

Powercor Australia Ltd 2016-2020 Price Reset Confidentiality Claim

Confidentiality Template

Powercor 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)
Attachments to the Regulatory Proposal and appendices						
PAL 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).
PAL CONFIDENTIAL ATT 12.43, Powercor, Letter proposing return on debt averaging periods, April 2015 Table 1, page 2 2.5 paragraphs and foot note,	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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page 2 Table 2, page 3 Part of a sentence, page 4						
PAL CONFIDENTIAL APP E.25, Victoria Power Networks Group, 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 Powercor'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.
PAL CONFIDENTIAL APP E.62, CHEDHA Holding Companies, SCADA IT Operations - Internal Audit Report, September 2012 Page i / 6 / 7 / 8 / 9 / 10 / 11 / 12 / 13 / 14 / 15 / 16 / 17 / 18 / 19 / 20 / / 21 / 22 / 23 / 24 / 25 / 26	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 Powercor'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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/ 27 / 28 / 29 / 30 / 31 / 32						
<p>PAL CONFIDENTIAL APP E.73 Powercor, Material Project, CUST 29 Murray Goulburn, (Cobram) stage 1, pages 1,3,4,5,6&7</p> <p>PAL CONFIDENTIAL APP E.74 Powercor, Material Project, CUST 30 Murray Goulburn, (Koroit) stage 1, pages 1,4,5&6</p> <p>PAL CONFIDENTIAL APP E.75 Powercor, Material Project, CUST 31 Coonooer Windfarm, pages 4&5</p> <p>PAL CONFIDENTIAL APP E.76 Powercor, Material Project, CUST 32 Berrimal Windfarm- St Arnaud, pages 2,3,4,5&6</p> <p>PAL CONFIDENTIAL APP E.77 Powercor, Material Project, CUST 33 Mt Gellibrand Windfarm, pages 4,5&6</p> <p>PAL CONFIDENTIAL APP E.78 Powercor, Material Project, CUST 34 Project Harvest Generation – Carwarp, pages</p>	<p>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.</p>	Capex: connections	Personal information	<p>Information about the connection and connection cost that is not in the public domain and may be harmful to the customer if disclosed.</p>	<p>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.</p>	<p>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. The detriment caused to the customer by disclosure would outweigh any further public benefit.</p>

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<p>1,4,5&6 PAL CONFIDENTIAL APP E.79 Powercor, Material Project, CUST 35 Yendon Windfarm, pages 1,2,3,4&5 PAL CONFIDENTIAL APP E.80 Powercor, Material Project, CUST 28 Vic Gov Powerline Relocation Fund, pages 5&6</p>						
<p>PAL CONFIDENTIAL ATT 0.13 Deed of Variation, Supply of Vegetation Management Services, 16 December 2009, pp. 2-4. PAL CONFIDENTIAL ATT 0.15 Supply of Vegetation Management Services Modification No.1, pp. 3-4. PAL CONFIDENTIAL ATT 0.17 Supply of Vegetation Management Services Modification No.3, pp. 4-5. PAL CONFIDENTIAL ATT 0.18 Deed of Variation Supply of Vegetation Management Services, 1 March 2011, pp. 6-</p>	<p>Various service agreement contracts between Powercor and its vegetation management services provider.</p>	<p>PAL PUBLIC ATT 0.10 Powercor, Vegetation Management Expenditure, April 2015</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Contracts include detail that may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes (e.g. unit prices).</p>	<p>Disclosing unit prices in these contracts may limit bargaining power in future tender processes.</p>	<p>Sufficient information is provided in our Vegetation management expenditure attachment for the public to assess the efficiency of vegetation management practices.</p>

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<p>44.</p> <p>PAL CONFIDENTIAL ATT 0.20 2012 Deed of Variation Supply of Vegetation Management Services, 1 January 2012, pp. 3-28.</p> <p>PAL CONFIDENTIAL ATT 0.21 Supply of Vegetation Management Services Modification No.5, pp. 4-5.</p> <p>PAL CONFIDENTIAL ATT 0.22 2013, 2014, 2015 Deed of Variation Supply of Vegetation Management Services, pp. 6-16.</p> <p>PAL CONFIDENTIAL ATT 0.23 2014 and 2015 Deed of Variation, Supply of Vegetation Management Services between Powercor and Vemco, pp. 6-13.</p> <p>PAL CONFIDENTIAL ATT 0.25 Vemco supply of services - conditions of contract 2008, pp. 5-74.</p>						
Models						

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<p>Model: PAL PUBLIC MOD 1.2 - PAL Metering Capex & Opex - public version</p> <p>Worksheet 'Material rates' 1 sheet out of 16 worksheets</p>	<p>Third party service providers unit rates for purchase of meters and communications devices, in US dollars.</p>	<p>Metering - Alternative Control Services.</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Information about the service providers' business operations that is not in the public domain and may be harmful to the service provider if disclosed.</p>	<p>Information relating to service providers' unit rates may be damaging to the service providers' competitiveness or reputation.</p>	<p>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.</p>
<p>Powercor detailed capital expenditure plus one opex models:</p> <p>PAL CONFIDENTIAL MOD 1.17 PAL augmentation capex.xlsx (entire workbook, 14 sheets)</p> <p>PAL CONFIDENTIAL MOD 1.19 PAL connections capex.xlsm (entire workbook, 19 sheets)</p> <p>PAL CONFIDENTIAL MOD 1.20 PAL environmental capex.xlsx</p>	<p>Market sensitive cost information, as well as information that could identify specific customers.</p>	<p>Capex and opex</p>	<p>Market sensitive cost inputs and personal information.</p>	<p>Information about some connection and connection costs that are not in the public domain and may be harmful to the customer if disclosed.</p> <p>The models include detail that may affect our ability to obtain competitive prices in future infrastructure</p>	<p>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.</p> <p>Disclosing unit prices in these models may limit</p>	<p>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.</p>

