

**CitiPower Pty**  
**2016-2020 Price Reset**  
**Confidentiality Claim**

**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 1.1 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)
<b>Attachments to the Regulatory proposal and appendices</b>						
CP CONFIDENTIAL ATT 10.10 - Dimension Data, Monitoring IT security price estimate, 2014, pp. 3–19.	Pricing estimate for provision of IT monitoring services	Opex	Market sensitive cost inputs and market intelligence, and information affecting the security of the network	The attachment includes market sensitive pricing estimates, as well as details of the proposed service that may identify areas that may be the target of network security breaches.	Disclosing unit prices may limit bargaining power in future tender processes.  Major security risk of hacking and interference in IT systems and network control systems	Sufficient information is provided in our regulatory proposal for the public to assess the reasonableness of this step change (without disclosure of the full detail).
CP CONFIDENTIAL ATT 12.43, CitiPower, Letter proposing return on debt averaging periods, April 2015	Nominating the averaging period for 2016 cost of debt	Rate of Return	Rate of Return Guidelines require averaging period is to be confidential.	It relates to estimation of cost of debt for determining the allowed rate of return.	Information could be used by another party to the detriment of the company.	There is no public benefit and guideline requires this information to be confidential for each year.

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Table 1, page 2 2.5 paragraphs and foot note, page 2 Table 2, page 3 Part of a sentence, page 4						
CP CONFIDENTIAL APP E.41, CitiPower and Poweror, IT Security – Network Security Internal Audit Report, July 2013 Pages i / 7 / 8 / 9 / 10 / 11 / 12 / 13 / 14 / 15 / 16 / 17 / 18 / 19 / 20 / 21 / 22 / 23 / 24 / 25 / 26 / 27 / 28 / 29 / 30 / 31 / 32 / 33 / 34 / 35 / 36 / 37 / 38 / 39 / 40 / 41 / 42 / 43 / 44 / 45 / 46 / 47 / 48 / 49 / 50 / 51 / 52 / 53 / 54 / 55 / 56 / 57 / 58 / 59 / 60 / 61 / 62 / 63	Detailed descriptions of IT Network security vulnerabilities , and IP addresses and URL's	Non Network IT CAPEX & OPEX - Security Stream.	Information affecting the security of the network	Detailed descriptions of IT Network security vulnerabilities , and IP addresses and URL's which would allow access to CitiPower's IT network	Major security risk of hacking and interference in IT systems and network control systems	Access to this information does not add benefit to public or customers. Risk of damage to systems and outages caused by hacking would outweigh any gains.
CP CONFIDENTIAL APP E.45, SCADA IT Operations - Internal Audit Report, September 2012 Page i / 6 / 7 / 8 / 9 / 10 / 11 / 12 / 13 / 14 / 15 / 16 / 17 / 18 / 19 /	Detailed descriptions of SCADA IT operational security vulnerabilities , and IP addresses and URL's	Non Network IT CAPEX & OPEX - Security Stream.	Information affecting the security of SCADA IT operations	IP addresses and URL's which would allow access to CitiPower's IT network	Major security risk of hacking and interference in SCADA system	Access to this information does not add benefit to public or customers. Risk of damage to systems and outages caused by hacking would outweigh any gains.

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20 / / 21 / 22 / 23 / 24 / 25 / 26 / 27 / 28 / 29 / 30 / 31 / 32						
CP CONFIDENTIAL APP E.58 - CitiPower, Material Project, CUST 13 E Gate Development, Melbourne, pages 5&7 CP CONFIDENTIAL APP E.59 - CitiPower, Material Project, CUST 14 Metro Rail construction supply, page 4 CP CONFIDENTIAL APP E.60 - CitiPower, Material Project, CUST 15 Spencer Street development (Old Age site), pages 1,2,4&6 CP CONFIDENTIAL APP E.63 - CitiPower, Material Project, CUST 18 Yarra Trams (Dept of Transport), pages 1,2,4,5&6	Material business cases to support customer connection projects will contain detailed information including correspondence with the customer and costs relating to the overall works and their contribution for the connection.	Capex: connections	Personal information	Information about the connection and connection cost that is not in the public domain and may be harmful to the customer if disclosed.	Project specifics around strategy, location of assets and approach to customer connection, together with project costs, may be damaging to the customer's competitiveness or reputation.	The customer connection projects are discussed in the capital expenditure appendix using information that is publicly available.  These material business cases provide more granular information on the connection and the detriment caused to the customer by disclosure would outweigh any further public benefit.
CP CONFIDENTIAL APP G.3 - Lease renewals, April 2015, p.2-7.	Market sensitive information regarding the renewal of zone substation leases that are being renegotiated.	Opex	Market sensitive cost inputs and market intelligence	The attachment includes information that identifies the specific zone substations that are the	As the lease negotiations are ongoing, disclosing the specifics of the relevant zone substations	Sufficient information is provided in our regulatory proposal for the public to assess the reasonableness of this step change (without disclosure of the full detail).

