



3 April 2023

# Attachment 2.3: Confidentiality claims

Ausgrid's 2024-29 Regulatory Proposal

REVISED

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# Purpose

The *National Electricity Rules (NER)*, Final Reset RIN<sup>1</sup> (**RIN**) and *National Electricity Law*<sup>2</sup> require Ausgrid to identify those parts of our Regulatory Proposal that contain confidential information and to prepare confidentiality claims in accordance with the AER's Confidentiality Guideline (**Confidentiality Guideline**).<sup>3</sup>

NER clause 6.8.2(c)(6) provides that a regulatory proposal must include an identification of any parts of the regulatory proposal the Distribution Network Service Provider claims to be confidential and wants suppressed from publication on that ground in accordance with the Confidentiality Guideline.

RIN clause 2.3.1 provides that:

*If Ausgrid makes a claim for confidentiality over any information provided in response to this notice Ausgrid must:*

*(a) comply with the requirements of AER's Confidentiality Guideline, as if it extended and applied to responses to this notice*

*(b) provide, in addition to a confidential version of any information, a version of the information that may be published by the AER, and*

*(c) highlight all information that is subject to a confidentiality claim, and if that information is being reported in a regulatory template it must be highlighted using the confidentiality macro in the regulatory template.*

The Confidentiality Guideline requires network service providers to submit a confidentiality template together with public and confidential versions of documents and a 'proportion of confidential material notice' setting out the proportion of material claimed to be confidential.<sup>4</sup>

The table at **Appendix A** sets out our confidentiality claims in our Regulatory Proposal and RIN response documents. All confidentiality claims have been made in accordance with the requirements of the Confidentiality Guideline (as required by RIN 2.3.1(a)).

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

Note: This document has been revised to reflect Confidentiality Claims for documents 5.11 – 5.11.o

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<sup>1</sup> Australian Energy Regulator, *Regulatory Information Notice under Division 4 Part 3 of the National Electricity (New South Wales) Law* (26 October 2022), cl 2.3.1.

<sup>2</sup> *National Electricity Law*, s 28OA.

<sup>3</sup> Australian Energy Regulator, [Confidentiality Guideline](#), August 2017.

<sup>4</sup> Australian Energy Regulator, [Confidentiality Guideline](#), August 2017, p 5.

