



Supporting
document 18.3

Confidentiality Claim

2020-2025
Regulatory Proposal
January 2019

Attachment 1 - Confidentiality template

Ref:	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 that the confidential information falls within. <ul style="list-style-type: none"> - Information affecting the security of the network - Market sensitive cost inputs - Market intelligence - Strategic information - Personal information - Other 	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.	5.32 IT Investment Plan Figure C.3 Pg 55 Paragraph 3 Pg 56	Approach to costing	Capex	Market sensitive cost inputs	Information such as supplier prices, internal labour costs and information which would affect our ability to obtain competitive prices in future transactions, such as tender processes, will advantage our suppliers.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
2.	6.3 Critical Infrastructure Obligations Business Case Paragraph 4 Pg 2 Table 1 Pg 3 Paragraph 3 & 4 Pg 3 Paragraph 3 Dot Point 5 & 6 Pg 4 Paragraph 3 Pg 9 Table 2 Pg 15 Section 5.1.2 various Pg 16 Section 5.1.3 various Pg 17 Table 3 Pg 18 Paragraph 2 Pg 19 Paragraph 1 & 3 Pg 21 Dot Point 1&2 Pg 22 Dot Point 5&6 Pg 23 Table 4 Pg 23	Strategic Approach – details of potential vendors	Opex, Security	Market sensitive cost inputs Market intelligence Personal information	Information such as supplier prices, internal labour costs and information which would affect our ability to obtain competitive prices in future transactions, such as tender processes, will advantage our suppliers.	The business case contains information on operational and forecast costs along with current vendor information.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
3.	6.1 IT Infrastructure Business Case TOC notes Pg 3 Table 2 Pg 17 Figure 5 Pg 53 Figure 6 Pg 54 Section 5.2.6 Pg 55 Section 7.1 various Pg 57 Paragraph 4 Pg 58 Paragraph 1 Pg 59 Figure 8 Pg 59 Figure 9 Pg 60 Figure 11 and 12 Pg 62 Table 24 Pg 63 Appendix E Pg 72 to 77	Strategic approach – details of potential vendors	Capex, Opex	Market sensitive cost inputs	Information such as supplier prices, internal labour costs and information which would affect our ability to obtain competitive prices in future transactions, such as tender processes, will advantage our suppliers.	The business case contains technology usage, capacity and criticality information, along with costs and our strategic approach.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
4.	5.34 IT Asset Management Plan 2019-2023	Details of critical applications	Capex Opex Network security	Information affecting security of the Network	This information shows the criticality of applications to SAPN.	If this information was disclosed, it would provide external parties	It is imperative for safety, customer service, reliability and reputational reasons that we keep our environment secure and therefore it is not in

	Appendix A All tables on Pg 22-24 Appendix B Table 5, Pg 25					information to exploit the security of the IT network.	the public interest that this information be disclosed.
5.	6. 7 - KPMG - Independent Analysis of Service Arrangements Tables on pages 2, 18, 19 (+ selected text), 20 (3 tables), 21 (+ selected text), 3, 24, 27, 29.	Details of contract costs	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Information may advantage potential suppliers.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs. Removal of cost inputs does not diminish the conclusions from the report.
6.	5.12 - BIS Oxford Economics - Gross Customer Connections Expenditure Forecasts to 2025/26 3.4.2 Major Projects List table	Details of SA Power Networks' potential major customer projects over the 2020-25 RCP	Capex, Connections	Personal information	This is sensitive information about SA Power Networks' customers.	This information could be detrimental to the customers detailed in this table. It may provide market insight to the competitors of these customers regarding their future projects / developments.	The public has access to the remainder of the report which details the major customer connections forecast over the 2020-25 RCP. There is no additional public benefit if we release this additional information, while customer information privacy could be infringed.
7.	18.12 - Board Paper - Extension of CHED Service Agreements - August 2018 Selected text on page 1, 2, table on page 3.	Value of contract costs.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Information may advantage potential suppliers.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs. Removal of cost inputs does not diminish the conclusions from the report.
8.	18.13 - Board Approval Extension of CHED Services Agreement - September 2018 Selected text.	Value of contract costs.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Information may advantage potential suppliers	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs. Removal of cost inputs does not diminish the conclusions from the report.
9.	18.14 - CHED Services FRC Shared Services Agreement - December 2018 Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts. Contract may contain personal information.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms or privacy concerns.
10.	18.15 - CHED Services IT Support Services Agreement - December 2018 Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts. Contract may contain personal information.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms or privacy concerns.
11.	18.16 - CHED Services Contact Centre Services Agreement - December 2018 Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms or privacy concerns.

