

CitiPower Pty Ltd

2021-2026 Price Reset

Confidentiality Claim

1.1 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 August 2017 (**Confidentiality Guideline**).

Title, page and paragraph number of document containing the confidential information	Description of the confidential information.	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Identify the recognised confidentiality category ¹ that the confidential information falls within.	Provide a brief explanation of why the confidential information falls into the selected category. If information falls within 'other' please provide further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers).
Attachments to the Regulatory Proposal and appendices						
CP BUS 9.01 - Security of critical infrastructure - Jan2020 – Confidential (entire document)	Detailed description of regulatory obligations and the cost forecast approach	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of "protected information"	Disclosure of unauthorised information is a criminal offence under the FATA	The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal, chapter 9, provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
CP ATT148 - FIRB - No objection letter - Apr2017 - Confidential (entire document)	Letter from FIRB providing no objection to acquisition	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of "protected information"	Disclosure of unauthorised information is a criminal offence under the FATA	The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal, chapter

¹ Refer to table below

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

							9, provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
CP ATT149 - FIRB - Work plan approval letter - May2018 - Confidential (entire document)	Letter from FIRB approving the work plan for transitioning to compliance with the conditions	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of “protected information”	Disclosure of unauthorised information is a criminal offence under the FATA		The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
CP ATT147 - Compliance work plan - Nov2017 – Confidential (entire document)	Approved work plan for transitioning to compliance with conditions	Opex	Information affecting the security of the network	<i>Foreign Acquisitions and Takeovers Act 1975 (FATA)</i> restricts disclosure of “protected information”	Disclosure of unauthorised information is a criminal offence under the FATA		The provisions in the FATA are intended to protect national security and therefore outweigh the public benefit from disclosing the information. Our regulatory proposal provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.
CP ATT145 - CGI - Quote for onshoring - Aug2019 - Confidential (entire document)	Pricing estimate for provision of IT services	Opex	Market sensitive cost inputs and market intelligence, and information affecting the security of the network	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 price estimates would undermine the competitive tendering process. Major security risk of hacking and interference in IT systems and network control systems		The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information. Our regulatory proposal, chapter 9, provides sufficient information for customers to understand

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

							magnitude of the total cost.
CP ATT146 - DD - Quote for onshoring - Aug2019 - Confidential (entire document)	Pricing estimate for provision of IT services	Opex	Market sensitive cost inputs and market intelligence, and information affecting the security of the network	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 price estimates would undermine the competitive tendering process. Major security risk of hacking and interference in IT systems and network control systems	The detriment to customers of undermining competitive tender processes and increasing network security risk outweighs the public benefit from disclosure of the information. Our regulatory proposal, chapter 9, provides sufficient information for customers to understand the magnitude of the total cost.	
CP ATT047 - Cyber strategy review - Nov2019 - Confidential (entire document)	Assessment of our cyber security capabilities	IT capex	Information affecting the security of the network	Provides information which may identify areas that may be the target of network security breaches.	Major security risk of hacking and interference in IT systems and network control systems	Our cyber security business case [CP BUS 7.04 - Cyber security - Jan2020 – Public] provides sufficient information for customers to assess the reasonableness of our proposal. The detriment to customers from increasing the risk to the security of the network outweighs the public benefit of detailed information regarding our security capability.	
CP BUS 9.02 - Yarra Trams - Jan2020 - Public (Page 3 para 4 Page 5 para 2 & 3)	Discussion of our commercial arrangements with Yarra trams	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive information which may impact market contestability and commercial arrangements	Disclosing the information could impact commercial arrangements potentially resulting in detriment to customers	Our business case [CP BUS 9.02 - Yarra Trams - Jan2020 – Public] provides sufficient information for customers to assess the reasonableness of our proposed step change. Therefore the potential detriment to market contestability and commercial arrangements outweighs the	

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

						public benefit of disclosing the information.
CP ATT094 - Yarra Trams planned tram works - Jan2020 - Confidential (entire document)	Spreadsheet of tram works to 2026-27 provided by Yarra Trams	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive information which may impact market contestability and commercial arrangements	Disclosing the information could impact commercial arrangements potentially resulting in detriment to customers	Our business case [CP BUS 9.02 - Yarra Trams - Jan2020 – Public] provides sufficient information for customers to assess the reasonableness of our proposed step change. Therefore the potential detriment to market contestability and commercial arrangements outweighs the public benefit of disclosing the information.
CP BUS 5.01 - Data centre connection - Jan2020 – Confidential Page 3, 4, 5, 7, 8, 9, 11.	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 / site and approach to customer connection, together with project costs, may be damaging to the customer’s competitiveness, reputation and market disclosure obligations.	The customer connection projects are discussed in the connection chapter using information that is publicly available. These material business cases provide more granular information on the connection. The detriment caused to the customer by disclosure would outweigh any further public benefit
CP BUS 5.02 - Westgate Tunnel - Jan2020 - Public Confidential	Material business cases to support customer	Capex: connections	Personal information	Information about the connection and connection cost that is not in the public domain and may be harmful to the	Project specifics around strategy, location of assets / site and approach to customer connection, together with	The customer connection projects are discussed in the connection chapter using information that is publicly

