

Supporting
document 18.2

Confidentiality Claim

2020-25 Revised
Regulatory Proposal
10 December 2019



Attachment 1 - Confidentiality template

Ref:	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. - Information affecting the security of the network - Market sensitive cost inputs - Market intelligence - Strategic information - Personal information - Other	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).
1.	Attachment 3 - Rate of Return Part pages 14-15	Advice of inflation	Rate of Return	Other	The information is owned by a third party	Potential breach of copyright	Disclosure of information and potential breach of copyright could lead to extensive legal costs for SAPN that would in turn be passed on to customers.
2.	5.6.1 - Northfield 66kV GIS Replacement model Whole model	Unit costs	Capex	Market sensitive cost inputs	Information could advantage our contractors given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
3.	5.6.2 - Vendor Report on Northfield 66kV GIS Replacement Whole document	Details owned by supplier	Capex	Strategic information	This is relating to ongoing investigations between SA Power Networks and the supplier	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
4.	5.7 - North Terrace Cable Ducts Replacement Business Case Whole document	Details owned by another business entity	Capex	Other – contains information on another business entity's confidential plans.	Confidential commercial information that belongs to another business entity.	Disclosure of this information would be detrimental to the business entity. It may provide market insight regarding their future upgrade.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
5.	5.7.1 - North Terrace Ducts model Whole model	Security of the network	Capex	Information affecting the security of the network	Identifies locations and faults on the network	If released, will affect the security of the network.	Disclosure of information could lead to security issues and breaches.
6.	5.8.1 - 11kV Paper Insulated Lead Cable Replacement model Whole model	Unit Costs Security of the network	Capex	Market sensitive cost inputs Information affecting the security of the network	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 identifies locations and faults on the network.	The disclosure of information may impact business ability to negotiate fair market price and will affect the security of the network if released.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs, and could lead to security issues.

7.	5.12 - BIS Oxford Economics - Gross Customer Connections Expenditure Forecasts to 2025-26 3.4.2 Major Projects List table	Details of SA Power Networks' potential major customer projects over the 2020-25 RCP	Capex, Connections	Personal information	This is sensitive information about SA Power Networks' customers.	This information could be detrimental to the customers detailed in this table. It may provide market insight to the competitors of these customers regarding their future projects / developments.	The public has access to the remainder of the report which details the major customer connections forecast over the 2020-25 RCP. There is no additional public benefit if we release this additional information, while customer information privacy could be infringed.
8.	5.16.1 - Low Reliability Feeder Regulatory model Whole workbook	Unit costs	Capex	Market sensitive cost inputs	Information will advantage our contractors/suppliers given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
9.	5.17.1 - Hardening the Network Regulatory model Whole workbook	Unit costs	Capex	Market sensitive cost inputs	Information will advantage our contractors/suppliers given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.
10.	5.19 - Rural Feeder Protection Business Case Part/s of pages 6-13; 15,21,26-35	Feeders	Capex	Other	Reputational damage to the business and undue concern amongst the public who do not understand the high-risk nature of the industry and how the risk is managed could lead to approaches that are not prudent and efficient being adopted.	The assessment of our corporate risk related to feeder information could result in reputational damage to the business and undue concern amongst the public who do not understand the high-risk nature of the industry and how the risk is managed.	If approaches that are not prudent and efficient are adopted, this would impact customer costs.
11.	5.19.1 - Rural Feeder Protection model Whole model	Corporate risk Feeders	Capex	Other Information affecting the security of the network	Reputational damage to the business and undue concern amongst the public who do not understand the high-risk nature of the industry and how the risk is managed could lead to approaches that are not prudent and efficient being adopted.	The assessment of our corporate risk related to feeder information could result in reputational damage to the business and undue concern amongst the public who do not understand the high-risk nature of the industry and how the risk is managed.	If approaches that are not prudent and efficient are adopted, this would impact customer costs.
12.	5.20 Fleet Model 2020-2025 Whole model	Unit costs	Capex	Market sensitive cost inputs	Information will advantage our contractors given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs
13.	5.20.1 - 14m EWP NPV Analysis Whole workbook	Unit costs	Capex	Market sensitive cost inputs	Information will advantage our contractors/suppliers given unit rates are negotiated commercially in-confidence and are contained in a contract to which confidentiality provisions apply.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs
14.	5.22.1 - Angle Park North Building model Whole model	Intellectual property	Capex	Other	Contains SA Power Networks' intellectual property	The disclosure will allow other businesses to take advantage of proprietary information.	Intellectual property was developed in house and release of this information would commercially disadvantage the work we have undertaken to develop this.