**Appendix A: Confidentiality claims template**

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

|    | Title, page and paragraph number of document containing the confidential information   | Description of the confidential information                   | Topic the confidential information relates to | Confidentiality category                                 | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential  | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.   | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers)  | Pages containing confidential information / Total pages |
|----|--|---|---|--|--|--|--|---|
| 1. | <b>Attachment 3.5</b> - Independent report on Ausgrid's 2024-29 revenue proposal<br>Pages 142, 148   | Security information  | Capex   | Information affecting the security of the network        | Sensitive information about Ausgrid's current and future cyber security plans. If made public, this information will jeopardise security of Ausgrid's network.   | Provision of this information has the potential to compromise security.  | Disclosure would increase risk of Ausgrid being a target of a cyber security breach.   | 2 / 149   |
| 2. | <b>Attachment 4.2</b> - Averaging period for cost of equity and debt<br>Pages 3, 4   | Observation periods for setting the allowed return on capital | Rate of return                                | Market sensitive cost inputs                             | The information sets out the periods over which Ausgrid is likely to issue debt or enter into hedging transactions. If the information is made public, it would likely to lead to opportunistic behaviour that results in Ausgrid paying higher debt costs than would otherwise be the case. | If the information is made public, it would likely to lead to opportunistic behaviour that results in Ausgrid paying higher debt costs than would otherwise be the case. For example, 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.<br><br>Disclosure of information will impact on our ability to negotiate a fair market price for debt, impacting long term customer costs. | There is no public benefit from the averaging periods being made public. There is only a detriment as outlined in the previous two columns.  | 2 / 4   |
| 3. | <b>Attachment 5.3.c</b> - Master list of network SCS capital projects (PDF + excel versions)<br><br>'Master Network SCS Capex' worksheet   | Identification of customers                                   | Capex   | Personal information                                     | Individual customer names.   | Information directly identifies customers and their proposed activities.   | Disclosure would result in breach of privacy obligations.  | 1 / 2   |
| 4. | <b>Attachment 5.6.c</b> – Major projects – augex and connections<br>Pages 2, 4, 5, 7   | Identification of customer                                    | Capex   | Personal information                                     | Multiple references to a customer's name.  | Information directly identifies a customer and their proposed activities.  | Provision of this information would not be of any public benefit, and will breach privacy obligations.   | 4 / 12  |
| 5. | <b>Attachment 5.6.i</b> – Forecast new connections model – SCS customer contribution<br>Worksheets:<br><ul style="list-style-type: none"> <li>Major project</li> <li>FY23-24 Raw Data</li> <li>EASP L1 \$Other Split</li> <li>EASP L1 Volume</li> <li>Full Project Data</li> </ul> | Identification of customers<br><br>Unit rates                 | Capex   | Personal information<br><br>Market sensitive cost inputs | Multiple references to customer names.<br><br>Information will advantage our contractors given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.   | Information directly identifies a customer and their proposed activities.<br><br>Disclosure of information will impact on our ability to negotiate fair market prices, impacting long term customer costs.   | Disclosure would result in breach of privacy obligations. Provision of this information would not be of any public benefit.<br><br>Disclosure of unit costs would not result in any benefit that would outweigh the identified detriments caused by public disclosure of this information. | 5 / 20  |

|     | Title, page and paragraph number of document containing the confidential information   | Description of the confidential information | Topic the confidential information relates to | Confidentiality category                                   | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential        | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.   | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers)  | Pages containing confidential information / Total pages |
|-----|--|---|---|--|--|--|--|---|
| 6.  | <b>Attachment 5.6.j</b> – Forecast new connections model – SCS <ul style="list-style-type: none"> <li>PIP 12.8 Output</li> <li>WBS</li> <li>Order</li> <li>FY23 \$ Final</li> <li>FY24 \$ Final</li> <li>LV Unit Rate</li> </ul> | Identification of customers<br>Unit rates   | Capex   | Personal information<br>Market sensitive cost inputs       | Multiple references to customer names.<br>Information will advantage our contractors given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply. | Information directly identifies a customer and their proposed activities.<br>Disclosure of information will impact on our ability to negotiate fair market prices, impacting long term customer costs. | Disclosure would result in breach of privacy obligations. Provision of this information would not be of any public benefit.<br>Disclosure of unit costs would not result in any benefit that would outweigh the identified detriments caused by public disclosure of this information. | 6 / 17  |
| 7.  | <b>Attachment 5.8.c</b> – Control System Core Refresh program<br>Pages 4, 6, 7, 10, 11, 13   | Security information                        | Capex   | Information affecting the security of the network<br>Other | Sensitive security information relating to Ausgrid's network and operations.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.   | Provision of this information has the potential to compromise security.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.                              | Disclosure would increase risk of Ausgrid being a target of a cyber security breach.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.   | 6 / 34  |
| 8.  | <b>Attachment 5.8.d</b> – Operational technology program<br>Pages 5, 7, 10, 12, 13, 14, 16, 18, 19, 22, 23, 24, 25, 26, 27, 28, 29, 31, 32, 36, 37   | Security information                        | Capex   | Information affecting the security of the network<br>Other | Sensitive security information relating to Ausgrid's network and operations.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.   | Provision of this information has the potential to compromise security.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.                              | Disclosure would increase risk of Ausgrid being a target of a cyber security breach.   | 21 / 45   |
| 9.  | <b>Attachment 5.9</b> – Technology plan for 2024-29<br>Pages 17, 25  | Security information                        | Capex   | Information affecting the security of the network<br>Other | Sensitive security information relating to Ausgrid's network and operations.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.   | Provision of this information has the potential to compromise security.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.                              | Disclosure would result in Ausgrid being a target of a cyber security breach.  | 2 / 51  |
| 10. | <b>Attachment 5.9.b</b> – ERP upgrade program<br>Page 55   | Security information                        | Capex   | Information affecting the security of the network          | Sensitive security information relating to Ausgrid's network and operations.   | Provision of this information has the potential to compromise security.  | Disclosure would result in Ausgrid being a target of a cyber security breach.  | 1 / 59  |
| 11. | <b>Attachment 5.9.c</b> - Cyber security program<br>Page 5, 8, 11, 12, 13, 14, 20, 22, 26, 30, 34  | Security information                        | Capex   | Information affecting the security of the network<br>Other | Sensitive security information relating to Ausgrid's network and operations.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.   | Provision of this information has the potential to compromise security.<br>Ausgrid is prohibited from publicly disclosing the substance of this confidential information.                              | Disclosure would result in Ausgrid being a target of a cyber security breach.  | 11 / 50   |



