



Attachment 0.4

Confidentiality Response

30 November 2023

PowerWater

Confidentiality

The table below identifies confidential information in the documents and models that we have submitted to the Australian Energy Regulator (**AER**) with our revised regulatory proposal. These documents have been identified as confidential in our Document Register (provided at Attachment 0.3). We have completed the AER’s confidentiality template (Table 1) in accordance with the AER’s Confidentiality Guideline to explain the reasons why we have sought confidentiality in relation to each document or model.

Please also note

1. For documents, the page number references relate to the page number indicated at the footer of the document (typically bottom left-hand side), and not the page number indicated in the PDF version.
2. Where confidential information is contained in an excel workbook, we have treated one worksheet as one page for the purposes of the calculation provided in Table 2.

Table 1: Details of confidentiality claim

Title, page and paragraph number	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Confidentiality category explanation	Reasons for detriment	Public benefit test
PWC 0.5 - Revised Proposal Tables and Charts						
Worksheet: 'Input Capex_Projects' Cells: I100:Q101, I104:Q105, I107:Q107, I109:Q109, T100:AB101, T104:AB105,	Total capex estimates for 4 different projects	ICT Capex forecasts	Market sensitive cost inputs	This information contains cost estimates which are considered detrimental to future commercial tenders if released.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If Power and Water’s competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from

Title, page and paragraph number	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Confidentiality category explanation	Reasons for detriment	Public benefit test
T107:AB107 and T109:AB109.						Power and Water negotiating competitive market rates to ensure efficient costs.
PWC - 3.2 – RBC OT Capability Uplift						
Page 15, Section 3.3.2 Page 19-20, Section 3.4.5 Page 26, Section 4.2 Appendix B Page 44, Table B.1 and B.2	Capex and opex breakdowns for data improvement projects, base DMS and GIS	Capex and Opex Forecast	Market sensitive cost inputs	This information contains cost estimates which are considered detrimental to future commercial tenders if released.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If Power and Water's competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.
Page 29-30, Section 4.3.2	Cost information and assumptions	Capex and Opex Forecast	Market sensitive cost inputs	This information contains details on Power and Water's labour forecasts. These are market sensitive inputs on the basis that they may impact future	Disclosure of the information may result in delays in labour negotiations that could consequently impact the timeliness and costs of future capital and operating	The balance of public interest is against disclosure at this point. If delays in labour market negotiations occur, there is then the potential for disruptions in work activity that may lead to

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				labour negotiations.	programs. This could result in higher costs for customers or delays in required programs.	delays or higher costs in completing our activities. The consequential risk to customers is higher costs and/or delays in undertaking works necessary for maintaining the reliability of network services.
PWC - 3.4 - CBA OT Capability Uplift						
Worksheet: 'Scen' Cells: F69 to F79 & M69 to O79 Worksheet: 'Benefits analysis' Cells: D132 to D145	Cost information and assumptions	Capex and Opex Forecast	Market sensitive cost inputs	Individual Staff type costing information shouldn't be in public domain as could impact expectation of potential recruits (particularly if misinterpreted as salary rather than full costs of 1 FTE with overheads). Staff cost savings could be misinterpreted as staff reductions.	Could raise concern on cost or number of resources particularly if there is confusion between salary and FTE cost. May raise potential employees' expectations of pay making it harder to recruit at competitive rates	No public benefit in publishing costs and could raise concern on the cost of resources if the figures are not correctly interpreted.

Title, page and paragraph number	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Confidentiality category explanation	Reasons for detriment	Public benefit test
PWC - 3.5 - RBC Single Site Consolidation						
Page 4, Section 1.2.1, Table 1 Page 5, Section 1.3, Table 2 Page 5, Footer 3 Page 6, Section 1.3, Table 3 Page 14, Section 3.3.1, Table 8 Page 15, Section 3.4.1, Table 10 Page 17, Section 3.5.1, Table 12 Page 18, Section 3.6.1, Table 13 Page 19, Section 3.6.1, Table 14 Page 20-21, Section 3.7.1, Table 15 Page 21, Section 3.7.1 Page 24-26, Section 3.7.5, Tables 22 to 36 Page 25-26, Figures 8 to 20 Page 28, Section 3.7.6, Table 37 Page 28, Footnote	Cost information and assumptions	Capex and Opex Forecast cost	Market sensitive cost inputs	This information contains cost estimates which are considered detrimental to future commercial tenders if released.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If Power and Water's competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.

