**Confidentiality Template**

**CitiPower** sets out below the completed Confidentiality template in respect of this regulatory proposal in accordance with the AER's *Better Regulation Confidentiality Guideline* dated November 2013 (**Confidentiality Guideline**).

Table 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 that the confidential information falls within** | **Provide a brief explanation of why the confidential information falls into the selected category****If the 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)** |
| --- | --- | --- | --- | --- | --- | --- |
| **Revised regulatory proposal** |
| CP CONFIDENTIAL RRP 1.0– CitiPower Revised Regulatory Proposal 2016-2020, January 2016pp. 14, 50, 137–138, 161–163, 176–179, 187–188Chapter 1 Executive summary, Chapter 3 The NEO preferable decision & Chapter 6 Operating expenditure | Details of lease renewals | Operating expenditure | Market sensitive cost inputs, strategic information | Disclose of details relating to lease renewals may impact current/future lease negotiations | Details of lease renewals may impact current/future lease negotiations | May lead to higher lease payments than otherwise available |
| **Attachments** |
| CP CONFIDENTIAL RRP ATT 4.24 - Memorandum of understanding between CitiPower, Powercor and the CEPU, attaching the ETU powerline enterprise agreement 2013–2016 (undated) | The Memorandum of undertsanding between Powercor/CitiPower and the CEPU sets out the terms and conditions upon which third party labour can be engaged by CitiPower and Powercor to work on the network.  | Real price growth | Market sensitive cost inputs and market intelligence | Information about the terms and conditions under which third party service providers supply labour to CitiPower and Powercor that is not in the public domain and may be harmful to the service provider if disclosed. | Information relating to service providers’ unit rates may be damaging to the service providers’ competitiveness or reputation. | Access to information does not add benefit to public or customers. We have disclosed the wage growth rates are the same as those in the Powercor/ CitiPower CEPU EBA which the information relevant to our Revised Regulatory Proposal.  |
| CP CONFIDENTIAL RRP ATT 6.16 - CitiPower, Lease renewals, pp. 1–22 | Options analysis for lease renewals | Operating expenditure | Market sensitive cost inputs, strategic information | Options analysis may impact current/future lease negotiations | Options analysis may impact current/future lease negotiations | May lead to higher lease payments than otherwise available |
| CP CONFIDENTIAL RRP ATT 6.17 - Heads of agreement for lease (draft), pp. 1–7 | Draft heads of agreement for lease between CitiPower and the vendor | Operating expenditure | Market sensitive cost inputs, strategic information, personal information | Lease terms may impact current/future lease negotiations with other vendors.Heads of agreement also includes personal information regarding the vendor. | Lease terms may impact current/future lease negotiations with other vendors | May lead to higher lease payments than otherwise available |
| CP CONFIDENTIAL RRP ATT 6.35 - CitiPower, Lease renewals (initial lease), pp. 1–5 | Initial lease between CitiPower and the vendor | Operating expenditure | Market sensitive cost inputs, strategic information | Lease terms identify the relevant property which may impact current/future lease negotiations with other vendors | Lease terms identify the relevant property which may impact current/future lease negotiations with other vendors | May lead to higher lease payments than otherwise available |
| CP CONFIDENTIAL RRP ATT 6.36 - CitiPower, Lease renewals (short-term), pp. 1–7 | Short-term lease extension between CitiPower and the vendor | Operating expenditure | Market sensitive cost inputs, strategic information | Lease terms identify the relevant property which may impact current/future lease negotiations with other vendors | Lease terms identify the relevant property which may impact current/future lease negotiations with other vendors | May lead to higher lease payments than otherwise available |
| CP CONFIDENTIAL RRP ATT 6.37 - CitiPower, Lease renewals (short-term extension), p. 1 | Short-term lease extension between CitiPower and the vendor | Operating expenditure | Market sensitive cost inputs, strategic information | Lease terms identify the relevant property which may impact current/future lease negotiations with other vendors | Lease terms identify the relevant property which may impact current/future lease negotiations with other vendors | May lead to higher lease payments than otherwise available |
| CP CONFIDENTIAL RRP ATT 10.11 - Black, Jensen, and Scholes,The Capital Asset Pricing Model, Some empirical tests, in Studies in the Theory of Capital Markets, Michael C. Jensen, ed., New York: Praeger, 1972 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee.  | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.12 - Friend and Blume, Measurement of Portfolio Performance under Uncertainty, American Economic Review, 60, 1970 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.13 - Fama and MacBeth, Risk, return, and equilibrium, Empirical tests, Journal of Political Economy, 81, 1973 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.14 - Rosenberg, Reid, and Lanstein, Persuasive evidence of market inefficiency, Journal of Portfolio Management 11, 1985 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.15 - Fama and French, The cross-section of expected stock returns, Journal of Finance 47, 1992 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.16 - Brealey, Myers, and Allen, Principles of Corporate Finance, 10th ed., McGraw-Hill Irwin, New York, NY, USA, 2011 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.17 - Brailsford, Gaunt and O’Brien, Size and book-to-market factors in Australia, Australian Journal of Management, 2012 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.30 - Sharpe, Capital asset prices: A theory of market equilibrium under conditions of risk, Journal of Finance, 19, 1964 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.90 - Brailsford, Handley and Maheswaran, Re-examination of the historical equity risk premium in Australia, Accounting and Finance 48, 2008  | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.91 - Lamberton, Ordinary share yields: A new statistical series, Sydney Stock Exchange Official Gazette, 14 July 1961 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.95 - Blume, Betas and their regression tendencies, Journal of Finance, 1975  | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.102 - Merton, Theory of rational option pricing, Bell Journal of Economics and Management Science, 1973 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 10.103 - Campbell, Lo and MacKinlay, The econometrics of financial markets, Princeton University Press, 1996 | Reference material cited in the revised regulatory proposal and/or expert reports submitted with the revised regulatory proposal and provided to the AER to assist it in making a new distribution determination | Rate of return | Other | We do not own the copyright in the material. To publish it we would be required to obtain permission from the copyright owner, which would likely involve lengthy commercial negotiations and the payment of a licence fee. | Publishing the material would result in a breach of the Copyright Act 1968 (Cth). | We are not aware of any material public benefit arising from publication of the material, as opposed to it being treated as confidential. The material may be obtained by stakeholders through appropriate channels (e.g. from the copyright owner). |
| CP CONFIDENTIAL RRP ATT 14.1 - Secure, Proposal for supply of Smart Meters BAU to PNS, August 2014. | Third party service providers unit rates for purchase of meters, in US dollars. | Metering - Alternative Control Services. | Market sensitive cost inputs and market intelligence | Information about the service providers’ business operations that is not in the public domain and may be harmful to the service provider if disclosed. | Information relating to service providers’ unit rates may be damaging to the service providers’ competitiveness or reputation. | Access to this information at a detailed unit cost level does not add benefit to public or customers. We have disclosed the unit cost information in Australian dollars as this protects the original service provider unit rates provided in US dollars. The expenditure information is also provided at a more aggregated category level. |
| CP CONFIDENTIAL RRP ATT 14.2 - Landis & Gyr, Request for quotation, November 2014.  | Third party service providers unit rates for purchase of meters, in US dollars. | Metering - Alternative Control Services. | Market sensitive cost inputs and market intelligence | Information about the service providers’ business operations that is not in the public domain and may be harmful to the service provider if disclosed. | Information relating to service providers’ unit rates may be damaging to the service providers’ competitiveness or reputation. | Access to this information at a detailed unit cost level does not add benefit to public or customers. We have disclosed the unit cost information in Australian dollars as this protects the original service provider unit rates provided in US dollars. The expenditure information is also provided at a more aggregated category level. |
| **Models** |
| CP CONFIDENTIAL RRP MOD 1.2 – CP Metering Capex & Opex.xlsxWorksheet ‘Material rates’ 1 sheet out of 16 worksheets | Third party service providers unit rates for purchase of meters and communications devices, in US dollars. | Metering - Alternative Control Services. | Market sensitive cost inputs and market intelligence | Information about the service providers’ business operations that is not in the public domain and may be harmful to the service provider if disclosed. | Information relating to service providers’ unit rates may be damaging to the service providers’ competitiveness or reputation. | Access to this information at a detailed unit cost level does not add benefit to public or customers. We have disclosed the unit cost information in Australian dollars as this protects the original service provider unit rates provided in US dollars. The expenditure information is also provided at a more aggregated category level. |
| CP CONFIDENTIAL RRP MOD 1.54 - Lease renewals step change | Options analysis for lease renewals | Operating expenditure | Market sensitive cost inputs, strategic information | Options analysis may impact current/future lease negotiations | Options analysis may impact current/future lease negotiations | May lead to higher lease payments than otherwise available |

1. CitiPower

**Portion of confidential material**

Table 1.2 Portion 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 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** |
| --- | --- | --- | --- | --- | --- |
| Revised regulatory proposal | 13 | 495 | 508 | 2.6% | 97.4% |
| Attachments | 1,439 | 22,160 | 23,599 | 6.1% | 93.9% |
| Models | 8 | 316 | 324 | 2.5% | 97.5% |
| Reset RIN - templates | 0 | 3 | 3 | 0% | 100% |
| **Total** | **1,460** | **22,974** | **24,434** | **6.0%** | **94.0%** |

1. CitiPower

Note: This notice is an approximate indication of the proportion and comparative proportion of material in CitiPower’s Revised Regulatory Proposal response that is subject to a claim of confidentiality compared to what is not.

CitiPower consents to the AER disclosing all CitiPower's non-confidential information on the AER website.