|     | Title, page and paragraph number of document containing the confidential information  | Description of the confidential information              | Topic the confidential information relates to | Confidentiality category  | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential   | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.   | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers)          | Pages containing confidential information / Total pages  |
|-----|---|--|---|---|---|--|--|--|
| 12. | <b>Attachment 5.11</b> - Property plan 2024-2029<br>Pages 11, 15, 17  | Land and acquisition costs                               | Capex   | Market sensitive cost inputs<br><br>Information affecting the security of the network | References forecast land and acquisition costs, as well as annual expenditure associated with security surveillance. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.  | Information would affect the market rates of land, build costs and security surveillance contracts. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.   | No known public benefit of disclosing this information outweighs the identified detriments.  | 3 / 21   |
| 13. | <b>Attachment 5.11 to Attachment 5.11o</b><br>Temporary confidentiality claim until 1 May 2023.<br><br>At the expiry of this temporary claim, the confidentiality claims in rows 12 to 27 will still apply. | Strategic information about 2024-29 property strategy    | Non-network property investment               | Strategic information   | The information relates to the acquisition of land, where the release of the information may adversely impact our ability to proceed with a strategic plan.   | Our 2024-29 non-network property strategy will lead to lower bill outcomes and potentially better service levels. These benefits to customers may not be possible if our strategic plan is published prior to planned engagement activities with several key stakeholders.                                       | There is no public benefit from publishing the documents prior to 1 May 2023 as this will serve as an obstacle to implementing a strategic plan that will deliver significant benefits to customers. | 180 / 270<br><br>At the expiry of this temporary claim, the confidentiality claims in rows 12 to 28 will still apply |
| 14. | <b>Attachment 5.11.a</b> - Southern Region program feasibility study<br>Pages 4, 7, 8, 10, 13, 17, 26, 28, 29, 30, 31, 33   | Land and acquisition costs<br><br>Author contact details | Capex   | Market sensitive cost inputs<br><br>Personal information                              | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly. | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations. | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.   | 12 / 33  |
| 15. | <b>Attachment 5.11.b</b> - Newcastle Region program feasibility study<br>Pages 4, 7, 12, 15, 16, 20, 26, 28, 29, 30, 32   | Land and acquisition costs<br><br>Author contact details | Capex   | Market sensitive cost inputs<br><br>Personal information                              | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly. | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations. | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.   | 11 / 32  |
| 16. | <b>Attachment 5.11.c</b> – Engineering design and collaboration centre program feasibility study<br>Pages 3, 5, 9, 14, 16, 17, 18, 20   | Land and acquisition costs<br><br>Author contact details | Capex   | Market sensitive cost inputs<br><br>Personal information                              | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly. | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations. | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.   | 8 / 20   |