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Page 31, Section 4.8, Table 38 Page 35, Section B.2, Table 40 Page 37, Section B.3, Table 41						
PWC - 3.5 - RBC Single Site Consolidation						
Page 4, Section 1.2.1, Table 1 Page 5, Section 1.3, Table 2 Page 5, Footer 3 Page 6, Section 1.3, Table 3 Page 14, Section 3.3.1, Table 8 Page 15, Section 3.4.1, Table 10 Page 17, Section 3.5.1, Table 12 Page 18, Section 3.6.1, Table 13 Page 19, Section 3.6.1, Table 14 Page 20-21, Section 3.7.1, Table 15 Page 21, Section 3.7.1	Cost information and assumptions	Capex and Opex Forecast cost	Market sensitive cost inputs	This information contains cost estimates which are considered detrimental to future commercial tenders if released.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If Power and Water's competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.

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<p>Page 24-26, Section 3.7.5, Tables 22 to 36</p> <p>Page 25-26, Figures 8 to 20</p> <p>Page 28, Section 3.7.6, Table 37</p> <p>Page 28, Footnote</p> <p>Page 31, Section 4.8, Table 38</p> <p>Page 35, Section B.2, Table 40</p> <p>Page 37, Section B.3, Table 41</p>						
<p>Page 17, Section 3.6.1, Table 13</p> <p>Page 18-19, Section 3.6.1</p> <p>Page 35, Section B.2, Table 40</p>	Information about Power and Water's single site strategy	Strategic information	Market sensitive information	Sets out information that is not public and could impact Power and Water's future negotiations for this project	Making this information public could impact Power and Water's ability to negotiate efficient costs for this project	If Power and Water's competitive position is undermined, it may pay more for components of this project. This would adversely impact on its ability to efficiently deliver its services, which in not in the long term interests of consumers.
<p>Page 25, Section 3.7.5</p> <p>Page 34, Section B.1, Table 39</p> <p>Page 36, Section B.3, Table 41</p>	Information relevant to labour force forecasts	Capex and opex forecasts	Market Sensitive Information	This information contains details on Power and Water's labour forecasts. These are market sensitive inputs on	Disclosure of the information may result in delays in labour negotiations that could consequently impact the timeliness and	The balance of public interest is against disclosure at this point. If delays in labour market negotiations occur, there is then the potential for

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				the basis that they may impact future labour negotiations.	costs of future capital and operating programs. This could result in higher costs for customers or delays in required programs.	disruptions in work activity that may lead to delays or higher costs in completing our activities. The consequential risk to customers is higher costs and/or delays in undertaking works necessary for maintaining the reliability of network services.
PWC - 3.6 - Single Site Consolidation support letter (DIPL)						
Entire Document	Details strategic elements of the single site consolidation project which have not been made public	Strategic information	Strategic Information/Personal Information	Information provided to Power and Water on a confidential basis.	Information provided to Power and Water on a confidential basis.	Information provided to Power and Water on a confidential basis.
PWC - 3.7 - Single Site Consolidation support letter (DCDD)						
Entire Document	Details strategic elements of the single site consolidation project which have not been made public	Strategic information	Strategic Information/Personal Information	Information provided to Power and Water on a confidential basis.	Information provided to Power and Water on a confidential basis.	Information provided to Power and Water on a confidential basis.

Title, page and paragraph number	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Confidentiality category explanation	Reasons for detriment	Public benefit test
PWC - 3.8 - Cyber Security efficient costs						
Page 4, Section 2.3.1 Page 5, Section 2.3.2 Pages 11-12, Section 2.4.2, Table 2.2 Pages 13-16, Section 3.1, Table 3.2 Pages 16-17, Section 3.2, Table 3.3	Cost information	ICT capex and opex forecasts	Market sensitive cost inputs	This information contains the names of key partnerships and detailed project costings which if made public would be detrimental to future commercial tenders.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If our competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.
Pages 7-11, Section 2.4.1, Table 2.1	Details of Power and Water's cyber security proposals	ICT Capex	Information affecting the security of the network.	The information relates to network security obligations and funding to meet those obligations.	If information is disclosed relating to the nature and status of certain security obligations, this information could be used malicious actors seeking attack, interfere with or interrupt the security of the network.	It is against the public interest for Power and Water's network to be exposed to malicious actors. Whilst this information is relevant to the assessment of Power and Water's proposal it is not essential to enable stakeholders to participate in the assessment of Power and Water's proposal so any

