

Ergon Energy Demand Management Incentive Scheme Confidentiality Claim 2020-25

November 2020



1. Requirement

The Australian Energy Regulator (AER) requires that Ergon Energy prepares a separate confidentiality claim for each piece of information it claims to be confidential. This document provides the required confidentiality claims. In the required tabulated format, we provide:

- The document identification
- The page or paragraph numbers for the sections that are considered confidential
- A description of the confidential information
- The topic covered by the confidential information
- The category of the confidential information (security of the network, market sensitive cost inputs, market intelligence, strategic information, personal information, other) with supporting rationale
- The detriment caused by the publication of the confidential information, and
- The optional consideration of the trade-off between the identified detriment and the public benefit should the information be released.

This document also provides information on the proportion of confidential information as required by the AER's Confidentiality Guideline.

2. Confidential information

The following table provides the required information where Ergon Energy has claimed confidentiality over information.

Document containing confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Reasons supporting why the information falls within the specified confidentiality category	Reasons supporting how and why disclosure would cause detriment	Reasons supporting why detriment outweighs the public benefit in disclosure
Ergon Energy DMIS 2019-20 Annual Report	Page 3; row actual expenditure incurred for the year and relevant net benefit	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	Page 3; row PV costs and net benefits	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.

Document containing confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Reasons supporting why the information falls within the specified confidentiality category	Reasons supporting how and why disclosure would cause detriment	Reasons supporting why detriment outweighs the public benefit in disclosure
Ergon Energy DMIS 2019-20 Annual Report	Summary of eligible projects Page 4; row PV costs and net benefits	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	Page 5; table Description of Responses Received cell cost	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	Page 5; table DM Cost and DM Delivered by Eligible Project cost, \$/KVA, PV of Costs, PV of benefits and Cumulative NPV	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	page 6; table Description of Responses Received row cost	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited

Document containing confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Reasons supporting why the information falls within the specified confidentiality category	Reasons supporting how and why disclosure would cause detriment	Reasons supporting why detriment outweighs the public benefit in disclosure
						demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	page 6; table DM Cost and DM Delivered by Eligible Project columns cost, \$/KVA, PV of Costs, PV of benefits and Cumulative NPV	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.

Document containing confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Reasons supporting why the information falls within the specified confidentiality category	Reasons supporting how and why disclosure would cause detriment	Reasons supporting why detriment outweighs the public benefit in disclosure
Ergon Energy DMIS 2019-20 Annual Report	page 8; table Description of Responses Received row submission and cost outlined as per EOI	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	Attachment 1; Confidential Copy of Contract for Committed Project - all paragraphs	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy DMIS 2019-20 Annual Report	Attachment 2; Confidential evaluation of relevant net benefit for committed project - all paragraphs	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs; Market intelligence	The information contains details relating to the cost of customer contracts. It may therefore advantage other providers of demand management services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for a demand management service and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for demand management contracts thus enabling market distortion. The information is covered under the Ergon Energy contract entered into with the demand management service provider, and its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for demand management services based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long-term interests of consumers. Substantial information about the justification for this investment is disclosed publicly and so redaction of this limited amount of confidential information will not impact the public's ability to understand the merits of the expenditure.
Ergon Energy 2019-20+ - FINAL AR RIN - Workbook 1 - annual reporting	Table 7.11.1 DMIA-DMIAM Ergon Energy 2019/20 Values for Operating expenditure, Relevant net benefit, Total	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs;	The material contains commercially sensitive information about Ergon Energy's payments (potential and actual) to demand management service providers	Operating expenditure external payments	Market sensitive cost inputs;

3. Proportion of confidential information

Submission	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
Ergon Energy DMIS 2019-20 Annual Report	5	5	8	62.5% Note: The pages that include information subject to a claim of confidentiality do provide information not subject to the claim.	37.5%
Ergon Energy 2019-20+ - FINAL AR RIN - Workbook 1 - annual reporting	1	15 Note: Each template within the AR RIN has been counted as a single sheet	16	6.7%	93.3%

Note: This notice is an approximate indication of the proportion and comparative proportion of material that is subject to a claim of confidentiality compared to that which is not.