15.	5.22.3 - Angle Park North Logistics Pavement model Whole model	Intellectual property	Capex	Other	Contains SA Power Networks' intellectual property	The disclosure will allow other businesses to take advantage of proprietary information.	Intellectual property was developed in house and release of this information would commercially disadvantage the work we have undertaken to develop this.
16.	5.23.1 - Marleston North model Whole model	Intellectual property	Capex	Other	Contains SA Power Networks' intellectual property	The disclosure will allow other businesses to take advantage of proprietary information.	Intellectual property was developed in house and release of this information would commercially disadvantage the work we have undertaken to develop this.
17.	5.24.1 - St Marys model Whole model	Intellectual property	Capex	Other	Contains SA Power Networks' intellectual property	The disclosure will allow other businesses to take advantage of proprietary information.	Intellectual property was developed in house and release of this information would commercially disadvantage the work we have undertaken to develop this.
18.	5.25.1 - Clare Building model Whole model	Intellectual property	Capex	Other	Contains SA Power Networks' intellectual property	The disclosure will allow other businesses to take advantage of proprietary information.	Intellectual property was developed in house and release of this information would commercially disadvantage the work we have undertaken to develop this.
19.	5.25.3 - Clare Pavement model Whole model	Intellectual property	Capex	Other	Contains SA Power Networks' intellectual property	The disclosure will allow other businesses to take advantage of proprietary information.	Intellectual property was developed in house and release of this information would commercially disadvantage the work we have undertaken to develop this.
20.	5.28 - KPMG - Deliverability Review P.16 Summary of SAPN Responses no. 1, 4 & 5. p.17 last paragraph p.18 dot point 2 p.26 SAP S/4 dot point	Details of conclusions of SAP Upgrade analysis	Capex	Market Intelligence Strategic single company information	See comments for SAP Upgrade Addendum	The disclosure of information may impact on multiple network businesses ability to negotiate competitive prices for services.	The disclosure of information may impact on multiple network businesses ability to negotiate competitive prices for services.
21.	5.29 SAP Upgrade Business Case Addendum All dollar figures including costs and benefits. P3 Para 6,7,8 P4 Dotpoints 1,2 P9 Para 9,10, footnote 9 P10 Whole page & footnotes 19 & 20 P11 para 1,2,3,4,8; all company names P12 whole page P13 whole page P15 whole page expect dotpoints 1.3.4.5 P16 para 1 P17 para 3 P19 all except para 1 P20 all except 4 th & last dot-points P21 Points 3 & 6 P22 dot point 4 P23 whole page P25 points 2,3,4,11,12 P26, point 1 P27 whole page P28 line 2 on the table P29 line 7 on the table P30 points 7,8,9,10,11,12	Strategic approach major system upgrade – detailed options, cost estimates and confidential vendor information	Capex	Strategic information Market sensitive cost inputs Market Intelligence Strategic single company information	<ul style="list-style-type: none"> Cost estimates for individual projects which will advantage our suppliers when we go to market for services to implement these projects. There is limited provision of services in Australia (ie. they need to comply with CIC requirements and be on-shored) and thus easily identifiable Information provided by supplier provides strategic insight into capability and would provide insight to SAP who is a competitor for these services 	The disclosure of information may impact on multiple network businesses ability to negotiate competitive prices for services.	The disclosure of information may impact on multiple network businesses ability to negotiate competitive prices for services.

	P31 points 7,8,9 P32 whole page P33 line 2 on table P34 line 7 on table P35 points 10,11,12,13 P36 points 1,2,8,9,10,11 P37 whole page P38 point 2 on table P39 point 7 on table P41 Point 2 P42 last line, second last para P45 whole page P46 whole page P47 whole page P48 whole page P49 whole page P50 whole page P51 whole page						
22.	5.30 - Utilities Cyber Maturity Uplift Business Case Whole business case	Details of current and future network cyber security status	Capex	Information affecting the security of the network	Provides information that could be used by external parties to gain an understanding of network cyber capabilities and vulnerabilities that could then be exploited	Vulnerabilities could then be exploited to attack the network.	Disclosure of information may lead to network cyber attacks
23.	5.30.1 - KPMG - Independent Review on the Cyber Maturity Uplift Business Case Whole document	Details of current and future network cyber security status	Capex	Information affecting the security of the network	Provides information that could be used by external parties to gain an understanding of network cyber capabilities and vulnerabilities	Vulnerabilities could then be exploited to attack the network	Disclosure of information may lead to network cyber attacks
24.	5.32 ADMS Business Case Vendor and value information on pages: 1-12; 14-16	Details of critical applications and vendor costs	Capex	Information affecting the security of the network Market sensitive cost inputs	This includes software and system information used for our critical asset. Information such as vendor prices and cost estimates would affect our ability to obtain competitive prices and advantage our suppliers.	If this information was disclosed, it could be exploited to impact the security of the network. Disclosure may impact on business ability to negotiate fair market price	It is not in the interests of customers for this information to be disclosed as it may lead to non-commercial outcomes and the ability for the safety and security of the network and the public to be compromised.
25.	6.1 Critical Infrastructure Obligations Business Case: Addendum Paragraph 2 Pg 2 Table 1 Pg 2 Section 2.1 Paragraph 4 Section 2.4 Paragraph 1 Section 3.1 Paragraph 2 Section 3.2: Table 2, Paragraph 2, Table 3, Table 4 Section 3.2.1 Paragraphs 1,2,4,5. Section 3.2.2 Paragraph 1.	Strategic Approach – details of potential vendors	Opex, Security	Market sensitive cost inputs Market intelligence Personal information	Information such as supplier prices, internal labour costs and information which would affect our ability to obtain competitive prices in future transactions, such tender processes, will advantage our suppliers.	The business case contains information on operational and forecast costs along with current vendor information	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs.