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						public benefit in the disclosure would be outweighed by the public interest in protecting the network from potential malicious actors.
PWC - 3.9 - SCS Capex model						
Confidential cells: 270 Worksheet: 'Input Projects' Cells: J98:O99, J102:O103, J105:O105, and J107:O107. Worksheet: 'Calc Project Costs' Cells: G98:L99, G102:L103, G105:L105, G107:L107,	Total capex estimates for 4 different projects	ICT Capex forecasts	Market sensitive cost inputs	This information contains cost estimates which are considered detrimental to future commercial tenders if released. This information contains total cost estimates for four projects which are considered detrimental to future commercial tenders if released.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If Power and Water's competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.

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W98:AB99, W102:AB103, W105:AB105, W107:AB107, AM98:AR99, AM102:AR103, AM105:AR105, AM107:AR107, AU98:AZ99, AU102:AZ103, AU105:AZ105, AU107:AZ107, BC98:BH99, BC102: BH103, BC105:BH105, BC107:BH107, BS98:BX99, BS102: BX103, BS105:BX105, and BS107:BX107.						
PWC – 5.1 – Marsh insurance premium estimate						
Entire document	Insurance premium Estimate	Opex Forecasts	Market sensitive cost inputs	The report provides insurance estimates for our	If these market sensitive inputs are released prior to a	If our competitive position is undermined and we pay more for our

Title, page and paragraph number	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Confidentiality category explanation	Reasons for detriment	Public benefit test
				property, liability, Financial Risks and other ancillary lines about Power and Water assets.	competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	contracted services, this would adversely impact upon our ability to efficiently deliver our services which is not in the long-term interests of consumers.
PWC – 5.2 – Opex step change cloud migration						
Page 9, Section 2.4.1, Table 2.1 Pages 11-12, Section 3.1, Table 3.2 Page 12, Section 3.2, Table 3.3	Cost information	ICT capex and opex forecast	Market sensitive cost inputs	This information contains detailed project costings which if made public would be detrimental to future commercial tenders.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If our competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.
Page 4, Section 2.2.2, Figure 2.1	Details of Power and Water's ICT systems and architecture	Capex and opex forecast	Information affecting the security of the network.	This information contains details on Power and Water's ICT systems and	This information contains details on Power and Water's ICT systems, capabilities	If information is disclosed relating to the nature and design

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Page 5, Section 2.2.2, Figure 2.2 Page 7, Section 2.3.1, Figure 2.4 Page 8, Section 2.3.2, Figure 2.5 Page 12, Section 3.2, Table 3.3				capability. This information was provided to Power and Water on a confidential basis and/or contains confidential information following review or assessment of Power and Water's ICT systems and capability	and risks. This information could be used malicious actors seeking attack, interfere with or interrupt the security of the network.	of Power and Water's ICT architecture, this information could be used malicious actors seeking attack, interfere with or interrupt the security of the network.
PWC – 5.4 – Opex step changes model						
Entire workbook	Detailed cost build-ups	Opex forecast	Market sensitive cost inputs	This information contains cost estimates which are considered detrimental to future commercial tenders if released.	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	If Power and Water's competitive position is undermined and we pay more for our contracted services, this would adversely impact upon our ability to efficiently deliver the capital works program which is not in the long-term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.

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PWC – 6.1 – Nominated cost pass through event						
Entire document	Proposed nominated cost pass through event which may arise as a result of government reform of the NT Energy Market.	Proposed nominated cost pass through event	Strategic market reform information.	The NT government is currently considering reforms to the NT Electricity Market which may impact on Power and Water.	It would be detrimental for NT government decision making processes if the scope and subject matter of the proposed reforms were disclosed ahead of formal consideration and decision by the NT Government.	The detriment will arise if the disclosure is made ahead of the NT government making its decision. Once the NT Government has made a decision on the proposed reforms, those matters will become publicly known along with potential impacts for Power and Water. This is likely to occur ahead of the AER's final decision which will allow for the subject matter of the reforms and their impact on Power and Water to be publicly known and understood and the justification for the pass through event to be the subject of public scrutiny.
PWC – 7.4 – SCS Pricing model						

