

# Attachment 7: Confidentiality register

Evoenergy pass-through application

Unlocking CER benefits through Flexible Trading  
Arrangements

Submission to the Australian Energy Regulator

**December 2025**

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# 1. Evoenergy pass-through application Unlocking CER benefits through Flexible Trading Arrangements confidentiality register

*Table 1 Evoenergy pass-through application Unlocking CER benefits through Flexible Trading Arrangements confidentiality register*

Title page and paragraph number of the document	Description of the confidential information	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
Evoenergy – Attachment 2 – FTA cost model – November 2025 – Confidential	Detailed cost build-up, labour rates, vendor pricing contained in the spreadsheet.	Cost build up and inputs for Flexible Trading Arrangements (FTA) implementation.	Market-sensitive information	This information contains underlying (contractor) labour and vendor costs which, if published, could affect Evoenergy's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm Evoenergy's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Evoenergy – Attachment 4 – Gentrack quote - November 2025 – Confidential	Vendor quoted prices, discounts, licensing constructs, support SLAs, delivery milestones, and negotiated commercial terms.	Procurement approach and vendor assessment	Market-sensitive information	Quotes obtained are commercial-in-confidence. Revealing pricing and terms undermines current and future negotiations with Gentrack and alternative vendors.	Competitors could reverse-engineer Gentrack's pricing; suppliers may harden pricing in future rounds; Evoenergy's ability to secure value in renewals or expansions would be compromised, increasing costs to customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.

Title page and paragraph number of the document	Description of the confidential information	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
Evoenergy – Attachment 5 – FTA cost pass through requirements for May 2026 release – November 2025 – Confidential	Contains detailed information about Evoenergy's system architecture and the specific changes required for individual system components to implement the FTA rule change.	ICT system architecture	Information affecting security of Evoenergy's network	Information about Evoenergy's systems and the changes required for specific system components is highly sensitive and may expose potential vulnerabilities.	Disclosure could compromise the security and integrity of critical energy infrastructure by exposing system design, integration points, and operational processes, increasing the risk of cyberattacks or malicious interference.	While the detriment from publication is clear, Evoenergy considers there to be no material public benefit in disclosing this information.
Evoenergy – Attachment 6 – FTA cost pass through requirements for November 2026 release – November 2025 – Confidential	As above	As above	As above	As above	As above	As above

**Table 2 Evoenergy pass-through application *Unlocking CER benefits through Flexible Trading Arrangements* proportion of confidential material**

Submission title	Number 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
Evoenergy – Attachment 2 – FTA cost model – November 2025 – Confidential	1	0	1	100%	0%
Evoenergy – Attachment 4 – Gentrack quote - November 2025 – Confidential	1	0	1	100%	0%
Evoenergy – Attachment 5 – FTA cost pass through requirements for May 2026 release – November 2025 – Confidential	12	0	12	100%	0%
Evoenergy – Attachment 6 – FTA cost pass through requirements for November 2026 release – November 2025 – Confidential	29	0	29	100%	0%
Total	43	0	43	100%	0%

Note: Attachment 2 FTA cost model counted as one page for this purpose.