

Introduction

As per Clause 6.8.2 (c)(6) of the National Electricity Rules and in accordance with the AER's *Confidentiality Guideline*¹, Evoenergy is providing the AER with a completed confidentiality template (Table 1) that identifies parts of the revised regulatory proposal, supporting documentation and data that Evoenergy claims to be confidential and wants suppressed from publication. The proportion of confidential material notice is provided in Table 2.

The AER Confidentiality Guideline allows the following categories of confidential information

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

Evoenergy has engaged with stakeholders about the types of information they need access to in order to understand and assess the substance of all issues arising from the information provided as part of the revised regulatory proposal. This resulted in minimal redactions and narrower confidential claims. As per Section 3.3 of the Confidentiality Guideline, Evoenergy has

- in confidential versions of documents, highlighted the confidential information in yellow shading.
- provided a public version of the documents which contain the confidential information. The public version has clearly identified the information that Evoenergy wishes to claim is confidential by blacking out that confidential information.
- submitted the confidentiality template in Microsoft Word format.
- for electronic documents, specified in the filename whether it is "public" or "confidential."

¹ AER, 2017, Confidentiality Guideline, August 2017.

Table 1. CONFIDENTIALITY TEMPLATE

Title, page and paragraph number of document containing the confidential information	Description of the confidential information.	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Identify the recognised confidentiality category that the confidential information falls within.	Provide a brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers).
Appendixes to attachments						
App 4.5 Gungahlin PJR - Appendix C (Atts 3 to 13) p22-44: attached connection applications / PNAs etc from customers.	Commercial agreements.	Capex.	Market intelligence.	This contains commercially sensitive information on developers and Evoenergy's operations.	Disclosure of this information may adversely influence outcomes in the competitive real estate and commercial development sector.	Consumers benefit from fair market outcomes. No material public benefit would be gained from the disclosure of this information.
App 4.6 Pialligo PJR - Appendix C (All Atts) p24-37: attached connection	Commercial agreements.	Capex.	Market intelligence.	This contains commercially sensitive information on developers and	Disclosure of this information may adversely influence	Consumers benefit from fair market outcomes. No material public benefit would be gained from the

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applications / PNAs etc from customers.				Evoenergy's operations.	outcomes in the competitive real estate and commercial development sector.	disclosure of this information.
App 4.7 Canberra City North, Lyneham & Dickson PJR - Appendix C (All Atts) p23-59: attached connection applications / PNAs etc from customers.	Commercial agreements.	Capex.	Market intelligence.	This contains commercially sensitive information on developers and Evoenergy's operations.	Disclosure of this information may adversely influence outcomes in the competitive real estate and commercial development sector.	Consumers benefit from fair market outcomes. No material public benefit would be gained from the disclosure of this information.
App 4.8 Canberra CBD PJR - Appendix C (All Atts) p25-52:	Commercial agreements.	Capex.	Market intelligence.	This contains commercially sensitive information	Disclosure of this information may adversely	Consumers benefit from fair market outcomes. No material public benefit would

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attached connection applications / PNAs etc from customers.				on developers and Evoenergy's operations.	influence outcomes in the competitive real estate and commercial development sector.	be gained from the disclosure of this information.
App 4.9 Kingston PJR - Appendix C (Att 1-5 & 9) p26-36 & p40: attached connection applications / PNAs etc from customers.	Commercial agreements.	Capex.	Market intelligence.	This contains commercially sensitive information on developers and Evoenergy's operations.	Disclosure of this information may adversely influence outcomes in the competitive real estate and commercial development sector.	Consumers benefit from fair market outcomes. No material public benefit would be gained from the disclosure of this information.
App 4.10 Belconnen Town Centre PJR -	Commercial agreements.	Capex.	Market intelligence.	This contains commercially	Disclosure of this information may	Consumers benefit from fair market outcomes. No

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Appendix C (All Atts) p22-46: attached connection applications / PNAs etc from customers.				sensitive information on developers and Evoenergy's operations.	adversely influence outcomes in the competitive real estate and commercial development sector.	material public benefit would be gained from the disclosure of this information.
App 4.12 HV cables business case - partly confidential p8 Fig 2 (unit rates), p9 Table 2 & p10.	Commercial information.	Capex.	Market sensitive cost inputs.	This attachment contains the commercially sensitive information in relation to unit rates.	Disclosure of this information may adversely influence future negotiations in relation to cable replacement with other parties, including service providers.	Consumers benefit from Evoenergy negotiating competitive market labour rates to ensure efficient costs.

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App 4.13 HV cables modelling (ZIP FILE) - fully confidential.	Commercial information.	Capex.	Market sensitive cost inputs.	This attachment contains the commercially sensitive information in relation to unit rates.	Disclosure of this information may adversely influence future negotiations in relation to cable replacement with other parties, including service providers.	Consumers benefit from Evoenergy negotiating competitive market labour rates to ensure efficient costs.
App 4.15 Distribution substation monitoring NPV - fully confidential.	Details of unit rates and input costs.	Capex/opex.	Market sensitive cost inputs.	This contains market sensitive information and cost inputs that guide the way Evoenergy approaches the market when procuring goods and services.	Disclosure of this information may impact Evoenergy's ability to negotiate fair market prices for these products	No material public benefit would be gained from the disclosure of this information. Consumers benefit from Evoenergy's ability to obtain fair competitive prices to ensure efficient costs.