					SAPN may breach confidentiality clauses contained within commercial contracts. Contract may contain personal information.	in confidence contract terms.	
12.	18.17 -SAPN Powerline Services Agreement - December 2017 Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts. Contract may contain personal information.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms or privacy concerns.
13.	18.18 - Enerven and SAPN Services Agreement - December 2017 Confidential Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts. Contract may contain personal information.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms or privacy concerns.
14.	18.19 - Powerline Construction and Maintenance Services Procurement Recommendation - July 2017 Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms.
15.	18.20 - Powerline Construction and Maintenance Services Contract Addendum - December 2017 Whole document.	Contract terms and value.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts. SAPN may breach confidentiality clauses contained within commercial contracts.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms.
16.	1.2 - Shared Asset Model Complete model.	Model contains details of revenue streams, including assumptions for	Shared Assets	Market intelligence	In some cases, there is only one customer. Additionally, assumptions in relation to how revenue is identified include	Disclosure of this information could disadvantage ability to negotiate a competitive commercial outcome.	Information at a summary level, including revenue by service and total shared asset revenue is contained in Reset RIN Workbook 1 (template 7.4) and a summary is contained in Attachment 1. Confidentiality in the RIN template has only been

		future revenue streams			market sensitive overhead and margin assumptions.		claimed where revenue is specific to one customer. There is no public benefit in providing details of individual revenue streams. Availability of commercially sensitive information could reduce shared asset unregulated revenue and the amount deducted from the Annual Revenue Requirement leading to increased costs for customers.
17.	18.23 – SAPN and Enerven Corporate Services Agreement - December 2017 Confidential Whole document.	Contract terms.	Capex Opex (Related party)	Market sensitive cost inputs Market intelligence Strategic information Personal information	Disclosure may prejudice future contract negotiations. Disclosure may provide information to potential suppliers or competitors that would otherwise be confidential. SAPN may breach confidentiality clauses contained within commercial contracts. Contract may contain personal information.	The disclosure of information may impact the ability of SAPN to commercially negotiate future contracts and may breach commercial in confidence contract terms.	There is no public benefit in disclosing this information. It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes. Further, it is not in the public interest for SAPN to breach contract terms or privacy concerns.
18.	SAPN - 5.28 - Low Reliability Feeder Regulatory Model - December 2018 - Confidential.xlsx Whole workbook	Unit costs	Capex	Market sensitive cost inputs	Information will advantage our contractors given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
19.	SAPN - 5.29 - Hardening the Network Regulatory Model - January 2019 - Confidential.xlsx Whole workbook	Unit costs	Capex	Market sensitive cost inputs	Information will advantage our contractors given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
20.	5.14 - Bushfire mitigation program CBA Methodology Page 24, Figures 4 & 5	Information relating to safety/risks of specific geographical locations	Capex	Personal information Information affecting security of the network	Details can reasonably be ascertained from the information which raises personal privacy and sensitivity considerations.	Information relating to safety/risks of specific geographical locations, which may result in identification of persons' properties.	It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes, privacy concerns and the ability for the safety and security of the network and the public to be compromised.
21.	5.14 - Bushfire mitigation program CBA Methodology Pg 47, Figures 16, Pg 49, Figures 18 and paragraph 1...and Page 50 table 11and selected text	Valuation of land and/or costs	Capex	Strategic information	Information that may lead to land and easement value.	Information may adversely impact SAPN's ability to negotiate fair market prices for any future land and/or easement acquisitions.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
22.	5.14 - Bushfire mitigation program CBA Methodology Page 52-64 and 67, Figures 19-30 & Tables 12-18	Information relating to safety/risks	Capex	Personal information Information affecting security of the network	Can reasonably be ascertained from the information which raises personal privacy and/or sensitivity considerations.	Information relating to safety/risks of specific geographical locations, which may result in identification of persons' properties.	It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes and the ability for the safety and security of the network and the public to be compromised.
23.	SAPN – 5.15 – Bushfire CBA model 6 tabs (whole model)	Information relating to safety/risks of specific geographical locations	Capex	Personal information, Strategic information Information affecting security of the network	Can reasonably be ascertained from the information which raises personal privacy and sensitivity considerations.	Information relating to safety/risks of specific geographical locations, which may result in identification of persons' properties.	It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes and the ability for the safety and security of the network and the public to be compromised.
24.	5.33 Client Devices Business Case Paragraph 3, Pg 17 Paragraph 1, Pg 20 Paragraph 4, Pg 23	Strategic approach to costing	Capex	Market sensitive cost inputs	Information which would affect our ability to obtain competitive prices in future transactions, such a tender processes, will advantage our suppliers.	The business case contains technology usage, capacity information, specific vendor devices, along	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.

