

# Attachment A.1

## SAPN\_Revised Proposal Confidentiality Claim & AER Proportion of Confidential Material

03 July 2015



## **ATTACHMENT A.1 – CONFIDENTIALITY CLAIM & AER PROPORTION OF CONFIDENTIAL MATERIAL – Revised Regulatory Proposal 2015**

The information, agreements, reports and other documents referred to in this table (“Confidential Information”) is or contain confidential information of SA Power Networks and other persons or entities. The information and documents may also contain information to which persons have rights under privacy laws. SA Power Networks may consider individual requests to access specific parts of the Confidential Information. A request for access should be made on the application form located at [http://www.sapowernetworks.com.au/centric/corporate/corporate\\_information.jsp](http://www.sapowernetworks.com.au/centric/corporate/corporate_information.jsp) following the process described on the form.

SA Power Networks consents to the AER disclosing on the AER website all SA Power Networks’ Information contained in the SA Power Networks Revised Regulatory Proposal 2015-20 and SA Power Networks Revised Regulatory Proposal 2015-20 Attachments and Supporting Documentation that is not claimed as confidential within this claim.

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)
G.1b_SAPN_Kangaroo Island submarine cable_NPV – SAPN review	Excel model	Capex	Market Sensitive Costs Inputs	Commercially sensitive third party unit rates are specified within the model	Third party unit rates are provided in commercial confidence. Additionally, if this information was publicly disclosed it may significantly effect SAPN's ability to obtain competitive prices in the future	Customers are ultimately affected as non-competitive pricing will lead to higher prices to customers.
G.3_Risk Spatial_SA Power Networks Bushfire Risk Report	A report with additional information based on confidential Willis Maximum probable loss studies for various locations in South Australia	Capex	Other	Willis have claimed their maximum probable loss analysis as confidential. Disclosing the maximum probable loss analysis identifies specific areas of South Australia that are at greatest risk of loss should a fire event	Disclosure of such information is extremely sensitive	Could impact on insurance premiums and impact costs to customers.

				occur.		
G.10b_SAPN_DGA_ Revised ADMS and ZSS_Cost Benefit Analysis	Excel model  Cost sensitivity analysis for SCADA rollout	Capex	Market Sensitive Costs Inputs	Disclosing the sensitivity analysis supplier specific information raising privacy concerns and could be used by industry competitors.	Unit rates when modelling benefits, third parties have claimed commercially sensitive	Third party privacy would be infringed.
SAPN G.13_CONFID_KPMG IT Review Pages 8 & 9, Enterprise Information Security section; Table 5 – Enterprise Information Security.  Pages 33,34,35,36 – Enterprise Information Security Opex Step Change – Table 18, Table 19, and Table 20	Details of SA Power Networks security	Capex - Security	Information affecting the security of the network	This business case sets out the current security posture and those strategies that are to be employed to address current or potential security risks.	If this information was to be disclosed then it would provide external parties increased knowledge of our information security systems which could then be exploited to impact the security of the network.	It is imperative for safety, customer service, reliability and reputational reasons that we keep our environment secure and therefore it is not in the public interest that this information be disclosed.
G.18_SAPN_CONFID_IT Enterprise Information Security Business Case Addendum to Business Case: Information Security Foundation The entire Sections 2, 3, 4, 5 and Appendix A of the document.	Details of SA Power Networks security	Capex - Security	Information affecting the security of the network	This business case sets out the current security posture and those strategies that are to be employed to address current or potential security risks.	If this information was to be disclosed then it would provide external parties increased knowledge of our information security systems which could then be exploited to impact the security of the network.	It is imperative for safety, customer service, reliability and reputational reasons that we keep our environment secure and therefore it is not in the public interest that this information be disclosed.

<p>The following paragraphs of Section 1:</p> <p>Pg 2, paragraph 2, 4 Pg 3-8, Table 1 Pg 8, paragraph 1 Pg 9, Table 2 Pg 9, paragraph 1,3,4 Pg 10, Figure 1</p>						
<p>H.5_SAPN_CONFID_Opex Step Changes – No Access Poles</p> <p>Appendix B</p>	<p>Details of DNSP asset inspection practices of ‘no access poles’</p>	<p>Opex</p>	<p>Other</p>	<p>Disclosing third party information without permission</p>	<p>Not appropriate to publish these DNSP asset inspection practices</p>	<p>No public benefit would be gained from disclosing this information</p>
<p>H.9_SAPN_Radio Network Business Case</p> <p>Complete model</p>	<p>Mobile radio network options</p>	<p>Opex</p>	<p>Market Sensitive Costs Inputs</p>	<p>Disclosing specific information would limit SA Power Networks’ ability to gain fair market pricing for services and equipment if vendors or carriers were to understand our strategic direction.</p>	<p>Negotiations are currently underway with potential suppliers.</p>	<p>There is no public benefit if we release this information.</p>
<p>K.1_SAPN_CONFID_Shared Assets Model</p> <p>Complete model</p>	<p>Model contains details of revenue streams, including assumptions for future revenue streams</p>	<p>Shared Assets</p>	<p>Market Intelligence</p>	<p>In a number of cases there is only one customer. Additionally, assumptions in relation to how revenue is identified include overhead and margin assumptions.</p>	<p>Disclosure of this information would be likely to disadvantage SA Power Networks’ ability to negotiate a competitive commercial outcome.</p>	<p>Information at a summary level, including total revenue and type of service is contained in the Proposal and in Attachment 24.2 – Shared Asset Cost Reduction Method. We have not sought for any of that</p>

