

Reset RIN Response – Confidentiality



2018/19 – 2022/23

Schedule 1: 26. Confidentiality

26.1 This clause applies to any information TransGrid provides:

(a) in response to Schedule 1;

(b) in a revenue proposal, proposed negotiating framework, proposed pricing methodology, proposed tariff structure statement, access arrangement proposal or access arrangement for the forthcoming regulatory control period (a Proposal)

(c) in a revision or amendment to a Proposal; and

(d) in a submission TransGrid makes regarding a Proposal or a revised or amended Proposal; (together, TransGrid’s Information).

26.2 If TransGrid wishes to make a claim for confidentiality over any of TransGrid’s Information, provide the details of that claim in accordance with the requirements of the AER’s Confidentiality guideline, as if it extended and applied to that claim for confidentiality.

26.3 Provide any details of a claim for confidentiality in response to clause 26.2 at the same time as making the claim for confidentiality.

A table is provided with the following headings

Location of confidential information : Title, page and paragraph number of document containing the confidential information	Description: Description of the confidential information.	Topic: Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Category: Identify the recognised confidentiality category that the confidential information falls within.	Explanation: 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.	Reasoning: Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Public Benefit: 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).
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Location of confidential information	Description	Topic	Category	Explanation	Reasoning	Public Benefit
<p>TransGrid-EY-TransGrid load databook-1016-CONFIDENTIAL</p> <p>Spreadsheet tab 'All projects', columns E ('name'), M (exact location') and P ('justification of ranking')</p>	<p>The spreadsheet identifies potential new large loads.</p> <p>The list includes new and expanded mines and industrial processes. It includes information on location, possible timing and (in some cases) site names. These are from an independent study and not all information is in the public domain.</p>	Capex	Market intelligence Other	<p>The information includes clear 'market intelligence' about load proponents' plans to develop new or expanded mining operations and open new industrial processes.</p> <p>The reason is that publishing information about these demand sites' plans may discourage them from having early discussions with TransGrid about possible connections. This is clearly not in the interests of efficient network planning.</p>	<p>This information is commercially sensitive to proponents. Disclosure of it to the potential competitors and/or opponents of these businesses is to their detriment. It will discourage connecting customers from having open discussions with TransGrid in the future reducing the efficiency and accuracy of demand forecasting and network planning.</p>	<p>It is in the long term interests of consumers that TransGrid has access to the latest information when conducting network planning. Large new connections can lead to costs which are recovered from all consumers. The earlier that TransGrid has information, the more likely a solution will be the most efficient.</p> <p>Site names are not essential to considering the 'probabilistic planning' approach and the outcome of it. The AER and its appointed reviewers will have access to the full information.</p>
<p>TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216-CONFIDENTIAL, Pages 7-8, Table 4, Page 10, Figure 3.</p>	Information on physical security controls of TransGrid's substations.	Physical security	Information affecting the security of the network	This information will disclose security controls implemented for TransGrid's physical security.	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with an unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
<p>TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216 -CONFIDENTIAL, Page 9, Figure 2, Page 24, Table 10</p>	Maintenance performed on TransGrid's security assets	Physical security	Information affecting the security of the network	This information will disclose the condition of TransGrid's security assets through inference.	Condition information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with an unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
<p>TransGrid-Substation Security Assets Renewal and</p>	Information on physical security controls	Physical security	Information affecting the security of the	This information will reveal details of TransGrid's security controls in place	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to	The consequences associated with any unauthorised access are very

Location of confidential information	Description	Topic	Category	Explanation	Reasoning	Public Benefit
Maintenance Strategy-1216-CONFIDENTIAL, Pages 10-15, Section 6.1, Table 3, Section 7.2, Figure 4, Figure 5, Section 7.2.1. Pages 25-26, Table 11, Figure 6, Table 12			network		safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	high in terms of human lives, supply reliability and cost impact to the community.
TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216 - CONFIDENTIAL, Pages 15-17, Section 7.2.2.1, Table 4	Details of Access Card and Intrusion Detection System	Physical security	Information affecting the security of the network	This will disclose information on one of the key security controls implemented.	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216 - CONFIDENTIAL, Pages 17-18, Section 7.2.2.2, Table 5	Details of CCTV System	Physical security	Information affecting the security of the network	This will disclose information on one of the key security controls implemented.	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216 - CONFIDENTIAL, Pages 18-19, Section 7.2.2.3, Table 6 and Page 19-20, Section 7.2.2.4,	Details of Security Fence and Topping	Physical security	Information affecting the security of the network	This will disclose information on one of the key security controls implemented.	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.

