Figure 8, dot point 1 and paragraphs 1 to 3 Page 21, Figure 9 and all text	Information pertaining to cyber security Commercially sensitive financial information	Cyber Security	Information affecting the security of the network Market sensitive cost inputs	Information relating to current state, future state capabilities and investments which address vulnerabilities in both ICT and OT as it relates to cyber security This information could provide details of cyber security strategy and costs, which could adversely impact cyber security and competitive tender processes.	Disclosure of information has the potential to jeopardise ICT and OT network security Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher Cyber Security risks If published this information will compromise ability to maintain adequate cyber security placing the network at significant risk. If the commercially sensitive financial information is published these may impact our ability to deliver the lowest possible cost solutions. Both these impacts will be detrimental to customer's interests.	25 / 44



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	Page 22, Paragraphs 2 to 5 Page 23, Figure 10 Pages 24 and 25, Table 5 Page 26, Paragraph 2, 4 and 5 Page 29, Dot points 1 to 3 Page 30, Figure 12 and paragraph 1 Page 31, Table 6 Page 34, Table 12 Pages 35 and 36, Table 13 Page 37, All dot points Page 38, Table 15 Page 43, Table 19 Page 44, Table 20							
Ergon - 5.8.05 - ICT Business Case Data & Intelligence - January 2024 - Confidential	Page 4, Cost table Page 25, Table 5 Page 38, Table 17	Commercially sensitive financial information	Non-network ICT	Market sensitive cost	Information relates to commercial sensitive costs	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs.	4 / 38
	Page 24, Figure 8	Investment Timeframes	Non-network ICT	Market sensitive cost inputs, other	Information relates to specific timings of	Disclosure of information has the	Disclosure could result in higher prices from suppliers	



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					investment in technology assets. The assets will be procured from the market, so these timings are sensitive	potential to jeopardise commercial negotiations at time of upgrades/refresh of assets. The market will price according to knowledge of our submission, and so we will not get a commercially competitive offer.	- increasing costs and therefore resulting in increased customer costs	
Ergon - 5.8.06 - ICT Business Case Digital Core - January 2024 - Confidential	Page 4, Cost table Page 22, Table 5 Page 36, Table 17	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to commercial sensitive costs	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs.	3 / 36
	Page 22, Figure 8	Investment Timeframes	Non-network ICT	Market sensitive cost inputs, other	Information relates to specific timings of investment in technology assets. The assets will be procured from the market, so these timings are sensitive	Disclosure of information has the potential to jeopardise commercial negotiations at time of upgrades/refresh of assets. The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs	



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Ergon - 5.8.07 - ICT Business Case Digital Foundations - January 2024 - Confidential	Page 4, Cost table Page 24, Table 5 Page 38, Table 17	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to commercial sensitive costs	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs.	3 / 38
	Page 24, Figure 8	Investment Timeframes	Non-network ICT	Market sensitive cost inputs, other	Information relates to specific timings of investment in technology assets. The assets will be procured from the market, so these timings are sensitive	Disclosure of information has the potential to jeopardise commercial negotiations at time of upgrades/refresh of assets. The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer.	Disclosure could result in higher prices from suppliers – increasing costs and therefore resulting in increased customer costs	
Ergon – 5.8.08 – ICT Business Case Integrated Grid Planning – January 2024 – Confidential	Page 5, Cost table Page 27, Table 5 Page 43, Table 17	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to commercial sensitive costs	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices or may affect the competitive nature of future tenders.	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs.	3 / 43
	Page 27, Figure 8	Investment Timeframes	Non-network ICT	Market sensitive cost inputs, other	Information relates to specific timings of investment in technology assets. The assets will be procured	Disclosure of information has the potential to jeopardise commercial negotiations at time of	Disclosure could result in higher prices from suppliers - increasing costs and therefore resulting in increased customer costs	



