



CONFIDENTIALITY CLAIM

UE RIN 22 – 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						
UE BUS 7.02 – Cyber security – Jan2025 – Confidential Sections 2.1, 2.2, 3.1, 4.2, 4.3, 4.4, 5 Pages 3, 4, 6, 7, 12-23	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.
UE BUS 8.03 – Fleet – Jan2025 – Confidential Appendix B Page 11	Procurement options	Capex	Market sensitive cost inputs	Includes cost assumptions and sensitivities	If this information was made public it 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

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2. Attachments

UE ATT 1.02 – Averaging periods for cost of 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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UE 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
UE ATT 6.02 – 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

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UE ATT 9.05 – Vegetation management status update – Jul2022 – Confidential Page 4	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 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
UE ATT 9.06 – 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
UE ATT 12.04 – Meter asset management strategy – Jan2025 – Confidential	Unique inspection and analytics capabilities	Opex	Other	In October 2023 the business submitted its Meter Asset Management Strategy, inclusive of our unique digital	AEMO requested this information remains confidential to ensure these capabilities are not	The business has developed unique digital inspection and data analytics capabilities. This

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[entire document]				inspections and data analytics capabilities, to AEMO for approval. AEMO have requested we keep these capabilities, and their approval of it, confidential	incorrectly or inappropriately copied by other parties without developing the significant expertise and tools required to implement it properly	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						
UE 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 lead to higher prices for customers
UE MOD 7.02 - ERP and billing	Cost assumptions	Capex and opex	Market sensitive cost inputs	Includes cost assumptions and estimates	Disclosing cost information would undermine the	Not in the public interest to undermine competitive

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system risk - Jan2025 – Confidential [entire model]	and estimates included in risk model				competitive tendering process or the ability of the business to negotiate fair market pricing	tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would lead to higher prices for customers
UE 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.
UE MOD 7.04 - Cyber security risk - Jan2025 – Confidential	Identification of security related areas of investment, cost	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

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[entire model]	estimates and risk assessments		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	public benefit of detailed information regarding our security investment estimates and areas of focus.
UE MOD 9.02 - Vegetation management - Jan2025 – Confidential	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
[entire model]						
UE MOD 12.04 - Metering business case - Jan2025 – Confidential	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	Not in the public interest to undermine competitive tendering processes or to restrict the business' ability to negotiate optimal pricing. Higher costs would
[unit rate build-up tab]						

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					business to negotiate fair market pricing	lead to higher prices for customers
4. Reset RIN documents						
UE RIN 15 - Corporate services agreement UES to UED - 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
UE RIN 16 - IT project services	Contract scope, terms and	Capex and opex	Market sensitive cost inputs	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business'	There is no detriment to the public from not

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agreement CHED to UED - Apr2024 – Confidential [entire document]	pricing between the business and the service provider		Market intelligence		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	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
UE RIN 17 - Network Services agreement UES to UED - 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

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					future contract negotiations they may enter into	competitive tendering process or restrict the business' ability to negotiate optimal pricing
UE RIN 18 - Network Services agreement Zinfra to UED - Oct2022 - 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
UE RIN 19 - Supply of aerial survey via LiDAR Beon to UED	Contract scope, terms and pricing between	Opex	Market sensitive cost inputs	Includes private contractual rates, terms and conditions	Disclosing this information would affect the business' ability to obtain competitive	There is no detriment to the public from not disclosing this information

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- Apr2024 – Confidential [entire document]	the business and the service provider		Market intelligence		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	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
UE RIN 20 - UE group intra related party contracts deed of variation - 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	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
UE RIN 25 - Embedded generator payments TUOS and DUOS - 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
UE RIN 26 - Supply of consultancy services ENEA to CHED - Nov2023 – 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	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

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					future contract negotiations they may enter into	competitive tendering process or restrict the business' ability to negotiate optimal pricing
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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	32	32	0%	100%
Regulatory proposal Part B	0	103	103	0%	100%
Tariff structure statement - explanatory	0	56	56	0%	100%
Tariff structure statement - compliance	0	38	38	0%	100%
Business cases	17	759	776	2%	98%
Attachments	121	2,896	3,017	4%	96%
Models	63	587	650	10%	90%
Reset RIN documents	541	231	772	70%	30%
TOTAL	742	4,702	5,444	14%	86%



For further information visit:

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