

IT Security IES: Confidentiality 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. View a description of the confidentiality categories (see page 9).	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).
TN-IT Security 1958-CONFIDENTIAL, P1, Lines 2 and 4 of 'Preferred Option' table	Cost estimates of preferred option are provided.	Capex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to budget figures.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on consumers.
TN-IT Security 1958-CONFIDENTIAL, P1, Lines 2, 3 and 4 of 'Sign-offs' table	Names of staff	Capex	Personal information	Individual contributors and approvers are identified by name.	Staff names should be protected from being associated with the document or the business.	There is no public benefit in identifying individuals who contributed to this process
TN-IT Security 1958-CONFIDENTIAL, P5, Chapter 3.3 'Risk Objectives'	Informs TasNetworks' risk appetite for specific categories.	Capex	Strategic information	A company's risk appetite to key variables is strategic information.	Risk appetites can be used to understand the company's approach to strategic decisions, thus potentially compromising its ability to negotiate.	If the ability of TasNetworks to negotiate competitive terms is compromised, this could have a negative impact on customers.
TN-IT Security 1958-CONFIDENTIAL, P10, Chapter 6.2 'Option estimates'	Cost estimates of options considered are provided.	Capex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to cost estimates.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a

					TasNetworks wants vendor costs to reflect the requirements.	negative impact on consumers.
TN-IT Security 1958-CONFIDENTIAL, P10, Chapter 6.2 'Option estimates'	Cost estimates of options considered are provided.	Opex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to cost estimates.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on consumers.
TN-IT Security 1958-CONFIDENTIAL, P11, Chapter 6.3 'Economic Analysis'	NPV analysis results for all options considered are provided.	Return on Investment	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to expected Net Present Value of options considered.	Current or competing vendors, by having a NPV estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor proposals to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor proposals is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on consumers.
TN-IT Security 1958-CONFIDENTIAL, P14, P14, Chapter 9 'Expected outcomes and benefits'	Values of tangible benefit.	Return on Investment	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to expected tangible benefits of the initiative.	Current or competing vendors may use the information to manipulate their estimates, giving them an advantage during RFQ/RFP. TasNetworks wants vendor proposals to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor proposals is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on consumers.
TN-IT Security 1958-CONFIDENTIAL, P15, 'Appendix A – NPV Analysis'	NPV analysis values breakdown for all options considered are provided.	Return on Investment	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to expected Net Present Value of options considered.	Current or competing vendors, by having a NPV estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants	If the ability of TasNetworks to obtain competitive vendor proposals is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a

					vendor proposals to reflect the requirements.	negative impact on consumers.
--	--	--	--	--	-----------------------------------------------	-------------------------------

MDMS Market Systems Replacement IES: Confidential Claim

<p>Title, page and paragraph number of document containing the confidential information</p> <p>DOCUMENT:</p> <p>TN_IES_CONFID_IT_Market_Systems_MDMS_Replacement_1897_V10 – RESUB</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>View a description of the confidentiality categories (see page 9).</p>	<p>Provide a brief explanation of why the confidential information falls into the selected category.</p> <p>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 customers).</p>
<p>Pages 3 and 4, section 1.</p>	<p>Cost estimates</p>	<p>Capex</p>	<p>Market sensitive cost inputs</p>	<p>Current or competing vendors may get a strategic advantage by having access to budget figures.</p>	<p>Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.</p>	<p>If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers.</p>
<p>Page 3, section 1, 3rd para</p>	<p>Comments relating to strategy</p>	<p>Strategy</p>	<p>Other</p>	<p>Publication likely to harm operations</p>	<p>May communicate information that could be used by vendors to gain an advantage.</p>	<p>If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.</p>
<p>Pages 4 and 5, section 1.1, parts of 3rd, 4th and 5th para's.</p>	<p>Comments relating to system capability</p>	<p>Strategy</p>	<p>Other</p>	<p>Publication likely to harm operations.</p>	<p>May communicate information that could be used by vendors to gain an advantage.</p>	<p>If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.</p>
<p>Page 7, section 2.5, 1st para.</p>	<p>Comments relating to strategy.</p>	<p>Strategy</p>	<p>Other</p>	<p>Publication likely to harm strategy implementation.</p>	<p>May communicate information that could be used by vendors to gain an advantage.</p>	<p>If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive</p>

						pricing for its services, which would have a negative impact on customers, including higher costs.
Page 9, section 3.2, 1 st para	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation.	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 10, section 3.4.1, 2 nd para.	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation.	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 11, section 3.4.2, chart	Information about strategy	Strategy	Other	Publication likely to harm strategy implementation	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 11, section 3.4.3, chart	Information about costs	Capex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to budget figures.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.

