



Attachment 12.02

Confidentiality Claim 2025-30

2 December 2024



Part of Energy Queensland

OVERVIEW

Clause 6.8.2(c)(6) of the National Electricity Rules (NER) requires that Ergon Energy must identify the parts of its regulatory proposal that are confidential and should be suppressed from publication.

This document provides the relevant details of:

- each piece of information Ergon Energy claims is confidential (Section 1: Documentation and Section 2: Excel Models), and
- the proportion of Ergon Energy's regulatory proposal that includes confidential information (Section 3)

in accordance with the Australian Energy Regulator's *Distribution Confidentiality Guideline*.

1. Confidential information

Document containing the confidential information	Page and paragraph number	Description of the confidential information	Topic the confidential information relates to	Identify the recognised confidentiality category that the confidential information falls within	Provide a brief explanation of why the confidential information falls into the selected category	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	No of pages containing confidential information / total no. of pages
Section 5.5 – Repex								
Ergon - 5.5.11 - Business Case - GRID COMMS - Microwave Radio Edge Capricornia and Mackay Replacements - November 2024 - confidential	Page 4 section 3.2 table Page 5, dot point 5 Appendix 3, Page 14 Pages 16 to 73	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	61/73
Ergon - 5.5.12A - Business Case - GRID COMMS - SDH Replacement Edge - November 2024 - confidential	Page 5 section 3.1 table 1	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	1/15
Ergon - 5.5.12B - Business Case - GRID COMMS - SDH Replacement Core - November 2024 - confidential	Page 5 section 3.1 table 1	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	1/17
Ergon - 5.5.13 - Business Case - GRID COMMS - Edge Router Replacements - November 2024 - confidential	Page 7 section 4.2.1 table	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities	1/18

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						against Energy Queensland	issues could be used to compromise the functions that the equipment performs.	
Ergon - 5.5.14 - Business Case - GRID COMMS - Microwave Radio Edge South West and Wide Bay - November 2024 - confidential	Page 4 section 3.2 table Page 5, dot point 5 Appendix 3, Page 14 Pages 16 to 73	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	61/73
Ergon - 5.5.15 - Business Case - GRID COMMS - Microwave Radio Edge Nth QLD and Far North Replacements - November 2024 - confidential	Page 4 section 3.2 table Appendix 3, Page 14 Pages 16 to 73	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	61/73
Ergon - 5.5.17 - Business Case - GRID COMMS - Data Centre Ethernet Replacements - November 2024 - confidential	Page 5,6 section 4.1.1 table	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	2/13
Ergon - 5.5.19 - Business Case - GRID COMMS - Microwave Radio Core Replacements - November 2024 - confidential	Page 3 section 3.2 table	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to	1/12

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						against Energy Queensland	compromise the functions that the equipment performs.	
Ergon - 5.5.20 - Business Case - GRID COMMS - Operational Support Systems Replacements - November 2024 - confidential	Page 5 section 3.2 table	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	1/15
Ergon - 5.5.22 - Business Case - GRID COMMS - Core IP MPLS Ethernet Replacements - November 2024 - confidential	Page 6 section 4.1.1 table	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	1/15
Section 5.6 – Augex								
Ergon - 5.6.04 - Business Case - GRID COMMS - Reliability Core MPLS and Fibre - November 2024 - confidential	Page 16,17,18 Appendix 3.	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets and how there are architected.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks against Energy Queensland	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to compromise the functions that the equipment performs.	3/18
Ergon - 5.6.05 - Business Case - GRID COMMS - Reliability Edge Fringenet and Backhaul - November 2024 - confidential	Page 16,17,18 Appendix 3.	Cyber Security Asset Security	Communications Network Assets	Information affecting the security of the network	This information provides details of Energy Queensland's assets and how there are architected.	Disclosure could provide potential threat actors with additional information which could be utilised in cyber and other attacks	Knowing which models of equipment EQL utilises does not improve the argument for replacement, but knowledge of equipment vulnerabilities issues could be used to	3/18