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|-----|--|---|---|--|--|--|---|---|
| 17. | <b>Attachment 5.11.d</b> - Security upgrade program feasibility study<br>Pages 5, 7                          | Information affecting the security of the network<br>Author contact details | Capex   | Market sensitive cost inputs<br>Personal information | This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly.   | Disclosure would result in higher security surveillance contract costs, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations.  | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.                                | 2 / 7   |
| 18. | <b>Attachment 5.11.e</b> - Sydney North program feasibility study<br>Pages 3, 5, 12, 14, 15, 16, 18          | Land and acquisition costs<br>Author contact details                        | Capex   | Market sensitive cost inputs<br>Personal information | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly.  | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations. | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.                                | 7 / 18  |
| 19. | <b>Attachment 5.11.f</b> – General remediation and modernisation program feasibility study<br>Pages 3, 7, 10 | Cost related information<br>Author contact details                          | Capex   | Market sensitive cost inputs<br>Personal information | References forecast cost information in relation to Ausgrid's General remediation and modernisation program. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly. | Information would affect the market rates of costs related to the Security Upgrade Program. Disclosure would result in higher acquisition costs, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations.               | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.                                | 3 / 10  |
| 20. | <b>Attachment 5.11.g</b> - Hunter Depot program feasibility study<br>Pages 3, 6, 10, 16, 18, 19, 20, 22      | Land and acquisition costs<br>Author contact details                        | Capex   | Market sensitive cost inputs<br>Personal information | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.<br><br>Contact details of the authors comprise personal information which would raise privacy considerations if disclosed publicly.  | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.<br><br>Public disclosure of author contact details would raise privacy considerations. | No known public benefit of disclosing this information outweighs the identified detriments.<br><br>Disclosure would result in breach of privacy obligations.                                | 8 / 22  |
| 21. | <b>Attachment 5.11.h</b> – Southern Region program feasibility model<br>Worksheets:<br>• Cashflow            | Land and acquisition costs  | Capex   | Market sensitive cost inputs                         | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.  | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.  | No known public benefit of disclosing this information outweighs the identified detriments.   | 3 / 7   |

|     | Title, page and paragraph number of document containing the confidential information   | Description of the confidential information | Topic the confidential information relates to | Confidentiality category     | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.  | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers) | Pages containing confidential information / Total pages |
|-----|--|---|---|------------------------------|---|---|---|---|
|     | <ul style="list-style-type: none"> <li>Capex table</li> <li>Major capital works</li> </ul>   |   |   |                              |   |   |   |   |
| 22. | <b>Attachment 5.11.i</b> – Newcastle Region program feasibility model<br><br>Worksheets: <ul style="list-style-type: none"> <li>Cashflow</li> <li>Capex table</li> <li>Major capital works</li> </ul>                            | Land and acquisition costs                  | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers. | No known public benefit of disclosing this information outweighs the identified detriments.   | 3 / 7   |
| 23. | <b>Attachment 5.11.j</b> - Engineering Design and Collaboration Centre program feasibility model<br><br>Worksheets: <ul style="list-style-type: none"> <li>Cashflow</li> <li>Capex table</li> <li>Major capital works</li> </ul> | Land and acquisition costs                  | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers. | No known public benefit of disclosing this information outweighs the identified detriments.   | 3 / 7   |
| 24. | <b>Attachment 5.11.k</b> - Sydney North program feasibility model<br><br>Worksheets: <ul style="list-style-type: none"> <li>Cashflow</li> <li>Capex table</li> <li>Major capital works</li> </ul>                                | Land and acquisition costs                  | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers. | No known public benefit of disclosing this information outweighs the identified detriments.   | 3 / 7   |
| 25. | <b>Attachment 5.11.l</b> - Hunter Depot program feasibility model<br><br>Worksheets: <ul style="list-style-type: none"> <li>Cashflow</li> <li>Capex table</li> <li>Major capital works</li> </ul>                                | Land and acquisition costs                  | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers. | No known public benefit of disclosing this information outweighs the identified detriments.   | 3 / 7   |
| 26. | <b>Attachment 5.11.m</b> - Southern Region program NPV model<br><br>Worksheets:  | Land and acquisition costs                  | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers. | No known public benefit of disclosing this information outweighs the identified detriments.   | 7 / 24  |