	Paragraph 9, Pg 29 Table 10 Pg 30 Table 12 Pg 32 Paragraph 1-4 Pg 32 Table 13, Pg 33 Paragraph 3-4, Pg 33 Table 14, Pg 34 Table 15, Pg 34 Paragraph 2, Pg 34 Table 16, Pg 41 Paragraph 3-4, Pg 41 Paragraph 1-3, Pg 42 Table 17 Pg, 43					with costs and our strategic approach.	
25.	5.35 Cyber Security Business Case Complete document	Details of SA Power Networks security	Capex, Security	Information affecting security of the Network	This business case sets out the current security posture and those strategies that are to be employed to address current or potential security risks.	If this information was to be disclosed then it would provide external parties increased knowledge of our information security systems which could then be exploited to impact the security of the network.	It is imperative for safety, customer service, reliability and reputational reasons that we keep our environment secure and therefore it is not in the public interest that this information be disclosed.
26.	5.37 GIS Consolidation Business Case Complete document	Strategic approach to major system replacement – details of potential vendors	Capex	Strategic information Market sensitive cost inputs	Information such as vendor prices, internal labour costs and information which would affect our ability to obtain competitive prices in future transactions, such as tender processes, will advantage our suppliers.	This business Case describes our two GIS products and our approach to consolidation to one, the disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
27.	5.38 Protection Settings Management (PSS) Business Case Complete document	Details of SA Power Networks network security	Capex, Security	Information affecting security of the Network	This business case sets out the current security approach to network security devices and settings and those strategies that are to be employed to address current or potential security risks.	If this information was disclosed, it could be exploited to impact the security of the network.	It is imperative for safety, customer service, reliability and reputational reasons that we keep our environment secure and therefore it is not in the public interest that this information be disclosed.
28.	5.40 Ring Fencing -IT Solution Business Case Table 1, Pg 12 Page 17 Paragraph 2, Pg 15 Table 5, Pg 19 Table 7, Pg 20 Page 21, table	Details of critical applications and Vendor costs	Capex	Strategic Information Market sensitive cost inputs Other – contains information on critical applications and vendor specific applications	Information such as vendor prices, internal labour costs and information which would affect our ability to obtain competitive prices in future transactions, such as tender processes, will advantage our suppliers.	This business case contains costs from a current vendor and shows a vendor we may use. Disclosure many impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
29.	5.36 SAP Upgrade Business Case Table 5, Pg. 27 Para 2-3, Pg. 29 Table 7, Pg. 34 Para 2-3, Pg. 35 Table 9, Pg. 40 Para 3-4, Pg. 41	Strategic approach major system upgrade – detailed cost estimates	Capex	Market sensitive cost inputs	Cost estimates for individual projects which will advantage our suppliers when we go to market for services to implement these projects.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.