<p>Worksheet: 'Output_Pricing_Proposal'</p> <p>Cells: Tariff 5 Bill Impacts = 1,106 confidential cells</p> <ul style="list-style-type: none"> • Cells – H361 to J518 (474 cells) • Cells – L361 to L518 (158 cells) • Cells – T361 to U518 (316 cells) • Cells – W361 to W518 (158 cells) <p>Tariff 6 Bill Impacts (excluding previous Tariff 7 customers) = 343 confidential cells</p> <ul style="list-style-type: none"> • Cells – H527 to J575 (147 cells) • Cells – L527 to L575 (49 cells) • Cells – T527 to U575 (98 cells) • Cells – W527 to W575 (49 cells) <p>Tariff 6 Bill Impacts (including previous Tariff 7</p>	<p>Customer load profiles & calculations of individual bill impacts for major customers (approx. 214 NMI's)</p>	<p>Pricing</p>	<p>Personal information</p>	<p>The model contains information on the energy use, and indicative prices for large customers who may be identifiable based on the information provided in the model.</p> <p>This information is confidential to those individual customers.</p>	<p>Disclosure of this type of information could have an adverse impact on the commercial position of customers as third parties could use the information such as the customer's load profile for its own commercial advantage without the knowledge or consent of the customers who have not consented to the disclosure. The energy market rules are premised on customers have the right to access their own data and having control or influence of the public disclosure of that information. The general disclosure of this type of customer information would undermine that premise.</p>	<p>Whilst there is a general public interest in all material being considered by the AER being publicly available. There is no specific public interest in the load profiles and indicative prices of individual customers being publicly available. The general public interest is sufficiently met by the AER being able to assess and test this information and the more aggregated pricing and tariff information which is publicly available. Consequently, the potential detriment to customers of their specific information being disclosed outweighs the minimal if any public interest in this information being publicly available.</p>
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customers) = 434 confidential cells	<ul style="list-style-type: none"> • Cells – H583 to H644 (186 cells) • Cells – L583 to L644 (62 cells) • Cells – T583 to U644 (124 cells) • Cells – W583 to W644 (62 cells) 					
Tariff 6 Bill Impacts (including previous Tariff 7 customers) = 434 confidential cells	<ul style="list-style-type: none"> • Cells – H583 to J644 (186 cells) • Cells – L583 to L644 (62 cells) • Cells – T583 to U644 (124 cells) • Cells – W583 to W644 (62 cells) 					
Previous Tariff 7 Bill Impacts = 91 confidential cells						

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<ul style="list-style-type: none"> • Cells – H652 to J664 (39 cells) • Cells – L652 to L664 (13 cells) • Cells – T652 to U664 (26 cells) • Cells – W652 to W664 (13 cells) <p>All Major Customers (Tariffs 5 and 6) = 1,540 confidential cells</p> <ul style="list-style-type: none"> • Cells – H672 to J891 (660 cells) • Cells – L672 to L891 (220 cells) • Cells – T672 to U891 (440 cells) • Cells – W672 to W891 (220 cells) 						
PWC – 9.1 – ACS Fee-based and Quoted Services Model						
<p>Worksheet: 'Input Fee Based'</p> <p>Cells: K17:L18, O28:P29, O33:P34, O36:P36, X28:Z29, X36:Z36,</p>	External unit rates	Fee-based and quoted services tariffs	Market sensitive cost inputs	The ACS Fee Based and Quoted Services Model sets out the costs used to build up our	If these market sensitive inputs are released prior to a competitive tender, we may not obtain the	If our competitive position is undermined and we pay more for our contracted services, this would adversely impact

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AQ17:AT18, AQ28:AT29, AQ33:AT34, AQ36:AT36 Worksheet: 'Calc Fee Based' Cells: L17:L18, O28:O29, O33:O34, O36, S17:S18, S28:S29, S33:S34, S36, W28:Y29, W36:Y36, AQ17:AT18, AO28:AO29, AO36, AQ28:AT29, AQ33:AT34, AQ36:AT36				estimated cost of providing fee-based and quoted services for services and materials as delivered by external providers.	most cost-efficient quotes for our contracted services (as service providers will most likely quote close to our anticipated inputs).	upon our ability to efficiently deliver the capital works program which is not in the long term interests of consumers. Consumers benefit from Power and Water negotiating competitive market rates to ensure efficient costs.

Proportion of confidential information

Table 2: Proportion of confidential 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	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Power and Water Corporation Revised Regulatory Proposal for the 2024-2029 Regulatory Period	94	761	855	11%	89%