Page 12, section 3.4.4, NPV analysis	Information about costs	Capex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to NPV analysis.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs
Page 12, section 4.1, first row of table	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 20, section 6.2, diagram	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 21, section 6.2.1, table	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Pages 21-22, section 6.2.2, costs	Information about costs	Capex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to budget figures.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component,	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive

					giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.	pricing for its services, which would have a negative impact on customers, including higher costs.
Page 24, section 6.3, para's 2, 3, 5 & diagram	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Pages 24-25, section 6.3.1, table	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation	May communicate information that could be used by vendors to gain an advantage.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 25, section 6.3.2, costs	Information about costs	Capex	Market sensitive cost inputs	Current or competing vendors may get a strategic advantage by having access to budget figures.	Current or competing vendors, by having a cost estimate, may be able to re-engineer an order of magnitude estimate for the vendor component, giving them an advantage during RFQ/RFP. TasNetworks wants vendor costs to reflect the requirements.	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.
Page 25, section 6.3.3, risks	Comments relating to strategy	Strategy	Other	Publication likely to harm strategy implementation.	May communicate information that could be used by vendors to gain an advantage	If the ability of TasNetworks to obtain competitive vendor costs is compromised, it could impact on its capability to provide competitive pricing for its services, which would have a negative impact on customers, including higher costs.

Tariff Structure Statement: Confidential 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. View a description of the confidentiality categories (see page 9).	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).
Table 3 Tariffs - charging components, p18	<p>Table 3 in the Tariff Structure Statement sets out the combinations of charging components that make up each network tariff to be offered by TasNetworks during the 2019-24 regulatory period. It includes the network charging parameters applying to a small number of large, commercial customers who are charged for their use of the network through Individually Calculated Tariffs (ITC).</p> <p>ITCs are used because the complexity of these customers' connection arrangements makes it more cost reflective for them to be assigned to individually calculated network tariffs than the highly averaged published tariffs applying to more homogenous</p>	Indicative network pricing applying to ITC customers for the provision of standard control services.	Other	<p>The delivered cost of energy, including network charges, represents a significant, market sensitive cost input for ITC customers.</p> <p>The small number of customers involved makes them readily identifiable, potentially providing their competitors with information about one of their main cost inputs, information which would not otherwise be available to them.</p>	<p>Given that the identity of ITC customers would be able to be ascertained from the information published in Table 3 and the Indicative Pricing tables in Appendix B, the public disclosure of market intelligence of this nature has the potential to impact on those businesses' ability to achieve fair market prices for their goods and services in a competitive market.</p> <p>Individually calculated customer network charges are determined by modelling the connection point requirements of a specific customer at the request of the customer or their agents, and are agreed to between TasNetworks and the customer on a commercial-in-confidence basis. The terms of</p>	<p>There is no value to the wider customer base or general public in having access to details of the charging components which make up ITC network tariffs, because the characteristics of TasNetworks' other tariff classes are so unlike those of TasNetworks' ITC customers that any comparison of the network charges applying to ITC customers and the charges applying to other tariff classes would be meaningless, particularly in the absence of contextual information about the demands that ITC customers make on the network.</p> <p>In addition to exposing the businesses in question to competitive disadvantage, publishing the makeup of each ITC network tariff would also</p>