30.	5.41 Worker Safety – Fatigue Risk Management Business Case Para 1, Pg 4 Para 2, Pg 6 Para 1, Pg 7 Para 3-6, Pg 8 Para 2, Pg 12 Table 1, Column, Pg 12 Table 3, PP 13-15 Appendix A, Pg. 22	Corporate Risk	Capex	Other	Reputational damage to the business and undue concern amongst the public who do not understand the high-risk nature of the industry and how the risk is managed could lead to approaches that are not prudent and efficient being adopted.	The assessment of our corporate risk related to safety and fatigued workers could result in reputational damage to the business and undue concern amongst the public who do not understand the high-risk nature of the industry and how the risk is managed.	If approaches that are not prudent and efficient are adopted, this would impact customer costs.
31.	RIN 11 - Non-network alternatives Complete document	Payments to Embedded Generator's	Opex	Market sensitive cost inputs	Disclosing this information will affect the competitive process in securing terms.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
32.	SAPN 14.4 - Fixed Fee and Quoted Services Pricing Model (Various cells across the model – where denotes material or contractor rates)	Contract rates subject to 'commercial in confidence' terms	Alternative Control Services	Market sensitive cost inputs	Disclosing this information will affect the competitive process in securing terms.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
33.	SAPN 14.6 - Public Lighting Pricing Model (Various cells across the model – where denotes material or contractor rates)	Contract rates subject to 'commercial in confidence' terms	Alternative Control Services	Market sensitive cost inputs	Disclosing this information will affect the competitive process in securing terms.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
RIN Workbooks							
34.	RIN 1 - Workbook 1 - Template 7.8 WACC Inputs	WACC and CAPM Parameters	Rate of Return	Market sensitive cost inputs	If the averaging periods were disclosed, it could compromise the business's ability to raise debt or hedge coverage within the averaging period on an efficient basis.	Other debt market participants would become aware that we had an incentive to try and obtain a large quantity of debt or hedge coverage in that limited period.	Disclosure of information may impact on business ability to negotiate fair market price for debt, impacting long term customer costs.
35.	RIN 1 - Workbook 1 – Template 7.4 Shared Assets Pole rental – Non NBN, cells L9:R9	Forecast revenue for shared assets for 2018-19 to 2024-25	Shared Assets	Market intelligence Strategic information	Contains forecasts of revenue uplift for Small Cell telecommunications roll-out.	Disclosure of this information could disadvantage ability to negotiate competitive commercial outcomes.	There is no public benefit in providing details of this revenue stream that could be identified by potential providers. Availability of commercially sensitive information could reduce shared asset unregulated revenue and the amount deducted from the Annual Revenue Requirement leading to increased costs for customers.
36.	RIN 1 - Workbook 1 – Template 7.4 Shared Assets Pole rental – NBN, cells L10:R10	Forecast revenue for shared assets for 2018-19 to 2024-25	Shared Assets	Strategic information Personal information	Contains forecasts of revenue uplift for single customer.	Disclosure of this information could disadvantage ability to negotiate competitive commercial outcomes.	There is no public benefit in providing details of this revenue stream that could be identified by single customer, which would also raise privacy concerns. Availability of commercially sensitive information could reduce shared asset unregulated revenue and the amount deducted from the Annual Revenue Requirement leading to increased costs for customers.

37.	RIN 1 - Workbook 1 – Template 5.4 MD & utilisation-Spatial Table 5.4.1 NON-COINCIDENT & COINCIDENT MAXIMUM DEMAND As marked "confidential" cells	Customer dedicated substations containing customer's maximum demands (both demand and timing)	Capex Opex	Personal information	Disclosing this information is disclosing customer-specific supply information raising privacy concerns and could be used by industry competitors.	This information could be market sensitive to the customers supplied from these substations.	Customer-specific information may be used by competitors of customers.
38.	RIN 1 - Workbook 3 – Template 2.12 Input Tables Tables 2.12.1 to 2.12.6 Rows 13, 90, 167, 244, 321, 398	Expenditure data relating to vegetation management undertaken by a single contractor	Opex	Market sensitive cost inputs	Disclosing these amounts will allow contract rates of sole supplier to be calculated. These rates were commercially negotiated in-confidence and are contained in a contract to which confidentiality provisions apply.	SA Power Networks is working to keep the existing contractor as well as encourage new contractors into the SA market. Disclosing this data could prejudice negotiations and future tender prices.	Not in public interest to compromise entry or price of more tree trimming contractors into SA market. This outweighs the public benefit (if any).
39.	RIN 1 - Workbook 3 – Template 2.12 Input Tables Tables 2.12.5 to 2.12.6, Colum M (2017/18) Rows 321 to 391 and 398 to 468.	Related party contract expenditure and margin information	Capex Opex (Ringfencing - affiliate transactions)	Market sensitive cost inputs Market intelligence	The related party tables within the template show confidential information that relates to the types of services provided by related parties, including the associated costs and margins. Information reported primarily relates to works undertaken by a single affiliate contractor, Enerven.	Disclosure of this confidential information would affect our ability to obtain competitive prices in future transactions and tender processes; and it would provide an advantage to competitors in the market.	The risks that disclosure of this information may have on future contract negotiations and pricing outweighs the public benefit (if any).

Attachment 2 – Proportion of confidential material

Ref:	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
1.	Regulatory Proposal 2020-25 and Supporting Documents	593	5654	6247	9.5%	90.5%
2.	Regulatory Reset RIN Workbooks	4 tabs in each of the 7 data files	111	115 (89 tabs in 7 data files + Basis of Preparation + Audit reports)	3.5%	96.5%