



CONFIDENTIALITY CLAIM

PAL RIN 28 – PUBLIC
2026-31 REGULATORY PROPOSAL

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1. Confidentiality template

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 ¹ THAT THE CONFIDENTIAL INFORMATION FALLS WITHIN	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)
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1. Business cases						
PAL BUS 7.02 – Cyber security – Jan2025 – Confidential Sections 2.1, 2.2, 3.1, 4.2, 4.3, 4.4, 5 Pages 4, 5, 7, 13-19, 21-22, 24-25	Assessment of cyber security performance, areas of focus, options assessment and risks	Capex and opex	Information affecting the security of the network	Supports the identification of areas that may be the target of network security breaches	Major security risk of hacking and interference in IT systems and network control systems	The detriment to customers from increasing the risk to the security of the network outweighs the public benefit of detailed information regarding our security capability.
PAL BUS 8.02 – Training facility development – Jan2025 – Confidential Sections 3.1, 3.3 Pages 4, 8	2025 in-take levels and current state assessment	Capex	Other	Sensitive information regarding a third party	Sensitive information regarding a third party which may affect public perception and potential issues with adherence to industry standards	No public benefit from disclosing this information

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2. Attachments

PAL ATT 1.02 – Averaging periods for returns on equity and debt – Jan2025 – Confidential	Nominated averaging dates	Rate of return	Strategic information	Averaging period dates may indicate when the business undertakes interest rate hedging in the market	If this information was public, it may undermine the ability of the business to negotiate fair market pricing	Not in the public interest to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers
Section 1.2, Table 1.1						
Pages 2-3						

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PAL ATT 2.03 – Blunomy - Detailed demand forecasting methodology – Jan2025 – Confidential [whole document]	Overview of the methodology used in a proprietary third-party platform	Capex and opex	Other	The vendor considers the information to be confidential IP for the forecasting module in their platform.	The document contains detailed information on the methodology and mathematical techniques used within the platform to provide confidence in the robust nature of the forecasts. The vendor provided the document on a confidential basis and has only permitted it to be shared with the AER	Publishing the document will place the business in breach of its license agreement with the vendor and does not provide any public benefit
PAL ATT 6.02 – LEK - Data centre load forecasts – Oct2024 – Confidential [entire document]	Contractual obligation	Capex	Other	The vendor considers the information to be confidential	The vendor provided the document on a confidential basis and has only permitted it to be shared with the AER	Publishing the document will place the business in breach of its agreement with the vendor and does not provide any public benefit

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PAL ATT 6.03 – LEK – Customer electricity use – Oct2024 – Confidential [entire document]	Contractual obligation	Capex	Other	The vendor considers the information to be confidential	The vendor provided the document on a confidential basis and has only permitted it to be shared with the AER	Publishing the document will place the business in breach of its agreement with the vendor and does not provide any public benefit
PAL ATT 8.02 – VESI - ELAC meeting minutes – Aug2024 – Confidential Pages 1, 2, 3	Individual names, private meeting notes regarding staffing, resourcing and business operations	Capex	Personal information Other	Identification of individuals by name and sensitive information regarding a third party	The information directly identifies individuals, which raises privacy considerations Sensitive information regarding a third party which may affect public perception and potential issues with adherence to industry standards	Provision of this information does not provide any public benefit and may breach privacy obligations No public benefit from disclosing this information
PAL ATT 9.06 – Vegetation management status	Span unit rates and incentive payments	Opex	Market sensitive cost inputs	Identification of unit rates and other costs paid to external contractors	Disclosing unit rates and pricing would undermine any future competitive tendering process or the ability of the	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability

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update – Jul2022 – Confidential Page 4					business to negotiate fair market pricing	to negotiate optimal pricing. Higher costs would lead to higher prices for customers
PAL ATT 9.07 – Vegetation program of work overview – Sep2022 – Confidential Page 2	Forecast span volumes	Opex	Market sensitive cost inputs	Identification of volumes could influence negotiations with future providers as they could infer unit rates and make assessments on volumes of work available	This information would undermine any future competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers

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PAL ATT 12.04 – Meter asset management strategy – Jan2025 – Confidential [entire document]	Unique inspection and analytics capabilities	Opex	Other	In March 2024 the business submitted its Meter Asset Management Strategy, inclusive of our unique digital inspections and data analytics capabilities, to AEMO for approval. AEMO have requested we keep these capabilities, and their approval of it, confidential	AEMO requested this information remains confidential to ensure these capabilities are not incorrectly or inappropriately copied by other parties without developing the significant expertise and tools required to implement it properly	The business has developed unique digital inspection and data analytics capabilities. This avoids significant manual inspections effort and hence avoids significant opex, for the benefit of our customers. We have maintained its confidentiality as per AEMO's request
3. Models						
PAL MOD 7.01 - ERP and billing system cost - Jan2025 – Confidential [entire model]	Cost assumptions and estimates	Capex and opex	Market sensitive cost inputs	Includes cost assumptions and estimates	Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would

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						lead to higher prices for customers
PAL MOD 7.02 - ERP and billing system risk - Jan2025 – Confidential [entire model]	Cost assumptions and estimates included in risk model	Capex and opex	Market sensitive cost inputs	Includes cost assumptions and estimates	Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers
PAL MOD 7.03 - Cyber security cost - Jan2025 – Confidential [entire model]	Identification of security related areas of investment	Capex and opex	Information affecting the security of the network Market sensitive cost inputs	Supports the identification of areas that may be the target of network security breaches Includes cost assumptions and estimates	Major security risk of hacking and interference in IT systems and network control systems Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	The detriment to customers from increasing the risk to the security of the network outweighs the public benefit of detailed information regarding our security investment estimates and areas of focus.