	<p>tariff classes, such as residential customers.</p> <p>As a result, there are differences between ITC customers not only in terms of the network prices they are charged, but also the parameters which make up the network tariffs they are assigned to.</p>				<p>TasNetworks' commercial undertakings with ITC customers, which TasNetworks and its ITC customers have agreed to in good faith, should be allowed to take precedence over the publication of ITC network tariff parameters. The non-disclosure of ITC tariff structures is also consistent with the AER's intent of giving protection to genuinely confidential information.</p>	<p>put at risk TasNetworks' ability to derive ITC prices using the consistent application of the methodology explained in TasNetworks' TSS, with ITC customers potentially seeking to negotiate network pricing outcomes that reflect the prices paid by other ITC customers rather than their own connection arrangements.</p>
<p><i>Appendix B: Indicative Prices for 2019 – 2024:</i></p> <ul style="list-style-type: none"> • Table B1: Indicative Prices (2019-20) Network Use of System (NUoS) – Standard Control Services, p50 • Table B2: Indicative Prices (2019-20) Distribution Use of System (DUoS) – Standard Control Services, p52 • Table B3: Indicative Prices (2019-20) Transmission Use of System (TUoS) – Standard Control Services, p54 • Table B4: Indicative Prices (2020-21) Network Use of System (NUoS) – Standard Control Services, p56 • Table B5: Indicative Prices (2020-21) Distribution Use of System (DUoS) – Standard Control Services, p58 	<p>Tables B1 – B15 in Appendix B to the Tariff Structure Statement set out the indicative prices for standard control services (DUoS, TUoS and NUoS) which are expected to apply in the forthcoming regulatory control period. This includes the charges which are expected to apply to a small number of large commercial and industrial energy users, for whom the delivered cost of energy represents a significant cost input.</p> <p>Individual Tariff Calculation (ITC) is applied to customers whose circumstances are such that they do not conform to a specific tariff class, meaning that the application of averaged shared network charges or postage stamp pricing would not be cost reflective and/or potentially distortionary</p>	<p>Indicative network pricing (standard control services) applying to ITC customers</p>	<p>Other</p>	<p>If a TasNetworks' document submitted to the AER contained commercially sensitive cost-related information, the disclosure of which would affect the business' ability to compete for non-regulated or contestable services, or impact on the businesses' ability to obtain competitive prices from suppliers, then it could potentially seek to protect that information from publication as a Market sensitive cost input, Market Intelligence or Strategic information.</p> <p>While the confidentiality categories defined by the Australian Energy Regulator are focussed on the impact that the public disclosure of information provided to the AER by a network service provider in meeting its regulatory obligations might have on the NSP's business or the security of the network, there is no confidentiality category which</p>	<p>The delivered cost of energy, including network charges, represents a significant, market sensitive cost input for ITC customers. Given that the identity of ITC customers would be able to be ascertained from the information published in the Indicative Pricing tables, the public disclosure of market intelligence of this nature has the potential to impact on those businesses' ability to achieve fair market prices for their goods and services in a competitive market.</p> <p>Individually calculated customer network charges are determined by modelling the connection point requirements of a specific customer either at the request of the customer or their agents, and are agreed to between TasNetworks and the customer on a commercial-in-confidence</p>	<p>There is no value to the wider customer base or general public in having access to ITC network prices because the characteristics of TasNetworks' other tariff classes are so unlike those of TasNetworks' ITC customers that any comparison of the network charges applying to ITC customers and the charges applying to other tariff classes would be meaningless, particularly in the absence of contextual information about the demands that ITC customers make on the network.</p>

<ul style="list-style-type: none"> • Table B6: Indicative Prices (2020-21) Transmission Use of System (TUoS) – Standard Control Services, p60 • Table B7: Indicative Prices (2021-22) Network Use of System (NUoS) – Standard Control Services, p62 • Table B8: Indicative Prices (2021-22) Distribution Use of System (DUoS) – Standard Control Services, p64 • Table B9: Indicative Prices (2021-22) Transmission Use of System (TUoS) – Standard Control Services, p66 • Table B10: Indicative Prices (2022-23) Network Use of System (NUoS) – Standard Control Services, p68 • Table B11: Indicative Prices (2022-23) Distribution Use of System (DUoS) – Standard Control Services, p70 • Table B12: Indicative Prices (2022-23) Transmission Use of System (TUoS) – Standard Control Services, p72 • Table B13: Indicative Prices (2023-24) Network Use of System (NUoS) – Standard Control Services, p74 				<p>specifically caters for NSPs seeking to protect the commercial interests of their customers.</p> <p>Nonetheless, TasNetworks is of the view that for its ITC customers, details of the network tariffs applying to their businesses represent a, market sensitive cost input.</p>	<p>basis. TasNetworks contends that the terms of its commercial undertakings with ITC customers, which TasNetworks and its ITC customers have agreed to in good faith, should be allowed to take precedence over the publication of ITC network charges, and that the non-disclosure of ITC prices is consistent with the AER's intent of giving protection to only genuinely confidential information.</p>	
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

- Table B14: Indicative Prices (2023-24) Distribution Use of System (DUoS) – Standard Control Services, p76

- Table B15: Indicative Prices (2023-24) Transmission Use of System (TUoS) – Standard Control Services, p78