26.	13.1 - Annexure A Insurance Information Entire document	Summary of insurance programs and procurement process	Pass through events	Market sensitive cost inputs Market intelligence	Details of our strategic approach for obtaining insurance including processes costs.	Increase costs in insurance	Information doesn't affect the costs to the public as it is used to justify change to the insurance cap event pass through
27.	14.3 - Ancillary Network Services Pricing Model See below	Contract rates subject to 'commercial in confidence' terms	Alternative Control Services	Market sensitive cost inputs	Disclosing this information will affect the competitive process in securing terms and pricing.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs
Results: F3-F53, I3-I53 Materials: C2-C10955 Contractors: D2-D11 Templates (BCS106-NDS457): C5-16, F5-16, D6-E7, G6-I7, F33-G43, F47-G50 Templates (NDS453-NDS456): F62-G62 (in addition to above)							
28.	14.4 - Public Lighting Pricing Model See below	Contract rates subject to 'commercial in confidence' terms	Alternative Control Services	Market sensitive cost inputs	Disclosing this information will affect the competitive process in securing terms and pricing.	The disclosure of information may impact on business ability to negotiate fair market price.	Disclosure of information may impact on business ability to negotiate fair market price for items, impacting customer costs
Cables replacement: H21-N21, H23-N23, H37, H39 Brackets Replacement: H27-N27, H29-N29, K52-M53, H57, H59 Bulk Lamp: H80-N96, G103-N118, J220-J236, L220-J236, H240 Bulk Lamp Unit Cost: H101-N117, G123-N139, J241-J257, L241-L257, H261 LED Conversions: G84-N85, G100-N101, G116-N117, G132-N133, G148-N149, G164-N165, G199-N200, G215-N216, G231-N232, G247-N248, G263-N264 SLO: G129-N130, G147-N148, G165-N166, G183-N184, G201-N202, G219-N220, G237-N238, G255-N256, G273-N274, G291-N292, G309-N310, G327-N328, G345-N346, G363-N364, G381-N382 SLO Unit Cost: G150-N151, G168-N169, G186-N187, G204-N205, G222-N223, G240-N241, G258-N259, G276-N277, G294-N295, G312-N313, G330-N331, G348-N349, G366-N367, G384-N385, G402-N403 SLO HID Opex: G48-N62, G68-N82 SLO LED Opex: J25-P27, G64, J64-P66, G72, J72-P74, G80, J80-P82 TFI Annuity Calcs: M8-N8, M10-N10, M15-M16, P15-P16 LED Annuity: D23-D26, H23-AB26, F43-G84, N43-N84, R43-R84, V43-V84, Z43-Z84, AH43-AI84 HID Annuity: D8-E22, I8-I22 Global Assumptions: G18, G20, H88-I94, H108-I109, J111, H116-I117, J120, H124-I125, J127, H132-I133, J135, H140-I141, J143 SLO Costs: K8-L24, N8-O24, H32-H48, I55-I71, K55-K71 AMP: H12-H15, H20-H22, H28-H30 LED – Price data: C6-C12, E6-E12, C16-C51, F16-F51, H16-H51, C58-C93							
29.	14.11 - Draft ACS Tariff Agreement Whole agreement	Draft information not yet finalised with public lighting customers	Alternative Control Services	Other	This document is in draft form and is not yet finalised with Public Lighting Customers (final due by start of new regulatory period).	The legal agreement is not finalised and therefore release of draft information (that could change) could cause confusion for customers.	The legal agreement is not finalised and therefore release of draft information (that could change) could cause confusion for customers.

Attachment 2 – Proportion of confidential material

Ref:	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
1.	Regulatory Revised Proposal 2020-25 and Supporting Documents	454	2500	2954	15.3	84.7