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PAL MOD 7.04 - Cyber security risk - Jan2025 – Confidential [entire model]	Identification of security related areas of investment, cost estimates and risk assessments	Capex and opex	Information affecting the security of the network Market sensitive cost inputs	Supports the identification of areas that may be the target of network security breaches Includes cost assumptions and estimates	Major security risk of hacking and interference in IT systems and network control systems Disclosing cost information would undermine the competitive tendering process or the ability of the business to negotiate fair market pricing	The detriment to customers from increasing the risk to the security of the network outweighs the public benefit of detailed information regarding our security investment estimates and areas of focus.
PAL MOD 9.02 - Vegetation management - Jan2025 – Confidential [entire model]	Span unit rates, incentive payments and span volumes	Opex	Market sensitive cost inputs	Identification of unit rates, other costs and volumes could prejudice negotiations with future providers	Disclosing unit rates, volumes and pricing would undermine any future competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers

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PAL MOD 12.04 - Metering business case - Jan2025 – Confidential [unit rate build-up tab]	Vendor meter prices shown on the 'Unit rate buildup' sheet	Capex	Market sensitive cost inputs	Includes vendor meter prices in USD	Disclosing meter unit prices and volumes would undermine any future competitive tendering process or the ability of the business to negotiate fair market pricing	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers
4. Reset RIN documents						
PAL RIN 15 - Corporate services agreement CHED to PAL - Jul2021 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering

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					future contract negotiations they may enter into	process or restrict the business' ability to negotiate optimal pricing
PAL RIN 16 - Cost sharing agreement CP and PAL - Jul2021 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 17 - Network Services agreement NS to	Contract scope, terms and pricing between the business	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements	There is no detriment to the public from not disclosing this information as the AER is in

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PAL - Jul2021 – Confidential [entire document]	and the service provider				should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 18 - Resource partner agreement PAL to CHED - Jul2021 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the

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PAL RIN 19 - Resource partner agreement PAL to NS - Jul2021 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	future contract negotiations they may enter into Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	business' ability to negotiate optimal pricing There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 20 - Supply of aerial survey via LiDAR Beon to PAL -	Contract scope, terms and pricing between the business	Opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be	There is no detriment to the public from not disclosing this information as the AER is in possession of the

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Dec2020 – Confidential [entire document]	and the service provider				tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 21 - VPN group intra related party contracts - Jun2023 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the

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PAL RIN 22 - Supply of aerial services deed of variation Beon to PAL - Jan2023 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	business' ability to negotiate optimal pricing There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 23 - Supply of consultancy services ENEA to	Contract scope, terms and pricing between the business	Opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be	There is no detriment to the public from not disclosing this information as the AER is in possession of the

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CHED - Nov2023 – Confidential [entire document]	and the service provider				tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 24 - Vegetation management services agreement Civil Locale to PAL - Sep2023 - Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the

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 ¹ THAT THE CONFIDENTIAL INFORMATION FALLS WITHIN	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)
PAL RIN 25 - Aircraft lease agreement PAL to Beon - Dec2020 – Confidential [entire document]	Contract scope, terms and pricing between the business and the service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	business' ability to negotiate optimal pricing There is no detriment to the public from not disclosing this information as the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 26 - Aircraft lease agreement deed of variation PAL to	Contract scope, terms and pricing between the business	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive contractual arrangements should these services be	There is no detriment to the public from not disclosing this information as the AER is in possession of the

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Beon - Jan2023 – Confidential [entire document]	and the service provider				tendered. Disclosure of actual costs and margins would also compromise the supplier's contracts in place with other parties and any future contract negotiations they may enter into	information and is able to use it in any regulatory determination. However, its disclosure would undermine any future competitive tendering process or restrict the business' ability to negotiate optimal pricing
PAL RIN 31 - Embedded generator payments TUOS- Jan2025 – Confidential [entire document]	Names and payments to embedded generators	Opex	Personal information	Identification of customers/businesses by name and the payments they have received from the business	The information directly identifies customers/businesses and payments by year which raises privacy considerations	Provision of this information does not provide any public benefit and may breach privacy obligations

Confidentiality category

A NSP must categorise the confidential information into one of the following confidentiality categories:

- *Information affecting the security of the network* - information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network.
- *Market sensitive cost inputs* - information such as supplier prices, internal labour costs, and information which would affect the NSP's ability to obtain competitive prices in future infrastructure transactions, such as tender processes.
- *Market intelligence* - information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities.
- *Strategic information* – information such as the acquisition of land and easements, where the release of this information might adversely impact the NSP's ability to negotiate a fair market price for these items.
- *Personal information* - information about an individual or customer whose identity is apparent or can reasonably be ascertained from the information which raises privacy considerations.
- *Other* - information which the NSP claims is confidential but does not fit into one of the above categories.

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 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
Regulatory proposal Part A	0	30	30	0%	100%
Regulatory proposal Part B	0	120	120	0%	100%
Tariff structure statement - explanatory	0	56	56	0%	100%
Tariff structure statement - compliance	0	37	37	0%	100%
Business cases	14	1,123	1,137	1%	99%
Attachments	155	3,496	3,651	4%	96%
Models	63	843	906	7%	93%
Reset RIN documents	517	248	765	68%	32%
TOTAL	749	5,953	6,702	11%	89%

Note: This is an approximate indication of the proportion of Powercor's regulatory proposal for 2026-31 that is subject to a claim of confidentiality compared to that which is not



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