|     | Title, page and paragraph number of document containing the confidential information   | Description of the confidential information                      | Topic the confidential information relates to | Confidentiality category     | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.  | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers) | Pages containing confidential information / Total pages |
|-----|--|--|---|------------------------------|---|---|---|---|
|     | <ul style="list-style-type: none"> <li>PB_cost_A</li> <li>PB_Benefit_A</li> <li>PB_Input</li> <li>Input</li> <li>QuickCalc</li> <li>Output_tables</li> <li>Calcs</li> </ul>  |  |   |                              |   |   |   |   |
| 27. | <b>Attachment 5.11.n</b> - Newcastle Region program NPV model<br>Worksheets: <ul style="list-style-type: none"> <li>PB_cost_A</li> <li>PB_Benefit_A</li> <li>PB_Input</li> <li>Input</li> <li>QuickCalc</li> <li>Output_tables</li> <li>Calcs</li> </ul> | Land and acquisition costs                                       | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.   | No known public benefit of disclosing this information outweighs the identified detriments.   | 7 / 24  |
| 28. | <b>Attachment 5.11.o</b> - Sydney North program NPV model<br>Worksheets: <ul style="list-style-type: none"> <li>PB_cost_A</li> <li>PB_Benefit_A</li> <li>PB_Input</li> <li>Input</li> <li>QuickCalc</li> <li>Output_tables</li> <li>Calcs</li> </ul>     | Land and acquisition costs                                       | Capex   | Market sensitive cost inputs | References forecast land and acquisition costs. This information would adversely impact Ausgrid's ability to obtain a competitive price in future transactions if publicly disclosed.                               | Information would affect the market rates of land and build costs. Disclosure would result in higher acquisition costs for land and accommodation development, which will result in higher long-term costs for customers.   | No known public benefit of disclosing this information outweighs the identified detriments.   | 7 / 24  |
| 29. | <b>Attachment 6.1.b</b> - Step changes model<br>'Calc Insurance premiums' worksheet  | Insurance premium cost forecast and start, end and renewal dates | Opex  | Market sensitive cost inputs | Information is sensitive for insurance market negotiation/tender purposes. Public disclosure would potentially harm Ausgrid's commercial interests.   | Disclosing information would adversely impact on Ausgrid's ability to negotiate a fair and competitive price for insurance cover as insurers would use this information to their advantage and jeopardise the appropriate negotiating advantage Ausgrid has in relation | Higher insurance premiums (i.e. increased opex) are not in the public interest as they would add to the price of electricity for consumers.   | 1 / 18  |



