



CONFIDENTIALITY CLAIM

PAL RIN 04 – PUBLIC
2026-31 REVISED PROPOSAL

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1. Confidentiality template

TITLE, PAGE AND PARAGRAPH NUMBER OF DOCUMENT CONTAINING THE CONFIDENTIAL INFORMATION	DESCRIPTION OF THE CONFIDENTIAL INFORMATION	TOPIC THE CONFIDENTIAL INFORMATION RELATES TO (E.G. CAPEX, OPEX, THE RATE OF RETURN ETC)	IDENTIFY THE RECOGNISED CONFIDENTIALITY CATEGORY ¹ THAT THE CONFIDENTIAL INFORMATION FALLS WITHIN	PROVIDE A 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)
1. Attachments						
PAL RRP ATT 3.1.01 – Houston Kemp – Contract labour escalation – Dec2025 – Confidential Sections 2.4.1, 3.2.1, 3.4 Pages 14, 20, 24, 25	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.5.01 – geospatial appreciation of wooden pole replacement – Dec2025 – Confidential [whole document]	Identification of areas of the network most susceptible to fire risk	Capex	Information affecting the security of the network	Identification of areas of the network most susceptible to fire risk	Major security risk of exposing vulnerable areas of the network	The detriment to customers from increasing the risk of bushfires on the network outweighs the public benefit of detailed information regarding our areas of focus for wooden pole replacement.
PAL RRP ATT 3.6.04 Data centre contract 01 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the

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					their proposed activities which raises privacy considerations.	business' ability to negotiate optimal pricing Provision of this information does not provide any public benefit and may breach privacy obligations
PAL RRP ATT 3.6.05 Data centre contract 02 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.06 Data centre contract 03 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.07 Data centre contract 04 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.08 Data centre contract 05 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.09 Data centre contract 06 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.10 Data centre contract 07–Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.11 Data centre contract 08 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.12 Data centre contract 09 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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PAL RRP ATT 3.6.13 Data centre contract 10 – Dec2025 – Confidential [whole document]	Contract scope, terms and pricing between the business and the data centre proponent. Identification of potential data centre locations.	Capex	Market sensitive cost inputs Market intelligence Strategic information Personal information	Includes private contractual rates, terms and conditions Identification of customers by name Identification of potential areas requiring the acquisition of land or easements	Disclosing this information would affect the business' ability to negotiate competitive contractual arrangements. Disclosure of actual costs and margins would also compromise the proponent's contracts with other parties and any future contract negotiations they may enter into. The information directly identifies customers and their proposed activities which raises privacy considerations.	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive negotiation process or restrict the business' ability to negotiate optimal pricing

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						Provision of this information does not provide any public benefit and may breach privacy obligations
PAL RRP ATT 4.03 – Marsh – Report on insurance premiums – Dec2025 – Confidential Figures 5, 6 Tables 2, 3 Sections 1.3, 1.5, 5.2, 5.4, 5.5, 6.2, 7.3, 7.4, 7.5, 8.1, 8.2 Appendix A	Cost assumptions and estimates	Opex	Market sensitive cost inputs	Includes cost assumptions and estimates	Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers

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Pages 9 - 10, 20 - 22, 24 - 29, 36, 38 - 39, 41 - 43, 45 - 47, 51 - 52, 54						
PAL RRP ATT 4.04 – HoustonKemp - Victorian DNSP insurance premiums – Dec2025 – Confidential Tables 3.2, 3.3, 3.4, 5.1, 5.2, A2.3 Sections 3.1, 3.3, 3.9, 5.5 Appendix 1 Attachment 2 Pages 22, 24, 25, 27, 43, 45, 53, 74	Cost assumptions and estimates	Opex	Market sensitive cost inputs	Includes cost assumptions and estimates	Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers

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2. Models						
PAL RRP MOD 3.4.10 - Transformer cost breakdown - Dec2025 - Confidential [entire model]	Cost assumptions and estimates	Capex	Market sensitive cost inputs	Includes cost assumptions and estimates	Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers
PAL RRP MOD 3.6.01 - Connections - Dec2025 - Confidential [entire model]	Customer names, forecast capacities, negotiated pricing	Capex	Personal information Market sensitive cost inputs	Identification of customers by name Identification of costs and forecast volumes could prejudice negotiations with future customers	The information directly identifies customers and their proposed activities which raises privacy considerations Disclosing costs, volumes and other pricing information would undermine any future competitive negotiations	Provision of this information does not provide any public benefit and may breach privacy obligations Not in the public interest to undermine competitive negotiation processes or to restrict the business' ability to negotiate optimal pricing. This would lead to

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						higher prices for all customers
PAL RRP MOD 4.01 - Vegetation management - Dec2025 - Confidential [entire model]	Span unit rates, incentive payments and span volumes	Opex	Market sensitive cost inputs	Identification of unit rates, other costs and volumes could prejudice negotiations with future providers	Disclosing unit rates, volumes and pricing would undermine any future competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers

Confidentiality category

A NSP must categorise the confidential information into one of the following confidentiality categories:

- *Information affecting the security of the network* - information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network.
- *Market sensitive cost inputs* - information such as supplier prices, internal labour costs, and information which would affect the NSP's ability to obtain competitive prices in future infrastructure transactions, such as tender processes.
- *Market intelligence* - information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities.
- *Strategic information* – information such as the acquisition of land and easements, where the release of this information might adversely impact the NSP's ability to negotiate a fair market price for these items.
- *Personal information* - information about an individual or customer whose identity is apparent or can reasonably be ascertained from the information which raises privacy considerations.
- *Other* - information which the NSP claims is confidential but does not fit into one of the above categories.

2. Proportion of confidential material

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
Revised regulatory proposal	0	88	88	0%	100%
Tariff structure statement - explanatory	0	71	71	0%	100%
Tariff structure statement - compliance	0	37	37	0%	100%
Business cases	0	285	285	0%	100%
Attachments	676	839	1,515	45%	55%
Models	29	680	709	4%	96%
Reset RIN documents	0	64	64	0%	100%
TOTAL	705	2,064	2,769	25%	75%

Note: This is an approximate indication of the proportion of Powercor's revised proposal for 2026-31 that is subject to a claim of confidentiality compared to that which is not



For further information visit:



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CitiPower and Powercor Australia