Location of confidential information	Description	Topic	Category	Explanation	Reasoning	Public Benefit
Table 7						
TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216 - CONFIDENTIAL, Pages 20-21, Section 7.2.2.5 and Page 21-22, Section 7.2.2.6, Table 8	Details of Restricted Locks and Keys and security Main Gate	Physical security	Information affecting the security of the network	This will disclose information on one of the key security controls implemented.	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid - Substation Security Assets Renewal and Maintenance Strategy-1216 - CONFIDENTIAL, Pages 22-23, Section 7.2.2.7, Table 9	Details of Movement Activated Lighting	Physical security	Information affecting the security of the network	This will disclose information on one of the key security controls implemented.	Information on TransGrid's security controls in place may encourage exploitation. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS 1398 CCTV System Renewal-0117 - CONFIDENTIAL, Pages 2-4, Page 6-7	Information on CCTV system components	Physical security	Information affecting the security of the network	This will disclose TransGrid's CCTV system.	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid – NOS 1398 CCTV System Renewal-0117- CONFIDENTIAL, Pages 2, Page 3-4, Pages 7-9, Table 7	Information on CCTV system components	Physical security	Information affecting the security of the network	This will disclose TransGrid's CCTV system.	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS	Information on Electric	Physical	Information	This will disclose details of	This information may encourage exploitation of	The consequences

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1451 Electric Fence Topping Replacement-0117 - CONFIDENTIAL, Pages 2-3, Page 5-7, Table 2	Fence Topping	security	affecting the security of the network	TransGrid's Electric Fence Topping.	this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS 1451 Electric Fence Topping Replacement-0117 - CONFIDENTIAL, Pages 2-3, Page 6-8, Table 8	Information on Electric Fence Topping	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's Electric Fence Topping.	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS 1452 Motion Detector Replacement-0117- CONFIDENTIAL, Pages 2-3, Page 5	Information on Motion Detectors	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's Intrusion Detection System	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-OER 1452 Motion Detector Replacement-0117- CONFIDENTIAL, Pages 2-3, Page 6-7, Table 7	Information on Motion Detectors	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's Intrusion Detection System	This information may encourage exploitation of this specific security control. Any success may result in unauthorised access which may lead to safety incidents such as, personal injury, death, asset incidents impacting network reliability and electricity market, and financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS 1455 Substation Lightning Replacement-0117- CONFIDENTIAL, Pages 2-3, 6, Page 7,	Information on substation lighting	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's substation lighting	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.

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Table 2					interest of the consumer.	
TransGrid-OER 1455 Substation Lightning Replacement-0117-CONFIDENTIAL, Pages 2-3, Page 7, Table 8	Information on substation lighting	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's substation lighting	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS 1995 Access Card and Intrusion Detection System Replacement-0117 - CONFIDENTIAL, Pages 2-3, 6-7	Information on Access Card system	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's Access card system	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-NOS 1595 Access Card and Intrusion Detection System Replacement-0117-CONFIDENTIAL, Pages 2-3, Pages 6-10	Information on Access card system	Physical security	Information affecting the security of the network	This will disclose details of TransGrid's Access card system	This information may encourage exploitation of this specific security control. This may result in unauthorised access which may lead to safety incidents such as personal injury, death or asset incidents impacting network reliability and electricity market, or financial loss from theft and vandalism. This does not serve the long term interest of the consumer.	The consequences associated with any unauthorised access are very high in terms of human lives, supply reliability and cost impact to the community.
TransGrid-Cutler Merz Risk Audit-1016 – CONFIDENTIAL, Page 8, Table 3	Names of TransGrid staff	Opex	Personal information	Reveals names of staff	May cause detriment to staff members by publishing their details, as it puts individuals at risk of inappropriate & unwanted contact and may also contravene the Privacy Act. This does not serve the long term interest of the consumer.	Provides no probative value to the report, and does not add to the long term interests of consumers.
TransGrid - Aurecon Risk audit – 0515-CONFIDENTIAL, Appendix C, pp.c1-4	Names of TransGrid staff	Opex	Personal information	Reveals names of staff	May cause detriment to staff members by publishing their details, as it puts individuals at risk of inappropriate & unwanted contact and may also contravene the Privacy Act. This does not serve the long term interest of the consumer.	Public release of this market sensitive information may damage the market and result in higher prices for customers.