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						against Energy Queensland	compromise the functions that the equipment performs.	
Section 5.12 – Other non-network capital expenditure								
Ergon - 5.12.02A - Business Case Non-Network Fleet - Crane Borer Replacement - November 2024 - Confidential	p4, Table row 1 p8, Figure 3 p10, Table 4 p11, Table 6 p13, Table 8 p16, Table 10 p18-19, App 4	Commercially sensitive information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	8/20
Ergon - 5.12.01A - Business Case Non-Network Fleet - EWP Replacement - November 2024 - Confidential	p3, Table row 6 p8, Figure 3 p11-12, Table 5 p12, Table 7 p14, Table 9 p15, Table 11 p18, Table 13 p20-25, App 4	Commercially sensitive information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	12/27
Section 6 – Operating Expenditure								
Ergon - 6.04A - Business Case - Smart Meter Data Acquisition - November 2024 - Confidential	p5, dot point 2 p6, section 2.3.1 p10-11, section 3.1.3 p17, 5.1.2 costs p18-19, 5.2.2 costs p21, 5.3.2 costs	Commercially sensitive information	Operating expenditure	Market sensitive cost inputs	We will be negotiating with a number of metering data and analytics providers for advanced data and an analytics platform.	Energex would face a detriment in negotiating costs if we were to publish our expected unit rates in the regulatory proposal. Providers would also face a detriment if they were to have their costs exposed in the regulatory proposal.	The consumers of Queensland will not get the most cost-effective outcome as vendors will price to the budget, not competitive pressures.	8/29

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	p23, 5.4.2 costs							
Ergon - 6.05 - Productivity initiatives - November 2024 - confidential	Slide 5	Commercially sensitive information	Productivity initiatives	Other	Information contains examples of initiatives which could impact future internal operational practices and business plans.	Disclosure of information could impact the due process of organisational change, prior to consultation of potential initiatives with employees.	There is no public benefit from publishing this document.	1/5

2. Confidential information: Excel Models

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Section 5.5 –Repex								
Ergon - 5.5.02C – Cost Benefit Analysis NPV Poles Model - November 2024 - confidential	All	Modelling information	Risk monetisation models	Information affecting the risk evaluation process	Currently in DNSP and TNSP level, risk monetisation is key topic, This is EQL owned produce and should not accessed without EQL permission.	if this information disclosed publicly, then it provides a unfair advantage to external consultant who tries to sell the EQL owned product externally.	The internal EQL product is always cost effective to consumer compare to an external product.	9/9
Ergon - 5.5.03C - NPV Model - Pole Top Structure Replacement (Ex-ante) - November 2024 - confidential	All	Modelling information	Risk monetisation models	Information affecting the risk evaluation process	Currently in DNSP and TNSP level, risk monetisation is key topic, This is EQL owned produce and should not accessed without EQL permission.	if this information disclosed publicly, then it provides a unfair advantage to external consultant who tries to sell the EQL owned product externally.	The internal EQL product is always cost effective to consumer compare to an external product.	8/8
Section 5.12 – Other non-network capital expenditure								
Ergon - 5.12.01B - NPV Model Non-Network Fleet - EWP Replacement - November 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	6/6
Ergon - 5.12.02B - NPV Model Non-Network Fleet - Crane Borer Replacement - November 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	5/5
Ergon - 5.12.03 - Non-network Fleet forecast replacement model - November 2024 - Confidential	All	Commercially sensitive financial information	Capital expenditure	Market sensitive cost inputs	Information includes supplier prices and information relating to commercial contracts	Disclosure of contract prices could potentially influence the behaviour of prospective suppliers	The ability to obtain competitive pricing is key to consumer affordability	13/13

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Section 6 – Operating Expenditure								
Ergon - 6.04B - NPV Model - Smart Meter Data Acquisition - November 2024 - confidential	All	Commercially sensitive information	Operating expenditure	Market sensitive cost inputs	We will be negotiating with a number of metering data and analytics providers for advanced data and an analytics platform.	Energex would face a detriment in negotiating costs if we were to publish our expected unit rates in the regulatory proposal. Providers would also face a detriment if they were to have their costs exposed in the regulatory proposal.	There is little public benefit in knowing the costs of these systems given they are particular to the use cases of a DNSP, rather than our customers themselves.	14/14

3. 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
Ergon Energy Revised Regulation Proposal 2025-30	281	1595	1876	15%	85%

Note:

This notice is an approximate indication of the proportion and comparative proportion of material in Ergon Energy's regulatory proposal that is subject to a claim of confidentiality compared to that which is not.

For excel files, each worksheet has been counted as one page.