Confidentiality Template

2020-25

January 2019

# Requirement

The Australian Energy Regulator (AER) requires that Ergon Energy prepare a separate confidentiality claim for each piece of information it claims to be confidential. This document provides the required confidentiality claims. In the required tabulated format we provide:

* The document identification
* The page or paragraph numbers for the sections that are considered confidential
* A description of the confidential information
* The topic covered by the confidential information
* The category of the confidential information (security of the network, market sensitive cost inputs, market intelligence, strategic information, personal information, other) with supporting rationale
* The detriment caused by the publication of the confidential information, and
* The optional consideration of the trade-off between the identified detriment and the public benefit should the information be released.

This document also provides information on the proportion of confidential information as required by the AER’s Confidentiality Guideline.

# Confidential information

The following table provides the required information where Ergon Energy has claimed confidentiality over information.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **Document containing confidential information** | **Page and paragraph number** | **Description of the confidential information** | **Topic the confidential information relates to** | **Confidentiality category** | **Reasons supporting why the information falls within the specified confidentiality category** | **Reasons supporting how and why disclosure would cause detriment** | **Reasons supporting why detriment outweighs the public benefit in disclosure** |
| EGX ERG 9.001 Averaging periods – rate of return JAN19 CONFID | Whole document | Averaging period for use in calculating the return on debt | Rate of return | Market sensitive information | The information is confidential because it specifies the date/s when Ergon Energy expects to raise debt. | Disclosure of Ergon Energy’s proposed dates on which it proposes to raise debt would potentially influence the behaviour of prospective lenders | As the Cost of Debt is a key input to the Rate of Return Ergon Energy receives on its assets, not receiving an efficient market rate will have a detrimental impact on the price customers will ultimately pay for the distribution of electricity. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 1; Figure 1 | Site Location map | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 1; Paragraph 2 | Site address | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 1; Paragraph 3 | Description of services, functions and facilities located on the site. | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 2; Paragraph 3 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 2; Paragraph 4 | Details EQL's Communication network portfolio components including highlight critical components located at the site. | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 2; Paragraph 5 | Details specific critical network operation, ICT and corporate infrastructure components located at the site | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 2; Paragraph 6 | Highlights the criticality of the infrastructure located at this site, EQ's data centre portfolio and the key dependencies within the portfolio. | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 3; Figure 2 | EQL's Data Centre Portfolio map | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 3; Paragraph 1 | Details specific critical network operation, ICT and corporate infrastructure components located at the site emphasising criticality | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 4; Figure 3 | Site Layout | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 4; Paragraph 4 | Figure3 title | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 4; Paragraph 5 | Details future strategic sites for critical infrastructure | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 5; Figure 4 | View of Operational Hub | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches.. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 5; Paragraph 1 | Figure 4 title | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 5; Paragraph 2 | Description of buildings and functions located on site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 5; Figure 5 | Building 1 - Building Layout | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 6; Paragraph 1 | Description of buildings and functions located on site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 6; Figure 6 | Specific Data Centre layout map | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 6; Paragraph 2 | Figure 6 title | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 6; Paragraph 4 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 6; Paragraph 7 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 7; Paragraph 1 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 7; Paragraph 2 | Details future strategic sites for critical infrastructure | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 7; Security Risk | Highlights the security vulnerabilities and risks at the site | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 8; Paragraph 1 | Highlights the security vulnerabilities and risks at the site | Critical Infrastructure | Information affecting the security of the network ; Strategic information | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | It is not appropriate given the criticality of EQL data centres to provide specific detail regarding core and non-core sites and the key dependencies within the data centre portfolio Highlighting the criticality of the infrastructure and the locations increases the risk and likelihood of security breaches. