

Appendix F: Confidentiality claim

Revised regulatory proposal for the
Evoenergy electricity distribution
determination 2024 to 2029

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Table Error! No text of specified style in document. Confidentiality claim

Title, page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category.	How and why disclosure of the confidential information would cause detriment	Why the identified detriment is not outweighed by the public benefit
Revised regulatory proposal cover letter, page 1	Staff contact details and signature.	Revised proposal cover letter.	Personal information.	This contains the names, contact information and signature of personnel.	This would raise privacy considerations for personnel therefore redacted as required by the AER.	AER requested confidentiality.
Attachment 1 Augmentation expenditure Pages 4, 39 (Table 11 row 1),42, 49 (Figure 23)	Forecast information provided to Evoenergy on a confidential basis.	Demand forecast.	Strategic information.	Contains confidential information from third parties provided on the condition that the information is not made public.	Disclosure would result in organisations refusing to trust Evoenergy with confidential again in the future. Poor forecast will lead to inefficient over and under investment.	There is no public benefit from disclosing this information.
Appendix 1.2 Advisian capital cost escalation review report	Proponent project details and project cost details.	Project cost estimates and market sensitive details of ongoing	Market sensitive cost inputs.	Contains confidential information relating to project costs and	Disclosure would reveal sensitive information regarding ongoing	Public benefit is maximised by Evoenergy's ability to attract

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<i>Fully confidential</i>		procurement process.		ongoing contract negotiations.	contract negotiation and affect the NSP's ability to obtain competitive prices in future infrastructure transactions.	competitive market offers for contracts.
Appendix 1.3 Demand forecast [zip file] (contains Appendices 1.3.1 to 1.3.5) <i>Fully confidential</i>	Forecast information provided to Evoenergy on a confidential basis and details on customer connections.	Demand forecast.	Strategic information / personal information.	Contains confidential information from third parties provided on the condition that the information is not made public.	Disclosure would result in organisations refusing to trust Evoenergy with confidential again in the future. Poor forecast will lead to inefficient over and under investment.	There is no public benefit from disclosing this information.
Appendix 1.4 Business Cases for Zone Substations and 11 kV Feeders [zip file] (contains Appendices 1.4.1 to 1.4.22) <i>Fully confidential</i>	Proponent project details / proposed feeder routes, zone substation location / unit rates and project cost details.	Block and section information, other identifying information / detail relevant to potential easement requirements / detailed project cost estimates such as labour and material costs.	Personal information / strategic information / market sensitive cost inputs.	Makes it possible to identify / or reasonably ascertain an individual / customer, raising privacy considerations. Adversely impacts network service provider's (NSP's) ability to negotiate	This would raise privacy considerations for project proponents. This could lead to inefficient NSP operation, which is detrimental to customers.	There is no public benefit in disclosing private project information at this level of detail. There is no public benefit in disclosing feeder routes or zone substation locations.

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				<p>fair market prices for any easements.</p> <p>Would affect the NSP's ability to obtain competitive prices in future infrastructure transactions.</p>		<p>There is no public benefit in disclosing detailed unit cost details.</p>
<p>Appendix 2.1 Secondary Systems Business Case</p> <p>Pages 7-8 (Table 2, sections in rows 2 and 3), 15, 17-19, 21-24, 31.</p>	<p>Information related to Evoenergy's Security of Critical Infrastructure (SOI) Act obligations.</p>	<p>Network security.</p>	<p>Information affecting the security of the network.</p>	<p>Includes information which, if made public, may compromise the security of the network and Evoenergy's ability to effectively plan and operate the network.</p>	<p>Identification of strategy – or known vulnerabilities – may undermine the security of Evoenergy's network.</p> <p>Disclosure of information affecting the security of electricity supply is not in the public interest, not consistent with the National Electricity Rules (the Rules), and may breach relevant legislation, including the SOI</p>	<p>There is no public benefit in disclosing this information.</p>