						<p>information to be made confidential.</p> <p>There is no public benefit in providing detail of the individual revenue streams. Lack of bargaining power would lead to increased costs for customers.</p>
<p>Q.1_SAPN_CONFID_Revised ACS opex-capex analysis</p> <p>Whole spreadsheet</p>	<p>File originally provided by AER on a confidential basis. It includes unit rates and other commercially sensitive information.</p>	ACS	<p>Market sensitive cost inputs; Market intelligence;</p> <p>Personal information</p>	<p>Sales and services information will affect our ability to obtain competitive prices; Detailed materials costs, overhead information and labour costs provides competitors with an unfair advantage as we move into a more competitive market environment; Information about specific customers has privacy considerations</p>	<p>Sales and services information will affect our ability to obtain competitive prices; Detailed materials costs, overhead information and labour costs provides competitors will an unfair advantage as we move into a more competitive market environment; Specific customers are identified</p>	<p>Only suppliers and competitors will enjoy a benefit.</p> <p>Suppliers may not offer their most efficient price if they have access to detailed sales and asset management information. Consumers will benefit from price competition when each market participant determines its prices independently, without access to detailed cost information of other service providers that could be used inappropriately.</p>
<p>Q.2_SAPN_CONFID_Overview ACS Modelling</p> <p>Appendix 1; and Appendix 2</p>	<p>Specific meter defect &amp; the manufacturer</p>	ACS	<p>Market intelligence;</p> <p>Personal information</p>	<p>Appendices identify a systemic defect with a certain meter type and the meter's manufacturer</p>	<p>Disclosing this information could be detrimental to one supplier's reputation/competitiveness and may breach SA Power Networks' contractual obligations</p>	<p>No consumer benefit arises from disclosing this information about the specific supplier and doing so could ultimately lessen competition in the meter supplier market which is not in the long-term interest of consumers</p>

<p>Q.3_SAPN_CONFID_Revised ACS capex forecast</p> <p>Whole spreadsheet</p> <p>Q.6_SAPN_CONFID_Revised ACS opex forecast</p> <p>Tabs: Volumes Workings Swiss Cheese model Change to secure</p> <p>Q.8_SAPN_CONFID_Revised ACS Metering Pricing Model</p> <p>Tabs: Assumptions, vol's Costs</p>	<p>Overhead costs, volumes forecasts and unit costs</p>	<p>ACS</p>	<p>Market sensitive cost inputs; Market intelligence</p>	<p>Detailed materials costs, overhead information and labour costs provides competitors with an unfair advantage as we move into a more competitive market environment</p>	<p>Detailed materials costs, overhead information and labour costs provides competitors will an unfair advantage as we move into a more competitive market environment.</p>	<p>Only suppliers and competitors will enjoy a benefit. Suppliers may not offer their most efficient price if they have access to detailed sales and asset management information. Consumers will benefit from price competition when each market participant determines its prices independently, without access to detailed cost information of other service providers that could be used inappropriately.</p>
<p>Q.5_SAPN_CONFID_CT testing schedule</p> <p>Whole spreadsheet</p>	<p>Overhead costs; internal labour costs; Specific customer information (NMIs)</p>	<p>ACS</p>	<p>Market sensitive cost inputs; Market intelligence Personal information</p>	<p>Sales and services information will affect our ability to obtain competitive prices; Detailed materials costs, overhead information and labour costs provides competitors with an unfair advantage as we move into a more competitive market environment; Information about specific customers has</p>	<p>Sales and services information will affect our ability to obtain competitive prices; Detailed materials costs, overhead information and labour costs provides competitors will an unfair advantage as we move into a more competitive market environment; Specific customer NMIs are identified</p>	<p>Only suppliers and competitors will enjoy a benefit. Suppliers may not offer their most efficient price if they have access to detailed internal cost information. Consumers will benefit from price competition when each market participant determines its prices independently, without access to detailed cost information of other service providers that could be used</p>

				privacy considerations		inappropriately. No consumer benefit arises from disclosing information about specific customers, only risks
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**AER 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
	281	3526	3807	7.4%	92.6%