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					and services in the future.	
App 4.16 Chamber substation PJR - partly confidential p19 Appendix B substation numbers.	Details of sites proposed for SCADA augmentation.	Asset Details (Cyber Security Sensitive).	Information affecting the security of the network.	Information which, if made public, may jeopardise cyber security of the network and could risk operations. Disclosing site details would provide sensitive information to malicious actors.	Information which, if made public, may jeopardise security of the network or Evoenergy's ability to effectively operate its network.	No material public benefit would be gained from the disclosure of this information.
App 4.17 Chamber substation NPV - fully confidential.	Details of unit rates and input costs.	Capex/opex.	Market sensitive cost inputs.	This contains market sensitive information and cost inputs that guide the way Evoenergy approaches the	Disclosure of this information may impact Evoenergy's ability to negotiate fair	No material public benefit would be gained from the disclosure of this information. Consumers benefit from Evoenergy's ability to obtain fair

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				market when procuring goods and services.	market prices for these products and services in the future.	competitive prices to ensure efficient costs.
App 4.18 ADMS business case - partly confidential p18 Table 5, p20 Table 6, p21 Table 7, p35 Tables 8 & 9	The costs included in the Financial Summaries tables are confidential.	Asset management.	Market sensitive cost inputs.	The detailed cost included in the Financial Summaries are market sensitive cost inputs.	Unauthorised access to this information would allow a malicious person to make market sensitive cost inputs available for other competitors in the ADMS market.	There is no perceived benefit for the public in knowing the detailed cost of an ADMS upgrade.
App 4.19 Business Intelligence business case, p1	Private employee information.	Capex/opex	Personal information	This contains the name and signatures of specific Evoenergy employees involved	Disclosing the confidential information raises privacy considerations for	No material public benefit would be gained from the disclosure of this information.

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					Evoenergy employees	
App 4.20 ICT platforms business case, p1	Private employee information.	Capex/opex	Personal information	This contains the name and signatures of specific Evoenergy employees involved	Disclosing the confidential information raises privacy considerations for Evoenergy employees	No material public benefit would be gained from the disclosure of this information.
App 4.20 ICT platforms business case p2, p5, p8-9	Information relating to ICT Security. Current maturity and planned additional controls.	Capex/opex.	Information affecting the security of the network.	Information which, if made public, may jeopardise security of the network or Evoenergy's ability to effectively plan and operate its network.	Information which, if made public, may jeopardise security of the network or Evoenergy's ability to effectively plan	No material public benefit would be gained from the disclosure of this information.

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					and operate its network.	
App 4.21 Security upgrade PJR - fully confidential	Zone substation security measures, vulnerabilities and treatment recommendations.	Asset management.	Information affecting the security of the network.	The documents list security measures, vulnerabilities and treatment recommendations for Zone Substations which is security-in-confidence information.	Unauthorised access to this information would allow a malicious person to make plans for easier bypass of the security measures.	There is no perceived benefit for the public in knowing zone substation security measures, vulnerabilities and treatment recommendations.
App 4.22 Security upgrade calcs - fully confidential	Zone substation security measures, vulnerabilities and treatment recommendations.	Asset management.	Information affecting the security of the network	The documents list security measures, vulnerabilities and treatment recommendations for Zone Substations which is security-in-	Unauthorised access to this information would allow a malicious person to make plans for easier bypass of the	There is no perceived benefit for the public in knowing zone substation security measures, vulnerabilities and treatment recommendations.

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				confidence information.	security measures.	
App 4.23 Security management plan 18-19 - fully confidential	Zone substation security measures, vulnerabilities and treatment recommendations.	Asset management.	Information affecting the security of the network.	The documents list security measures, vulnerabilities and treatment recommendations for Zone Substations which is security-in-confidence information.	Unauthorised access to this information would allow a malicious person to make plans for easier bypass of the security measures.	There is no perceived benefit for the public in knowing zone substation security measures, vulnerabilities and treatment recommendations.
Models						
Capex model - fully confidential	Model outlining Evoenergy's capital expenditure.	Capex.	Market sensitive cost inputs.	Evoenergy tenders on a periodic basis for external capital works and maintenance work and the release of	Information contains details on the current suppliers and contracts. Disclosure of this	Consumers benefit from Evoenergy negotiating competitive market labour rates to ensure efficient costs.

<p>Title, page and paragraph number of document containing the confidential information</p>	<p>Description of the confidential information.</p>	<p>Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)</p>	<p>Identify the recognised confidentiality category that the confidential information falls within.</p>	<p>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.</p>	<p>Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.</p>	<p>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).</p>
				<p>this information will severely disadvantage Evoenergy in an open competitive market.</p>	<p>information may affect Evoenergy's ability to obtain competitive prices in the future.</p>	

Table 2. Proportion of confidential material

Submission Title	Number of pages of submission that include information subject to a claim of confidentiality	Number of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Cover letter	0	1	1	0%	100%
Revised regulatory proposal	0	118	118	0%	100%
Attachments to the revised regulatory proposal	0	137	137	0%	100%
Supporting appendixes to the revised regulatory proposal and attachments	285	746	1031	28%	72%
Models (number of) submitted	1	14	15	7%	93%
Total	286	1,016	1,302	22%	78%