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					Act 2018 and the Privacy Act 1988.	
<p>Appendix 3.1 Frontier Economics AER benchmarking of DNSP operating expenditure report</p> <p>Page 20 (Figure 2 and paragraph 92).</p>	Payroll information.	Historical payroll tax.	Market sensitive cost inputs.	Internal labour costs and information that affects our ability to obtain competitive prices in future transactions and tender processes.	May lead to anti-competitive tender and price negotiation processes.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.
<p>Appendix 3.2 Smart Meter Step Change Business Case</p> <p>Pages 6 (Table 1), 12 (Table 3), 15 (Tables 4 and 5), 20 (Figure 1).</p>	Unit rates / labour and other cost inputs.	Estimates for work and software subject to tender processes.	Market sensitive cost inputs.	Information includes internal labour costs and information which may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes. Evoenergy will be required to go to market for procurement of assets, data, and software services, for which the pricing can be back calculated from the individual	May lead to anti-competitive tender processes. Identification of unit costs could reveal the thresholds that vendors could price in for assets.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.

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				investment and benefits numbers.		
Appendix 3.2.1 Smart Meter Step Change excel file <i>Fully confidential</i>	Unit rates / labour and other cost inputs.	Estimates for work subject to tender processes.	Market sensitive cost inputs.	Information includes internal labour costs and information which may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes. Evoenergy will be required to go to market for procurement of assets, data, and software services, for which the pricing can be back calculated from the individual investment and benefits numbers.	May lead to anti-competitive tender processes. Identification of unit costs could reveal the thresholds that vendors could price in for assets.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.

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<p>Appendix 3.3 SOCI Business Case</p> <p><i>Fully confidential</i></p>	Labour costs / cost inputs / information affecting the security of the network.	Estimates for work subject to tender processes / internal labour costs / network security.	Market sensitive cost inputs / information affecting the security of the network.	<p>Information such as supplier prices, internal labour costs, and information which would affect our ability to obtain competitive prices in future transactions, such as tender processes.</p> <p>Includes information which, if made public, may compromise the security of the network and our ability to effectively plan and operate the network.</p>	<p>May lead to anti-competitive tender processes.</p> <p>Identification of strategy may undermine the security of Evoenergy's network.</p> <p>Disclosure of information affecting the security of electricity supply is not in the public interest, not consistent with the Rules, and breaches the intent of relevant legislation, including the SOCI Act 2018 and the Privacy Act 1988.</p>	Evoenergy is not aware of any material public benefit in publicly disclosing this information.
<p>Appendix 3.3.1 SOCI Business Case excel file</p> <p><i>Fully confidential</i></p>	Labour costs / cost inputs / information affecting the	Estimates for work subject to tender processes / internal	Information affecting the security of the network / market	Information such as supplier prices, internal labour costs, and information which would affect our	May lead to anti-competitive tender processes.	Evoenergy is not aware of any material public benefit in publicly

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	security of the network.	labour costs / network security.	sensitive cost inputs.	<p>ability to obtain competitive prices in future transactions, such as tender processes.</p> <p>Includes information which, if made public, may compromise the security of the network and our ability to effectively plan and operate the network.</p>	<p>Identification of strategy may undermine the security of Evoenergy's network.</p> <p>Disclosure of information affecting the security of electricity supply is not in the public interest, not consistent with the NER, and breaches the intent of relevant legislation, including the Security of Critical Infrastructure Act 2018 and the Privacy Act 1988.</p>	disclosing this information.

Table 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 that include information subject to a claim of confidentiality	Percentage of pages submission that do not include information subject to a claim of confidentiality
Revised proposal cover letter	1	0	1	100%	0%
Revised regulatory proposal	0	51	51	0%	100%
Appendices to the revised regulatory proposal	0	85	85	0%	100%
Attachments to the revised regulatory proposal	3	192	195	2%	98%
Appendices to the attachments	88	416	504	17%	83%
Revised regulatory proposal models (number of)	0	17	17	0%	100%
Total*	91	761	852	11%	89%

**Total excludes the Cover Letter, Document Index, and this Confidentiality Claim.*

**Note: Models/Excel Files/Zip Files are counted as one page for this purpose.*