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					from the market, so these timings are sensitive	upgrades/refresh of assets. The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer.		
Ergon – 5.8.09 – ICT Post Implementation Review Summaries – November 2023 - Confidential	Page 3, Capex table, rows 2 to 4 Page 4, Benefits table, row 2 Page 4, Summary of Assessment table, rows 5 and 6 Page 6, Capex table, rows 2 to 4 and last paragraph Page 7, Benefits table, rows 2 to 4 Page 8, Summary of Assessment table, row 6 Page 10, Capex table, rows 2 to 4 Page 18, Capex table, rows 2 to 4	Commercially sensitive financial information	Non-network ICT	Market sensitive cost inputs	Information relates to outcomes for specific groups within Energy Queensland	Disclosure of information has the potential to garner insights into third party commercial arrangements could be derived, impacting ability to obtain fair market prices and jeopardise future investment outcomes	No public benefit would be gained from the disclosure of this information.	14 / 22
	Page 12 to 17	Information pertaining to cyber security	Cyber Security	Information affecting the security of the network	Information relating to current state, future state capabilities and investments in both the ICT and OT	Disclosure of information has the potential to garner insights into third party commercial arrangements could be	Disclosure could result in higher Cyber Security risks	



Page and paragraph number	Description of		Identify the recognised		Specify reasons		No of pages
	the confidential information	Topic the confidential information relates to	confidentiality category that the confidential information falls within	Provide a brief explanation of why the confidential information falls into the selected category	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	confaining confidential information / total no. of pages
					derived, impacting ability to obtain fair market prices and jeopardise future investment outcomes		
ty, Fleet, Tools and I	Equipment						
p4, Table1 p33, Table 3 p34, Table 4 p35, Table 6	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer	The consumers of Queensland will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	5/43
p19, section 2.5	Highlights the criticality of the infrastructure located at this site	Critical infrastructure	Information affecting the security of the network	Redacted information, if made public, may jeopardise security of the Ergon or Energex networks or our ability to effectively plan and operate the network.	Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur.	Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer.	
p4, table row 6 p18, Table 2 p18, Table 3	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a	The consumers of QLD will not get the most cost effective outcome as vendors will price to the	6/27
	<ul> <li>7, Fleet, Tools and I</li> <li>4, Table 1</li> <li>33, Table 3</li> <li>34, Table 4</li> <li>35, Table 6</li> <li>19, section 2.5</li> <li>4, table row 6</li> <li>18, Table 2</li> </ul>	4, Table1       Commercially sensitive financial information         33, Table 3       information         34, Table 4       information         35, Table 6       Highlights the criticality of the infrastructure located at this site         19, section 2.5       Highlights the criticality of the infrastructure located at this site         4, table row 6       Commercially sensitive financial         18, Table 2       Commercially sensitive financial	4, Table1       Commercially sensitive financial information       Capital expenditure         33, Table 3       Highlights the criticality of the infrastructure located at this site       Critical infrastructure located at this site         19, section 2.5       Highlights the criticality of the infrastructure located at this site       Critical infrastructure located at this site         4, table row 6       Commercially sensitive financial       Capital expenditure	4, Table1       Commercially sensitive financial information       Capital expenditure       Market sensitive cost inputs         19, section 2.5       Highlights the criticality of the infrastructure located at this site       Critical infrastructure located at this site       Information affecting the security of the network         4, table row 6       Commercially sensitive financial       Critical infrastructure       Information affecting the security of the network         4, table row 6       Commercially sensitive financial       Capital expenditure       Market sensitive cost inputs	Information falls within       the selected category         Information       Capital expenditure         Market sensitive cost inputs       The project will be put to tender so these estimates are commercially sensitive         19, section 2.5       Highlights the criticality of the informatructure located at this site       Critical infrastructure         Information affecting the security of the network       Critical expenditure       Redacted information, if made public, may inetworks or our ability to effectively plan and operaties security of the network.         Information 2.5       Highlights the critical infrastructure       Critical infrastructure       Information affecting the security of the network.         Information 2.5       Highlights the critical infrastructure       Critical infrastructure       Information affecting the security of the network.         Information 2.5       Highlights the critical infrastructure       Critical infrastructure       Information affecting the security of the network.         Information 2.5       Highlights the critical infrastructure       Critical infrastructure       Information affectively plan and operate the network.         Information 2.5	Information falls within       the selected category       confidential information         Information       Information       Information         Information       Gerived, impacting ability to obtain fair market prices and jeopardise future investment outcomes         Information       Commercially sensitive financial information       Capital expenditure         A, Table 3       Commercially sensitive financial information       Capital expenditure       Market sensitive cost inputs       The project will be put to tender so these estimates are commercially sensitive for according to knowledge of our submission, and scording to knowledge of our submission and scording to the network index or entropy of the infrastructure located at this site and the acceding to the network sor our ability or the infrastructure located at this site and the activative sort interns of loss of the perductivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur.         4, table row 6       Commercially sensitive financial constitue project will be put to find to knowledge of our submission, and       The market will price according to knowledge of our submission,	Information falls within         the selected category         confidential information         benefit           A         Table 1 33, Table 3 34, Table 4         Commercially sensitive financial information         Capital expenditure         Market sensitive cost inputs         The project will be put to tender so these estimates are commercially sensitive of our submission, and sociated at this site         The consumers of Queensiand will not get the most cost effective outcomes           19, section 2.5         Highlights the infrastructure located at this site         Crtical infrastructure located at this site         Crtical infrastructure self         Information         Redacted information, if made public, may ecurity of the network.         The project will be put to ender so these estimates are commercially sensitive         The consumers of Queensiand will not get the most cost effective outcomes           19, section 2.5         Highlights the infrastructure located at this site         Crtical infrastructure located at this site         Crtical infrastructure and effective outcomes         Redacted information, if made public, may ecurity of the network.         Redacted information, if made public, may effectively plan and operate the network.         Highlightightightightightightightightightight