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				subject of the lease renegotiations.	may limit our bargaining position.	
CP CONFIDENTIAL APP G.4 - Lease renewal valuations, pp. 1-11.	Market sensitive information regarding the renewal of zone substation leases that are being renegotiated.	Opex	Market sensitive cost inputs and market intelligence	The attachment includes information that identifies the specific zone substations that are the subject of the lease renegotiations, as well as corresponding lease valuations.	As the lease negotiations are ongoing, disclosing the specifics of the relevant zone substations may limit our bargaining position.	Sufficient information is provided in our regulatory proposal for the public to assess the reasonableness of this step change (without disclosure of the full detail).
CP CONFIDENTIAL ATT 0.5 Deed of Variation, Supply of Vegetation Management Services, 16 December 2009, pp. 2-4.  CP CONFIDENTIAL ATT 0.6 Supply of Vegetation Management Services Modification No.1, pp. 3-4.  CP CONFIDENTIAL ATT 0.8 Supply of Vegetation Management Services	Various service agreement contracts between CitiPower and its vegetation management services provider.	CP PUBLIC ATT 0.3 - CitiPower, Vegetation management expenditure, April 2015	Market sensitive cost inputs and market intelligence	Contracts include detail that may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes (e.g. unit prices).	Disclosing unit prices in these contracts may limit bargaining power in future tender processes.	Sufficient information is provided in our Vegetation management expenditure attachment for the public to assess the efficiency of vegetation management practices.

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<p>Modification No.3, pp. 4-5.</p> <p>CP CONFIDENTIAL ATT 0.9 Deed of Variation Supply of Vegetation Management Services, 1 March 2011, pp. 6-44.</p> <p>CP CONFIDENTIAL ATT 0.11 2012 Deed of Variation Supply of Vegetation Management Services, 1 January 2012, pp. 3-28.</p> <p>CP CONFIDENTIAL ATT 0.12 Supply of Vegetation Management Services Modification No.5, pp. 4-5.</p> <p>CP CONFIDENTIAL ATT 0.13 2013, 2014, 2015 Deed of Variation Supply of Vegetation Management Services, pp. 6-16.</p> <p>CP CONFIDENTIAL ATT 0.14 2014 and 2015 Deed of Variation, Supply of Vegetation Management Services between Powercor and Vemco, pp. 6-13.</p> <p>CP CONFIDENTIAL ATT 0.16 Vemco supply of services -</p>						

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conditions of contract 2008, pp. 5-74.						
<b>Models</b>						
Model: CP PUBLIC MOD 1.2 - CP Metering Capex & Opex - public version  Worksheet '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.
CitiPower detailed capital expenditure models plus one opex model:  CP CONFIDENTIAL MOD 1.16 CP augmentation capex.xlsx (entire workbook, 17 sheets)  CP CONFIDENTIAL MOD 1.18 CP connections capex.xlsm (entire workbook, 19 sheets)  CP CONFIDENTIAL MOD 1.19 CP environmental capex.xlsx (entire	Market sensitive cost information, as well as personal information that could identify specific customers.	Capex and opex	Market sensitive cost inputs and personal information.	Information about some connection and connection costs that are not in the public domain and may be harmful to the customer if disclosed.  The models include detail that may affect our ability to obtain competitive prices in future infrastructure transactions, such as	Project specifics around location of assets and approach to customer connection, together with project costs, may be damaging to the customer's competitiveness or reputation.  Disclosing unit prices in these models may limit	Access to this information does not add benefit to public or customers. Expenditure information, consistent with AER reporting requirements, is provided in the publicly available Price Reset RIN Templates.