|     | Title, page and paragraph number of document containing the confidential information   | Description of the confidential information  | Topic the confidential information relates to | Confidentiality category  | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential   | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.  | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers)  | Pages containing confidential information / Total pages |
|-----|--|--|---|---|---|---|--|---|
|     |  |  |   |   |   | to this information. This will result in higher long-term costs for customers.  |  |   |
| 30. | <b>Attachment 6.3</b> - Marsh insurance report<br><br>Pages <sup>5</sup> 1, 2, 3, 11, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25 | Details of insurance policies including limits purchase and deductibles<br><br>Names of insurers<br><br>Confidential details of Ausgrid's Distribution Network Lease<br><br>Details of cyber security insurance arrangements | Opex  | Market sensitive cost inputs<br><br>Strategic information<br><br>Other<br><br>Information affecting the security of the network | Information is sensitive for insurance market negotiation/tender purposes. Public disclosure would potentially harm Ausgrid's and third party commercial interests.<br><br>Ausgrid's is contractually prohibited from publicly disclosing confidential details of Ausgrid's Distribution Network Lease.<br><br>Details of Ausgrid's cyber security insurance arrangements are sensitive and would jeopardise the security of the network if disclosed publicly. | Disclosing details of Ausgrid's insurance policies would adversely impact Ausgrid's ability to negotiate a fair and competitive price for insurance cover as insurers would use this information to their advantage and jeopardise the appropriate negotiating advantage Ausgrid has in relation to this information. Disclosing limit information would also encourage additional claims (including size of claims), especially for general liability which would lead to increased insurance premiums and in turn increased costs for customers. This will result in higher long-term costs for customers.<br><br>Disclosing details of cyber security insurance information is highly sensitive and if disclosed would increase risk of cyber attack to Ausgrid's business and operations. | We are not aware of any public benefit in publicly disclosing this information that would outweigh the detriments. Higher insurance premiums (i.e. increased opex) are not in the public interest as they would add to the price of electricity for consumers in the long term.<br><br>No known benefit of disclosing cyber security insurance arrangements. | 14 / 43   |
| 31. | <b>Attachment 8.10</b> - Stand alone avoidable cost model<br><br>'Volume forecast' worksheet (B41 to C120)                   | National Metering Identifier (NMI) numbers, customer names and individually calculated prices  | Individually calculated customer prices       | Market sensitive cost inputs  | Information directly identifies customers, their NMI number and their forecast prices. Disclosure would provide competitors of the identified customers with a competitive advantage as cost inputs for energy intensive industries is commercially sensitive information.  | Breaching disclosure requirements, customer complaints, impact on the reputation of the business. The publication of the network tariffs for these customers will reveal commercially sensitive cost information to their competitors.  | It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain from increasing pricing transparency through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information.          | 1 / 17  |
| 32. | <b>Attachment 8.11</b> - Indicative pricing schedule – ACS<br><br>Pages 21, 22, 23, 24, 25                                   | Identification of customers and their forecast individual annual pre-2009 public lighting charges  | Public lighting                               | Personal information<br><br>Market sensitive cost inputs  | The information includes our customers' names along with their respective forecast annual charges for pre-2009 assets for each year of the 2024-29 period. This is confidential as it discloses specific customer billing information.  | Our customers' privacy would be breached if their annual pre-2009 public charges were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business.   | It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain from increasing pricing transparency through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information           | 5 / 25  |

<sup>5</sup> Page numbers cited for this document reflect the page numbers in its footer, not the pdf reader's page count.