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January 2024 – Confidential	p19, Table 4 p20, Figure 3 p21, Table 6 p25, Table 8					commercially competitive offer	budget, not competitive pressures	
Ergon - 5.9.03A - Business case Non-network Property - Bundaberg Depot - January 2024 – Confidential	p3, table row 6 p11, Table 7 p20, Table 10 p21, Figure 5 p21, Table 11 p22, Table 12 p26, Table 14	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer	The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	8/28
	p8, Table 5	Example details of safety incidents	Safety incidents at site	Other	Information relates to specific safety incidents at the site	Disclosure of information (without detailed background/context) has the potential to impact the reputation of the business	There is no identifiable public benefit in disclosing this information.	
	p14, Table 9	Examples of other leased sites (historical and current)	Address details	Information affecting the security of the network	Redacted information, if made public, may jeopardise security of the Ergon or Energex networks or our ability to effectively plan and operate the network	Highlighting a detailed list of sites leaves the business exposed, should physical breaches or malicious damage occur. In addition, the list contains historical sites which are no longer leased by the DNSP.	There is no identifiable public benefit in disclosing this information.	
Ergon - 5.9.04A - Business case	p3, table row 6 p20, Table 6	Commercially sensitive	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these	The market will price according to knowledge	The consumers of QLD will not get the most cost	6/27



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Non-network Property - Sarina Depot - January 2024 – Confidential	p20, Figure 4 p21, Table 7 p22, Table 8 p25, Table 10	financial information			estimates are commercially sensitive	of our submission, and so we may not get a commercially competitive offer	effective outcome as vendors will price to the budget, not competitive pressures	
	p14, Table 5	Examples of other leased sites (historical and current)	Address details	Information affecting the security of the network	Redacted information, if made public, may jeopardise security of the Ergon or Energex networks or our ability to effectively plan and operate the network	Highlighting a detailed list of sites leaves the business exposed, should physical breaches or malicious damage occur. In addition, the list contains historical sites which are no longer leased by the DNSP.	There is no identifiable public benefit in disclosing this information.	
Ergon - 5.9.05A - Business case Non-network Property - Townsville Training - January 2024 – Confidential	p3, Table row 6 p10, Table 2 p14, Table 3 p16, para 8 p20, para 14 p22, Table 5 p22, Table 6 p24, Table 8 p27, Table 10	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer	The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	8/29
	p15, Table 4	Examples of other leased sites (historical and current)	Address details	Information affecting the security of the network	Redacted information, if made public, may jeopardise security of the Ergon or Energex networks or our ability to effectively plan and operate the network	Highlighting a detailed list of sites leaves the business exposed, should physical breaches or malicious damage occur.	There is no identifiable public benefit in disclosing this information.	