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 8; Paragraph 3 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 8; Paragraph 8 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 8; Paragraph 9 | This details tangible monetary benefits (capex & opex) which could impact EQL’s ability to obtain competitive prices in the future. | Operating expenditure (opex) & capital expenditure (capex) | Market sensitive cost inputs | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | This details tangible monetary benefits (capex & opex) which could impact EQL’s ability to obtain competitive prices in the future. | The ability to obtain competitive pricing is key to the consumer affordability. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 9; Scenario 1 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 9; Scenario 2 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 9; Scenario 3 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
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| EGX ERG 7.140 Business Case - Data Centre Property JAN19 CONFID | Page 10; Paragraph 1 | Highlights the criticality of the infrastructure located at this site | Critical Infrastructure | Information affecting the security of the network | Redacted information, if made public, may jeopardise security of the Ergon Energy or Energex networks or our ability to effectively plan and operate the network. | Highlighting the criticality of the infrastructure located at this site and the associated security vulnerabilities leaves the business exposed to significant financial costs in terms of loss of productivity and interruption to operational activities and disruption to consumers, should physical breaches and malicious damage occur. | Should malicious damage result from the disclosing of confidential information, EQL's ability to perform core duties would be crippled for an indefinite period of time. Should high voltage power outages occur during this time, switching to restore power to unaffected areas will not be possible, leaving customers without power for longer. |
| EGX ERG 7.119 Strategic Scope - Non-Network Alternatives JAN19 CONFID | Section 1, page 1, direct value for Energex;  Section 12, page 3, Energex table of forecast costs | Details of individual confidential NNA contract forecast costs for Bromelton | Customer embedded generation contracts | Market sensitive cost inputs | Information includes supplier prices and information relating to commercial contracts | Disclosure of the prices would affect our ability to obtain competitive prices in future transactions for demand response/embedded generation, including tender, Regulatory Investment Test - Distribution processes and request for demand management solutions under the Demand Management Incentive Scheme | Disclosure could result in higher prices from suppliers - increasing opex costs therefore resulting in increased customer costs. |
| EGX ERG 7.093 Strategic Proposal - LV Safety and Network Visibility JAN19 CONFID | Page 16, paragraph 6 | Cost information of the contract with Technology partner | Capital expenditure | Market sensitive cost inputs | Supplier prices for product prototype | Product prototype cost at the development stage are critical for the manufacturer (Redback Technology) | Making the supplier prices available to public does not provide any benefit to the customers and is in violation with the collaboration agreement with the external technology partner. |
| EGX ERG 7.056 Intelligent Grid Technology Plan JAN19 CONFID | Section 3 (pg16); Section 4.2 (pg18-19); Section 5 (pg20-21) | Information pertaining to security of operational technology and architecture of the network | Cyber security state, vulnerabilities, and planned strategy for managing in operational technology. | Information affecting the security of the network | Specific discussion of vulnerabilities, and planned strategy for addressing. | Vulnerabilities and planned strategy to addressing could be used as a malicious attack. | Is only a small proportion of document, and does not materially impact level of information provided to public. |
| EGX ERG 7.055 Intelligent Grid Enablement Strategic Proposal JAN19 CONFID | Exec Summary - pages ii and iii | Commercially sensitive financials | Costs allocated to solutions which EQL will need to deliver an intelligent grid | Market sensitive cost inputs | The systems will be procured from the market, so these costs are commercially sensitive | The market will price according to knowledge of our submission, and so we will not get a commercially competitive offer | The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures |
| EGX ERG 7.055 Intelligent Grid Enablement Strategic Proposal JAN19 CONFID | Section 3.1.2 and 3.1.3 - pages 10-11 | Commercially sensitive financials | Costs allocated to solutions which EQL will need to deliver an intelligent grid | Market sensitive cost inputs | The systems will be procured from the market, so these costs are commercially sensitive | Timing has a direct impact on pricing. The market will price according to knowledge of our submission, and so we will not get a commercially competitive offer | The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures |