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

Page 1 and 7	connection projects will contain detailed information including correspondence with the customer and costs relating to the overall works and their contribution for the connection.		customer if disclosed		project costs, may be damaging to the customer’s competitiveness, reputation and market disclosure obligations.	available. These material business cases provide more granular information on the connection. The detriment caused to the customer by disclosure would outweigh any further public benefit
CP ATT111 - Westgate Tunnel relocation - Oct2017 – Confidential (entire document)	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 / site and approach to customer connection, together with project costs, may be damaging to the customer’s competitiveness, reputation and market disclosure obligations.	The customer connection projects are discussed in the connection chapter using information that is publicly available. These material business cases provide more granular information on the connection. The detriment caused to the customer by disclosure would outweigh any further public benefit
CP ATT126 - Corporate services agreement 2017 - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination.

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

					and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	However, its disclosure would have detriment outlined in the previous column. 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 contracts based on their relative merits at the time.
CP ATT127 - Corporate services agreement 2017 signed - Dec2019 - Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. 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 contracts based on their relative merits at the time.
CP ATT128 - DRMF Constitution - Dec2004 – Confidential (entire document)	Contract between us and service provider	Reset RIN	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. Further, the AER, and prior to that the ESCV,

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

					may make for other contracts.	did not disclose the information as part of previous regulatory determinations, yet made decisions relating to these contracts based on their relative merits at the time.
CP ATT129 - Network services agreement 2017 - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty’s contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. 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 contracts based on their relative merits at the time.
CP ATT130 - Resources agreement 2017 (CP to CHED) - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty’s contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. 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

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

						contracts based on their relative merits at the time.
CP ATT131 - Resources agreement 2017 (CP to PNS) - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. 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 contracts based on their relative merits at the time.
CP ATT132 - Cost sharing agreement 2017 - Dec2019 – Confidential (entire document)	Contract between us and service provider	Capex and opex	Market sensitive cost inputs Market intelligence	Includes private contractual rates and/or terms and conditions.	If disclosed, this would affect our ability to obtain competitive contractual arrangements should these services be tendered. Disclosure of the actual costs and margins would also compromise the counterparty's contracts in place with other parties and/or future bids they may make for other contracts.	There is no detriment to the public from not disclosing this information—the AER is in possession of the information and is able to use it in any regulatory determination. However, its disclosure would have detriment outlined in the previous column. 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 contracts based on their relative merits at the time.

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

Models						
CP MOD 9.01 - Step changes - Jan2020 – Confidential (cost build up)	Pricing estimates for IT service providers	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing estimates	Disclosing price estimates would undermine the competitive tendering process.	The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information. The public version of the model provides sufficient information for customers to understand the magnitude of the total cost.
CP MOD 5.02 - Connections major projects - Jan2020 – Confidential (entire model)	Model outlining major connections and costs.	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 identification and costs may be damaging to the customer’s competitiveness, reputation and market disclosure obligations.	This model is available to the AER to make decisions on. Customers will not benefit from having this information but it will cause detriment to the parties listed in the model.
Reset RIN Regulatory templates						
CP RIN001 – Workbook 1 – Reg determination – Jan2020 – Public	Related party transactions	2.11 Labour	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/Powercor Australia	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.

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

CP RIN002 - Workbook 2 - New historical CAT - Jan2020 – Public	Related party transactions	2.11 Labour	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/Powercor Australia	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.
CP RIN008 - Workbook 8 - Historical FY CAT - Jan2020 - Public	Related party transactions	2.11 Labour 2.12 Input tables	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/Powercor Australia	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.
CP RIN009 - Workbook 9 - Historical FY Annual - Jan2020 - Public	Related party transactions	2.11 Labour 8.4 Opex	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/Powercor	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	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

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

	Australia	could potentially undercut prices on existing contracts held by each business or compromise their bargaining position in any future tender.	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.
--	-----------	---	---

CitiPower Pty Ltd

2021-2026 Price Reset

Confidentiality Claim

Confidentiality category

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

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

CitiPower Pty Ltd
2021-2026 Price Reset
Confidentiality Claim

1.2 Proportion of confidential material

Submission Title	Number of pages of submission that include information subject to a claim of confidentiality	Number of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Overview paper	0	20	20	0%	100%
Regulatory proposal	0	198	198	0%	100%
Appendices	0	268	268	0%	100%
Business cases	29	595	624	5%	95%
Models	2	795	797	0%	100%
RIN documents	6	171	177	3%	97%
Attachments	468	6,100	6,581	7%	93%
TOTAL	505	8,119	8,624	6%	94%

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.