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workbook, 9 sheets) CP CONFIDENTIAL MOD 1.21 CP lines replacement capex.xlsm (entire workbook, 35 sheets) CP CONFIDENTIAL MOD 1.22 CP protection replacement capex.xlsm (entire workbook, 16 sheets) CP CONFIDENTIAL MOD 1.23 CP faults capex.xlsm (entire workbook, 11 sheets) CP CONFIDENTIAL MOD 1.24 CP network SCADA.xlsm (entire workbook, 28 sheets) CP CONFIDENTIAL MOD 1.25 CP plant & stations capex.xlsx (entire workbook, 10 sheets) CP CONFIDENTIAL MOD 1.26 CP VBRC capex.xlsm (entire workbook, 9 sheets) CP CONFIDENTIAL MOD 1.27 CP Yarra Valley Water replacement capex.xlsx (entire workbook, 7 sheets)				tender processes (e.g. unit prices).	bargaining power in future tender processes.	

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CP CONFIDENTIAL MOD 1.32 CP GHD Vegetation Management 24032015.xlsx (1 of 8 sheets)						
<b>Reset RIN Regulatory templates</b>						
Appendix A: Regulatory templates  CP CONFIDENTIAL RIN 1.1- CitiPower, Vic Reset RIN 2016-20 – Consolidated Information  Template 2.12 Input Tables	Related party contract cost and related party contract margin  2015 only	Opex and capex	Market sensitive cost inputs  Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower.	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.



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Appendix A: Regulatory templates CP CONFIDENTIAL RIN 1.2- CitiPower, Vic Reset RIN 2016-20 - Back casting Template 2.12 Input tables	Related party contract cost and related party contract margin  2009-2014	Opex and capex	Market sensitive cost inputs  Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower.	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.
<b>Reset RIN Schedule 1 attachments</b>						
CP CONFIDENTIAL RIN 1.19, CitiPower, 2009-2013 Category Analysis RIN Tables 2.3.1, 2.3.2 and 2.12	Related party contract cost and related party contract margin	Opex and capex	Market sensitive cost inputs Market intelligence	Disclosure of this information would compromise the commercial activities of	Disclosure of the actual costs and margins would potentially compromise the contracts CHED	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any

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				PNS and CHED Services which provide services to parties other than CitiPower/Powercor Australia.	Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.
CP CONFIDENTIAL RIN 1.20, CitiPower, 2014 Category Analysis RIN Tables 2.3.2 and 2.12	Related party contract cost and related party contract margin	Opex and capex	Market sensitive cost inputs Market intelligence	Disclosure of this information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than CitiPower.	Disclosure of the actual costs and margins would potentially compromise the contracts CHED Services and PNS have in place with other parties and/or future bids they may make for other contracts. Competitors could potentially undercut	There is little detriment to the long term interests of consumers from this information not being disclosed. The AER is in possession of the information and is able to use it as it sees fit in any regulatory determination. Further, the AER, and prior to that the ESCV, did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these related party contracts based on their relative merits at the time.

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					prices on existing contracts held by each business or compromise their bargaining position in any future tender.	
CP CONFIDENTIAL RIN 1.22 Corporate services agreement 2012-2014, pp. 26-102. CP CONFIDENTIAL RIN 1.23 Corporate services agreement, deed of variation 2014, p. 4. CP CONFIDENTIAL RIN 1.24 Metering services agreement 2008-2013, pp. 7, 31-37. CP CONFIDENTIAL RIN 1.25 Metering services agreement, deed of variation 2014, pp. 10-16. CP CONFIDENTIAL RIN 1.26 Metering services agreement, deed of variation 2015, pp. 9-15. CP CONFIDENTIAL RIN 1.28 Network services agreement	Various service agreements contracts between CitiPower and its related entities.	CP PUBLIC RIN 1.21 CitiPower, Other Entities, 30 April 2015	Market sensitive cost inputs and market intelligence	Contracts include detail that may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes (e.g. unit prices).	Disclosing unit prices in these contracts may limit bargaining power in future tender processes.	Sufficient information is provided in our Other entities attachment for the public to assess the efficiency of our related party margins.

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2015, pp. 4, 7-12. CP CONFIDENTIAL RIN 1.27 Network services agreement 2012-2014, pp. 32-38. CP CONFIDENTIAL RIN 1.30 DRMS constitution, pp. 2-26.						

Source: CitiPower

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**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
Regulatory proposal overview paper	0	22	22	0%	100%
Regulatory proposal	0	344	344	0%	100%
Appendices	0	412	412	0%	100%
Attachments	290	25,171	25,461	1%	99%
Models	163	502	665	25%	75%
Reset RIN - templates	3 (tables)	94 (tables)	97 (tables)	3%	97%
Reset RIN – schedule 1 attachments	134	693	825	16%	84%

Source: CitiPower

Note: This notice is an approximate indication of the proportion and comparative proportion of material in CitiPower’s Regulatory Proposal and Reset RIN 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.