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| EGX ERG 7.055 Intelligent Grid Enablement Strategic Proposal JAN19 CONFID | Section 3.1.4 page 11 | Network Risks | The risk assessment which drives the need for the solution | Information affecting the security of the network | The risks highlight deficiencies in the network which can be exploited | Knowledge of these risks (similar to cybersecurity risks) allow a potential perpetrator to plan an attack or exploit to impact the network by causing operational failure. | Puts security of supply at risk; which consequently puts customers' reliability and quality of supply at risk |
| EGX ERG 7.055 Intelligent Grid Enablement Strategic Proposal JAN19 CONFID | Section 3.4 pages 15-16 | Commercially sensitive financials | Costs allocated to solutions which EQL will need to deliver an intelligent grid | Market sensitive cost inputs | The systems will be procured from the market, so these costs are commercially sensitive | The market will price according to knowledge of our submission, and so we will not get a commercially competitive offer | The consumers of QLD will not get the most cost effective outcome as vendors will price to the budget, not competitive pressures |
| EGX ERG 7.051 Demand Management Regulatory Proposals (2020-25) JAN19 CONFID | Table 5, NNA forecast expenditure, page 17. | Table 5 details of individual confidential non network alternative contract forecast costs for Bromelton | Customer embedded generation contracts | Market sensitive cost inputs | Information includes supplier prices and information relating to commercial contracts | Disclosure of the prices would affect our ability to obtain competitive prices in future transactions for demand response/embedded generation, including tender, Regulatory Investment Test - Distribution processes and request for demand management solutions under the Demand Management Incentive Scheme | Disclosure could result in higher prices from suppliers - increasing opex costs therefore resulting in increased customer costs. |
| EGX ERG 7.051 Demand Management Regulatory Proposals (2020-25) JAN19 CONFID | Appendix 1 page 23 | Appendix 1: Existing non network alternative customer embedded generation contracts for Energex and Ergon Energy - details of actual and forecast costs for each contract | Customer embedded generation contracts | Market sensitive cost inputs | Information includes supplier prices and information relating to commercial contracts | Disclosure of the prices would affect our ability to obtain competitive prices in future transactions for demand response/embedded generation, including tender, Regulatory Investment Test - Distribution processes and request for demand management solutions under the Demand Management Incentive Scheme | Disclosure could result in higher prices from suppliers - increasing opex costs therefore resulting in increased customer costs. |
| EGX ERG 7.025  ID18 Internet Websites JAN19 CONFID | Entire Document | Business Case for internet websites containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| **Document containing confidential information** | **Page and paragraph number** | **Description of the confidential information** | **Topic the confidential information relates to** | **Confidentiality category** | **Reasons supporting why the information falls within the specified confidentiality category** | **Reasons supporting how and why disclosure would cause detriment** | **Reasons supporting why detriment outweighs the public benefit in disclosure** |
| EGX ERG 7.024  ID17 Cyber Security System JAN19 CONFID | Entire Document | Business Case for cyber security systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.023  ID16 Process Management System JAN19 CONFID | Entire Document | Business Case for process management systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.022  ID15 Network Planning Tools JAN19 CONFID | Entire Document | Business Case for network planning tools containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.021  ID14 Customer Management System JAN19 CONFID | Entire Document | Business Case for customer management systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.020  ID13 End User Productivity and Collaboration JAN19 CONFID | Entire Document | Business Case for user productivity and collaboration containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
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| EGX ERG 7.019  ID12 Document Management System JAN19 CONFID | Entire Document | Business Case for document management systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.018  ID11 Asset Inspections and Planning JAN19 CONFID | Entire Document | Business Case for inspections and planning containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.017  ID10 meter data management JAN19 CONFID | Entire Document | Business Case for meter data management containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.016  ID09 Service Interaction Portal  JAN19 CONFID | Entire Document | Business Case for service interaction portal containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.015  ID08 Information Repositories  JAN19 CONFID | Entire Document | Business Case for information repositories containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
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| EGX ERG 7.014  ID07 Customer Contact Technology JAN19 CONFID | Entire Document | Business Case for customer contact technology containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.013  ID06 Distribution Forecasting Tools JAN19 CONFID | Entire Document | Business Case for cyber security systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.012  ID05 Design Tools  JAN19 CONFID | Entire Document | Business Case for cyber security systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.011  ID04 Customer Market Systems   JAN19 CONFID | Entire Document | Business Case for customer market systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.010  ID03 Field Force Systems JAN19 CONFID | Entire Document | Business Case for field force systems containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