|     | Title, page and paragraph number of document containing the confidential information  | Description of the confidential information   | Topic the confidential information relates to            | Confidentiality category      | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential  | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.  | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers)  | Pages containing confidential information / Total pages |
|-----|---|---|--|-------------------------------|--|---|--|---|
| 33. | <b>Attachment 8.15</b> - Indicative pricing schedule - DUOS<br>'Indicative prices' worksheet  | NMI numbers, customer names and individually calculated prices                                    | Individually calculated customer prices                  | Market sensitive cost inputs  | Information directly identifies customers, their NMI number and their forecast prices. Disclosure would provide the competitors of the identified customers with a competitive advantage as cost inputs for energy intensive industries is commercially sensitive information.                                 | Breaching disclosure requirements, customer complaints, impact on the reputation of the business.   | It is not in the long-term interest of customers for this information to be disclosed as it will lead to non-commercial outcomes. Any short-term economic gain from increasing pricing transparency through publication of this information is not outweighed by the identified detriment that would be caused from disclosure of this information | 1 / 2   |
| 34. | <b>Attachment 8.17</b> - Indicative pricing schedule – NUOS<br>'Indicative prices' worksheet  | NMI numbers, customer names and individually calculated prices                                    | Individually calculated customer prices.                 | Market sensitive cost inputs  | Information directly identifies customers, their NMI number and their forecast prices. Disclosure would provide the competitors of the identified customers with a competitive advantage as cost inputs for energy intensive industries is commercially sensitive information.                                 | Breaching disclosure requirements, customer complaints, impact on the reputation of the business.   | There is no identifiable public benefit from the customer data being made public that outweighs the identified detriment.  | 1 / 2   |
| 35. | <b>Attachment 9.1.a</b> - Public lighting - pre-2009 fixed charge model FY24-29<br>Worksheets:<br><ul style="list-style-type: none"> <li>Report - Customer Charges</li> <li>Calc - RAB 2025-29</li> <li>Calc - Customer Charges</li> <li>Input - Customer Inventory FY15</li> <li>Calc - Residual Values</li> </ul> | Identification of customers and their forecast individual annual pre-2009 public lighting charges | Capex<br>Annual pre-2009 public lighting capital charges | Personal information          | The output of this model is fixed a public lighting charge for each customer. This is confidential as it discloses how much each customer pays for this element of charges.  | Our customers' privacy would be breached if their annual pre-2009 public charges were disclosed without their consent. This would result in customer complaints and would negatively impact the reputation of the business. | There is no identifiable public benefit in disclosing this information that outweighs the identified detriment. The public version of the model has all customer names removed as well as consolidated annual charges at a customer level. Calculations at an asset group level remain intact.   | 5 / 10  |
| 36. | <b>Attachment 9.1.b</b> - Public lighting model FY24-29<br>Worksheets:<br><ul style="list-style-type: none"> <li>Unit costs</li> <li>I_CAPEX – Stock Costs</li> <li>I_CAPEX</li> </ul>  | Contract material prices  | Capex  | Market sensitive price inputs | Negotiated supplier material prices are included within the model. Prices are subject to commercial confidentiality terms.<br><br>All material prices for brackets/luminaires and smart controllers have been redacted, including calculations where both the material price and installation costs are shown. | Disclosure of material prices would breach confidentiality terms in agreements with suppliers and will affect Ausgrid's ability to obtain competitive market prices in future tendering processes.                          | There is no public benefit in releasing the proposed confidential material prices. It is more likely to result in a detriment to customers if this information is disclosed as it will reduce our ability to obtain competitive market prices for these materials in the future.   | 3 / 26  |

|     | Title, page and paragraph number of document containing the confidential information                    | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential                 | Specify reasons supporting how and why detriment would be caused from disclosing the confidential information. | Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers) | Pages containing confidential information / Total pages |
|-----|---|---|---|--------------------------|---|--|---|---|
|     |   |   |   |                          |   |  |   |   |
| 37. | RIN.10 - 2024-2029 - Reset RIN - workbook 1 - forecast data<br>'5.4 MD & utilisation-Spatial' worksheet | Details of customer-owned zone sub stations | Spatial maximum demand                        | Personal information     | Table 5.4.1 includes the identities and load information of 3 customer-owned zone substations. This information is confidential as it is about an individual customer and would raise privacy considerations if disclosed publicly. | The information directly identifies customers and their load information.                                      | There is no public benefit from the identities and load details of these customer-owned sub stations being made public that would outweigh the privacy considerations raised.               | 1 / 30  |

## Appendix B: Proportion of confidentiality material notice

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

| Submission Title   | Number of pages of submission that include information subject to a claim of confidentiality | Number of pages of submission that do not include information subject to a claim of confidentiality | Total number of pages of submission | Percentage of pages of submission that include information subject to a claim of confidentiality | Percentage of pages of submission that do not include information subject to a claim of confidentiality |
|--|--|---|-------------------------------------|--|---|
| <b>Ausgrid Regulatory Proposal for 1 July 2024 – 30 June 2029</b><br><i>(From 1 May 2023)</i>  | 183  | 6204  | 6387                                | 2.87%  | 97.13%  |
| <b>Ausgrid Regulatory Proposal for 1 July 2024 – 30 June 2029</b><br><i>(Until 1 May 2023)</i> | 363  | 6024  | 6387                                | 5.68%  | 94.32%  |

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