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TransGrid-RIN Response Related Party PO-0616-CONFIDENTIAL, Page 1, 4	Names of Staff	Physical security	Personal information	Reveals names of staff	May cause detriment to staff members by publishing their details, as it puts individuals at risk of inappropriate & unwanted contact and may also contravene the Privacy Act. This does not serve the long term interest of the customer.	Public release of this market sensitive information may damage the market and result in higher prices for customers.
TransGrid-RIN Response Related Party PO-1116-CONFIDENTIAL, Page 1	Names of Staff	Physical security	Personal information	Reveals names of staff	May cause detriment to staff members by publishing their details, as it puts individuals at risk of inappropriate & unwanted contact and may also contravene the Privacy Act. This does not serve the long term interest of the customer.	Public release of this market sensitive information may damage the market and result in higher prices for customers.
TransGrid-RIN Response Related Party PR-0616-CONFIDENTIAL, Page 1	Names of Staff	Physical security	Personal information	Reveals names of staff	May cause detriment to staff members by publishing their details, as it puts individuals at risk of inappropriate & unwanted contact and may also contravene the Privacy Act. This does not serve the long term interest of the customer.	Public release of this market sensitive information may damage the market and result in higher prices for customers.
TransGrid - NOS 1529 Reinforcement of Northern Network Contingent Project - 0117 - CONFIDENTIAL, Pages 7-11	Potential generation injection points	Capex	Market intelligence	Reveals the location and timing of the potential new generation	The generation information is considered confidential since it was provided under clause 5.3 or clause 5.3A of the National Electricity Rules and Clause 5.3.8 classifies this as confidential information.	Public release of this market sensitive information may damage the market and result in higher prices for customers.
TransGrid - NOS 1528 Reinforcement of Southern Network Contingent Project - 0117 - CONFIDENTIAL, Pages 7-11	Potential generation injection points	Capex	Market intelligence	Reveals the location and timing of the potential new generation	The generation information is considered confidential since it was provided under clause 5.3 or clause 5.3A of the National Electricity Rules and Clause 5.3.8 classifies this as confidential information.	Public release of this market sensitive information may damage the market and result in higher prices for customers.
TransGrid - NOS 1746 Support South Western NSW for Renewables Contingent Project - 0117 - CONFIDENTIAL,	Potential wind and solar connections	Capex	Market intelligence	Reveals the potential capacity of the renewables generation in South western NSW .	The generation information is considered confidential since it was provided under clause 5.3 or clause 5.3A of the National Electricity Rules and Clause 5.3.8 classifies this as confidential information.	Public release of this market sensitive information may damage the market and result in higher prices for customers.

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Page 5						
TransGrid-KPMG-Appendix N 2016 Utilities Benchmarking-0117-PUBLIC, Pages 7-131	IT benchmarking of utilities	Opex	Other – KPMG commercially sensitive information	Reveals benchmark costs for IT utilities.	KPMG is claiming confidentially on the grounds of commercially sensitive information.	
TransGrid-Reset RIN Statutory Declaration-0117-CONFIDENTIAL	Address of TransGrid Officer	Physical security	Personal information	Reveals address of TransGrid Officer	Personal private information	

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
Revenue Submission 2018/19-2022/23 (see Table 1.4(d) in TransGrid-Reset RIN General-0117-PUBLIC for list of documents)	206	18,939	19,145	1.08%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in TransGrid-Revenue Proposal 18_19 to 22_23-0117-PUBLIC that is subject to a claim of confidentiality compared to that which is not.

Schedule 1: 27. Consent to disclose non-confidential information

27.1 Confirm, in writing, that TransGrid consents to the AER disclosing all other of TransGrid's Information not the subject of a claim for confidentiality, including on the AER website.

TransGrid consents to the AER disclosing all of the information, other than that identified as confidential, provided by TransGrid as part of the Reset RIN, including on the AER website.