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| EGX ERG 7.009  ID02 Network Operations Consolidation and Replacement JAN19 CONFID | Entire Document | Business Case for network operations consolidation and replacement containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.008  ID01 GIS Consolidation and Replacement JAN19 CONFID | Entire Document | Business Case for GIS Consolidation and Replacement containing commercially sensitive information | Commercially sensitive information relating to the realisation of benefits in Energy Queensland | Personal, Other | Information relates to potential outcomes for specific groups of employees | Disclosure of information has the potential to jeopardise project outcomes within Energy Queensland | No public benefit would be gained from the disclosure of this information.  Please note that the whole document has been submitted as confidential initially while redaction occurs. A redacted version of the document and updated confidentiality template will be provided by 13 February as agreed with the AER. |
| EGX ERG 7.007 ICT Plan JAN19 CONFID | Page 52 | ICT Forecast for Energex | Expenditure cost by investment type | Market sensitive cost inputs | Vendor commercial in confidence information | Will set a cost expectation in the market and potentially limit lower cost solutions being offered | Will not get a value for money outcome causing upward pressure on energy prices |
| EGX ERG 7.007 ICT Plan JAN19 CONFID | Page 53 | ICT Forecast for Ergon | Expenditure cost by investment type | Market sensitive cost inputs | Vendor commercial in confidence information | Will set a cost expectation in the market and potentially limit lower cost solutions being offered | Will not get a value for money outcome causing upward pressure on energy prices |
| EGX ERG 17.031 EQL Treasury Management Agreement JAN19 CONFID | Whole document | Commercial-in-confidence agreement | Commercially sensitive information relating to the structure and operation of the Energy Queensland group of companies | Other | The information relates to the structure and operation of the Energy Queensland group of companies | Agreements relate to the Energy Queensland Group of companies, including those operating in competitive markets. | No public benefit would be gained from the disclosure of this information. |
| EGX ERG 17.030 EQL Services Agreement - Employment Model JAN19 CONFID | Whole document | Commercial-in-confidence agreement | Commercially sensitive information relating to the structure and operation of the Energy Queensland group of companies | Other | The information relates to the structure and operation of the Energy Queensland group of companies | Agreements relate to the Energy Queensland Group of companies, including those operating in competitive markets. | No public benefit would be gained from the disclosure of this information. |
| EGX ERG 17.027 EQL Framework Agreement JAN19 CONFID | Whole document | Commercial-in-confidence agreement | Commercially sensitive information relating to the structure and operation of the Energy Queensland group of companies | Other | The information relates to the structure and operation of the Energy Queensland group of companies | Agreements relate to the Energy Queensland Group of companies, including those operating in competitive markets. | No public benefit would be gained from the disclosure of this information. |
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| EGX ERG 15.009 Fee-based pricing model - ACS JAN19 CONFID | Worksheet "Traffic control fees" | Commercial-in-confidence agreement tenders | Commercial-in-confidence agreement tenders | Market sensitive cost inputs | Information includes supplier prices and information relating to commercial contracts | Disclosure of Energex’s tender prices would potentially influence the behaviour of prospective suppliers | Will not get a value for money outcome causing upward pressure on ACS services |
| EGX ERG 15.009 Fee-based pricing model - ACS JAN19 CONFID | Worksheet "Labour Rates" | Commercial-in-confidence agreement tenders | Commercial-in-confidence agreement tenders | Market sensitive cost inputs | Information includes forecast labour rates | Disclosure of Energex’s expected labour costs would potentially influence the behaviour of prospective suppliers | Will not get a value for money outcome causing upward pressure on ACS services |
| EGX ERG 17.067 ACS Supporting information (Reset RIN Schedule 1 s13 s14) JAN19 CONFID | Schedule 13 and Schedule 14 | Commercially-in-confidence information | Market sensitive cost inputs | Information includes forecast labour rates | Disclosure of Energex’s expected labour costs would potentially influence the behaviour of prospective suppliers | Will not get a value for money outcome causing upward pressure on ACS services | Market sensitive cost inputs |

# Proportion of confidential information

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| --- | --- | --- | --- | --- | --- |
| **Submission** | 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 2020-25 | 886 | 5593 | 6479 | 13.7% | 86.3% |
| Regulatory Models | 801 | 4,707 | 5,508 | 14.5% | 85.5% |
| Reset RINs | 87 | 687 | 772 | 11.0% | 89.0% |
| TSS and Pricing | 0 | 199 | 199 | 0% | 100% |

Note: This notice is an approximate indication of the proportion and comparative proportion of material that is subject to a claim of confidentiality compared to that which is not.