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						In addition, the list contains historical sites which are no longer leased by the DNSP.		
Ergon - 5.9.06 – Fleet Plan 2025- 30 - January 2024 - Confidential	p21, Table 7	Commercially sensitive information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	1/29
Ergon - 5.9.07A - Business Case Non-Network Fleet - EWP Replacement - January 2024 - Confidential	p3, Table row 6 p7, Figure 3 p10, Table 5 p11, Table 7 p13, Table 9 p14, Table 11 p17, Table 13 p19-21, App 4	Commercially sensitive information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	9/23
Ergon - 5.9.08A - Business Case Non-Network Fleet -Crane Borer Replacement - January 2024 - Confidential	p4, Table row 1 p7, Figure 3 p9, Table 4 p10, Table 6 p12, Table 8 p15, Table 10 p17-18, App 4	Commercially sensitive information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	7/19



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Ergon – 6.05 - Business Case Smart Meter Data Acquisition– January 2024 - Confidential	p8, dot point 3 p8, paragraph 2 & 3 p8, Table 1 p9, paragraph 1 p15, dot point 11 & 12 p18, paragraph 2, dot points 2 and 3 p21, paragraph 1, dot points 2 and 3	Commercially sensitive information	Operating expenditure	Market sensitive cost inputs	We will be negotiating with a number of metering data and analytics providers for advanced data and an analytics platform.	Ergon would face a detriment in negotiating costs if we were to publish our expected unit rates in the regulatory proposal. Providers would also face a detriment if they were to have their costs exposed in the regulatory proposal.	The consumers of Queensland will not get the most cost-effective outcome as vendors will price to the budget, not competitive pressures.	5/30
Chapter 8 – Annua	I Revenue Requireme	ent						
Ergon - 8.05 - Rate of return (averaging periods) - January 2024 - confidential	Whole document	Commercially sensitive information	Revenue	Market sensitive information	The information is confidential because it specifies the date/s when Ergon expects to raise debt.	Disclosure of Ergon's proposed dates on which it proposes to raise debt would potentially influence the behaviour of prospective lenders.	As the return on debt is a key input to the Rate of Return Ergon receives on its assets, not receiving an efficient market rate will have a detrimental impact on the price customers will ultimately pay for the distribution of electricity.	4



#### 2. Confidential information: Excel Models

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RINS								
Ergon - RIN.10 – Generator Contract Costs - January 2024 - confidential	Entire document	Commercially sensitive financial information	Network Opex	Market sensitive cost inputs	Information relates to contracts we are currently involved in for the deferral of network capex.	Disclosure of information has the potential to jeopardise investment outcomes and the ability to obtain fair market prices when these contracts come to an end and we engage with other parties to assess the capability to continue	No public benefit would be gained from the disclosure of this information	1
Section 5.8 – ICT Expenditure								
Ergon - 5.8.11 - Non-network ICT Forecast Model – November 2023 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information relates to commercially sensitive information	Disclosure of information has the potential to jeopardise investment outcomes and ability to obtain fair market prices	The consumers of Queensland will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	6
Section 5.9 – Property, Fleet, Tools and Equi	oment							
Ergon - 5.9.02B - NPV Model Non-network Property - Banyo Workshop - January 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer	The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	9
Ergon - 5.9.03B - NPV Model Non-network Property - Bundaberg Depot - January 2024 - Confidential	All	Commercially sensitive	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are	The market will price according to knowledge of our submission, and so we may not get a	The consumers of QLD will not get the most cost effective outcome as vendors will price to the	8

