

Powercor Australia Ltd

2021-2026 Price Reset

Confidentiality Claim

1.1 Confidentiality template

Powercor sets out below the completed Confidentiality template in respect of this regulatory proposal in accordance with the AER's *Better Regulation Confidentiality Guideline* dated August 2017 (**Confidentiality Guideline**).

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 ¹ 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).
Attachments to the Regulatory Proposal and appendices						
PAL BUS 9.01 - Security of critical infrastructure - Jan2020 – Confidential (entire document)	Detailed description of regulatory obligations and the cost forecast approach	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of "protected information"	Disclosure of unauthorised information is a criminal offence under the FATA	The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
PAL ATT148 - FIRB - No objection letter - Apr2017 - Confidential (entire document)	Letter from FIRB providing no objection to acquisition	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of "protected information"	Disclosure of unauthorised information is a criminal offence under the FATA	The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal provides sufficient information for customers

¹ Refer to table below

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							to understand the reasons for proposed step change and magnitude of the total cost.
PAL ATT149 - FIRB - Work plan approval letter - May2018 - Confidential (entire document)	Letter from FIRB approving the work plan for transitioning to compliance with the conditions	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of “protected information”	Disclosure of unauthorised information is a criminal offence under the FATA		The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
PAL ATT147 - Compliance work plan - Nov2017 – Confidential (entire document)	Approved work plan for transitioning to compliance with conditions	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of “protected information”	Disclosure of unauthorised information is a criminal offence under the FATA		The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
PAL ATT145 - CGI - Quote for onshoring - Aug2019 - Confidential (entire document)	Pricing estimate for provision of IT services	Opex	Market sensitive cost inputs and market intelligence, and information affecting the security of the network	Includes market sensitive pricing estimates, as well as details of the proposed service that may identify areas that may be the target of network security breaches.	Disclosing price estimates would undermine the competitive tendering process. Major security risk of hacking and interference in IT systems and network control systems		The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.

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PAL ATT146 - DD - Quote for onshoring - Aug2019 - Confidential (entire document)	Pricing estimate for provision of IT services	Opex	Market sensitive cost inputs and market intelligence, and information affecting the security of the network	Includes market sensitive pricing estimates, as well as details of the proposed service that may identify areas that may be the target of network security breaches.	Disclosing price estimates would undermine the competitive tendering process. Major security risk of hacking and interference in IT systems and network control systems	The detriment to customers of undermining competitive tender processes and increasing network security risk outweighs the public benefit from disclosure of the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
PAL ATT047 - Cyber strategy review – Nov2019 - Public (entire document)	PwC review of our cyber security capabilities	IT capex	Information affecting the security of the network	Provides information which may identify areas that may be the target of network security breaches.	Major security risk of hacking and interference in IT systems and network control systems	Our cyber security business case provides sufficient information for customers to assess the reasonableness of our proposal. The detriment to customers from increasing the risk to the security of the network outweighs the public benefit of detailed information regarding our security capability.
PAL ATT051 - JLT - Invoice for insurance - Nov2019 – Confidential (entire document)	Actual insurance premiums and insurer	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing and insurance providers	Disclosing prices and insurance providers would undermine the competitive tendering process.	The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
PAL ATT126 - Cost sharing agreement - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination.

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					Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
PAL ATT127 - DRMF Constitution - Dec2004 – Confidential (entire document)	Contract between us and service provider	Reset RIN	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
PAL ATT128 - Network services agreement - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.

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						time.
PAL ATT129 - Resources Agreement 2017 (PAL to CHED) - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty’s contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
PAL ATT130 - Resources Agreement 2017 (PAL to PNS) - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty’s contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
PAL ATT131 - Corporate Services Agreement 2017 - Dec2019 –	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in

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Confidential (entire document)					services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
PAL ATT132 - Corporate Services Agreement 2017 signed - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
Models						
PAL MOD 9.01 - Step changes - Jan2020 – Confidential (cost build up)	Pricing estimates for IT service providers	Opex	Market sensitive cost inputs and market intelligence.	Includes market sensitive pricing estimates	Disclosing price estimates would undermine the competitive tendering process.	The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information. The public version of the model provides sufficient information for customers to understand the magnitude of the total cost.

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Reset RIN Regulatory templates						
PAL RIN001 – Workbook 1 – Reg determination – Jan2020 – Public	Related party transactions	2.11 Labour	Market sensitive cost inputs Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower/Powercor Australia	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.
PAL RIN001 – Workbook 1 – Reg determination – Jan2020 – Public	Zone substation maximum demand	Spatial maximum demand	Personal information	In Table 5.4.1 contains coincident and non-coincident max demands by zone substation. Powercor has 13 entries in this table for customer owned zone substations. Confidentiality is being claimed to protect specific information which could identify the customer and their load information. The table in the first column identifies the zone subs which are in the Cat RIN Table 5.4.1, which require confidentiality.	The information could be market sensitive to the customers who own the zone substations.	There is little public benefit to be obtained in releasing information on customer owned substations, and consequently any detriment is negligible
PAL RIN002 - Workbook 2 - New historical CAT - Jan2020 – Public	Related party transactions	2.11 Labour	Market sensitive cost inputs Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower/Powercor	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory

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				Australia	and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.
PAL RIN008 - Workbook 8 - Historical FY CAT - Jan2020 - Public	Related party transactions	2.11 Labour 2.12 Input tables	Market sensitive cost inputs Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower/Powercor Australia	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.
PAL RIN008 - Workbook 8 - Historical FY CAT - Jan2020 - Public	Zone substation maximum demand	Spatial maximum demand	Personal information	In Table 5.4.1 contains coincident and non-coincident max demands by zone substation. Powercor has 13 entries in this table for customer owned zone substations. Confidentiality is being claimed to protect specific information which could identify the customer and their load information. The table in the first column identifies the zone subs which are in the Cat RIN Table 5.4.1,	The information could be market sensitive to the customers who own the zone substations.	There is little public benefit to be obtained in releasing information on customer owned substations, and consequently any detriment is negligible

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				which require confidentiality.		
PAL RIN009 - Workbook 9 - Historical FY Annual - Jan2020 - Public	Related party transactions	2.11 Labour 8.4 Opex	Market sensitive cost inputs Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower/Powercor Australia	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.

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Confidentiality category

A NSP must categorise the confidential information into one of the following confidentiality categories:

- *Information affecting the security of the network* - information which, if made public, may jeopardise 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, internal labour costs, and information which would affect the NSP's ability to obtain competitive prices 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 this 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 which the NSP claims is confidential but does not fit into one of the above categories.

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1.2 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
Overview paper	0	20	20	0%	100%
Regulatory proposal	0	179	179	0%	100%
Appendices	0	266	266	0%	100%
Business cases	17	782	799	2%	98%
Models	1	860	861	0%	100%
RIN documents	8	249	257	3%	97%
Attachments	472	5,829	6,301	7%	93%
TOTAL	496	8,185	8,683	6%	94%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in Powercor’s Regulatory Proposal and Reset RIN response that is subject to a claim of confidentiality compared to what is not.

Powercor consents to the AER disclosing all Powercor’s non-confidential information on the AER website.