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Document containing the confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Identify the recognised confidentiality category that the confidential information falls within	Provide a brief explanation of why the confidential information falls into the selected category	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	No of pages containing confidential information / total no. of pages
		financial information			commercially sensitive	commercially competitive offer	budget, not competitive pressures	
Ergon - 5.9.04B - NPV Model Non-network Property - Sarina Depot - January 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer	The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	8
Ergon - 5.9.05B - NPV Model Non-network Property - Townsville Training - January 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	The project will be put to tender so these estimates are commercially sensitive	The market will price according to knowledge of our submission, and so we may not get a commercially competitive offer	The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures	8
Ergon - 5.9.07B - NPV Model Non-Network Fleet - EWP Replacement - January 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	6
Ergon - 5.9.08B - NPV Model Non-Network Fleet - Crane Borer Replacement - January 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	5
Ergon - 5.9.09 - Non-network Fleet forecast replacement model - January 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	13
Chapter 6 – Operating Expenditure								



Document containing the confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Identify the recognised confidentiality category that the confidential information falls within	Provide a brief explanation of why the confidential information falls into the selected category	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	No of pages containing confidential information / total no. of pages
Ergon – 6.05B – NPV Model Smart Meter Data Acquisition – January 2024 - Confidential	All	Commercially sensitive information	Operating expenditure	Market sensitive cost inputs	We will be negotiating with a number of metering data and analytics providers for advanced data and an analytics platform.	Ergon would face a detriment in negotiating costs if we were to publish our expected unit rates in the regulatory proposal. Providers would also face a detriment if they were to have their costs exposed in the regulatory proposal.	There is little public benefit in knowing the costs of these systems given they are particular to the use cases of a DNSP, rather than our customers themselves. Customers will know from our proposal	9
Chapter 8 – Annual Revenue Requirement	•		•					
Ergon - 8.04 - Model - SCS Leases - January 2024 - confidential	All	Commercially sensitive financial information	Property Leases	Market sensitive cost inputs	Information relates to sensitive third party commercial arrangements	Disclosure of information has the potential to garner insights into third party commercial arrangements we have with landlords. The lease information for some of our agreements are not currently publicly available. This could impact our ability or the landlords ability to obtain fair market prices in the future.	No public benefit would be gained from the disclosure of this information.	4
Chapter 11 – Alternative Control Services								
Ergon- 11.06 - ACS Ancillary services model – January 2024 - confidential	Tab - Input   Fee Based   ERG – cell range AR12: AR142	Contractor rates	Alternative Control Services	Market sensitive cost inputs	Contract rates have been negotiated through confidential procurement contracts. Disclosing	Disclosure of contractor rates could potentially influence the behaviour of prospective contractors	The ability to obtain competitive pricing is key to consumer affordability	13



Document containing the confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Identify the recognised confidentiality category that the confidential information falls within	Provide a brief explanation of why the confidential information falls into the selected category	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	No of pages containing confidential information / total no. of pages
					such information would be detrimental to Ergon and the contractors			
	Tab - Calc   Fee Based – cell range AR10: AR130	Contractor rates	Alternative Control Services	Market sensitive cost inputs	Contract rates have been negotiated through confidential procurement contracts. Disclosing such information would be detrimental to Ergon and the contractors	Disclosure of contractor rates could potentially influence the behaviour of prospective contractors	The ability to obtain competitive pricing is key to consumer affordability	
Ergon – 11.11 – ANS Fee-based Services Comparison - confidential	Tab – List of Fee-based Services – cell range Q5: R313	Contractor rates	Alternative Control Services	Market sensitive cost inputs	Contract rates have been negotiated through confidential procurement contracts. Disclosing such information would be detrimental to Ergon and the contractors	Disclosure of contractor rates could potentially influence the behaviour of prospective contractors	The ability to obtain competitive pricing is key to consumer affordability	1



## 3. Proportion of confidential information

Number of pages of Submission Title Submission title 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
Ergon Energy Regulation Proposal 2025-30	217	4,115	4,332	5.0%	95.0%

Note:

This notice is an approximate indication of the proportion and comparative proportion of material in Ergon Energy's regulatory proposal that is subject to a claim of confidentiality compared to that which is not.

For excel files, each worksheet has been counted as one page.