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<p>(entire workbook, 8 sheets) PAL CONFIDENTIAL MOD 1.22 PAL lines replacement capex.xlsm (entire workbook, 35 sheets) PAL CONFIDENTIAL MOD 1.23 PAL protection replacement capex.xlsm (entire workbook, 16 sheets) PAL CONFIDENTIAL MOD 1.24 PAL faults capex.xlsm (entire workbook, 12 sheets) PAL CONFIDENTIAL MOD 1.25 PAL network SCADA.xlsm (entire workbook, 30 sheets) PAL CONFIDENTIAL MOD 1.26 PAL plant & stations capex.xlsx (entire workbook, 11 sheets) PAL CONFIDENTIAL MOD 1.28 PAL VBRC capex and contingent project.xlsm (entire workbook, 17 sheets) PAL CONFIDENTIAL MOD 1.33 PAL GHD Vegetation Management 24032015.xlsx (2 sheets of 8 sheets)</p>				<p>transactions, such as tender processes (e.g. unit prices).</p>	<p>bargaining power in future tender processes.</p>	

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Reset RIN Regulatory templates						
Appendix A: Regulatory templates PAL CONFIDENTIAL RIN 1.1- Powercor, 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 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 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.
Appendix A: Regulatory templates PAL CONFIDENTIAL RIN 1.1-	Zone substation maximum demand.	Spatial maximum demand	Personal information	Table 5.4.1 contains coincident and non-coincident max demands	The information could be market sensitive to the customers who own the	There is little public benefit to be obtained in releasing information on customer

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<p>Powercor, Vic Reset RIN 2016-20 – Consolidated Information Template 5.4 Maximum Demand and Utilisation at Spatial</p> <p>Powercor customer owned zone substations</p> <p>IMK CPL SCI/A SCI/B TYA BGF BGL IKA FDN SRC BCG HCP DTN-BNG</p>				<p>by zone substation. Powercor has 13 entries in this table for customer owned zone substations. Confidentiality is being claimed to protect specific information which could identify the customer and their load information. The table in the first column identifies the zone subs which are in the Reset RIN Table 5.4.1, which require confidentiality.</p>	<p>zone substations.</p>	<p>owned substations, and consequently any detriment is negligible.</p>
<p>Appendix A: Regulatory</p>	<p>Related party contract cost and related party contract</p>	<p>Opex and capex</p>	<p>Market sensitive cost inputs</p>	<p>Disclosure of this</p>	<p>Disclosure of the actual</p>	<p>There is little detriment to</p>

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templates PAL CONFIDENTIAL RIN 1.2- Powercor, Vic Reset RIN 2016-20 - Back casting Template 2.12 Input tables	margin 2009-2014		Market intelligence	information would compromise the commercial activities of PNS and CHED Services which provide services to parties other than Powercor.	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.	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.
Reset RIN Schedule 1 attachments						
PAL CONFIDENTIAL RIN 1.19, Powercor, 2009-2013 Category Analysis RIN, Tables 2.3.1, 2.3.2 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	Disclosure of the actual costs and margins would potentially	There is little detriment to the long term interests of consumers from this information

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				of PNS and CHED Services which provide services to parties other than CitiPower/Powercor Australia.	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.	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.
PAL CONFIDENTIAL RIN 1.19, Powercor, 2009-2013 Category Analysis RIN, Template 5.4 MAXIMUM DEMAND AND UTILISATION AT SPATIAL LEVEL, refer	Zone substation maximum demand.	Spatial maximum demand	Personal information.	In Table 5.4.1 contains coincident and non-coincident max demands by zone substation. Powercor has 13 entries in this	The information could be market sensitive to the customers who own the zone substations.	There is little public benefit to be obtained in releasing information on customer owned substations, and consequently any

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<p>TABLE 5.4.1 NON-COINCIDENT & COINCIDENT MAXIMUM DEMAND.</p> <table border="1" data-bbox="248 715 501 1289"> <tr> <td>Powercor customer owned zone substations</td> </tr> <tr> <td>IMK</td> </tr> <tr> <td>CPL</td> </tr> <tr> <td>SCI/A</td> </tr> <tr> <td>SCI/B</td> </tr> <tr> <td>TYA</td> </tr> <tr> <td>BGF</td> </tr> <tr> <td>BGL</td> </tr> <tr> <td>IKA</td> </tr> <tr> <td>FDN</td> </tr> <tr> <td>SRC</td> </tr> <tr> <td>BCG</td> </tr> <tr> <td>HCP</td> </tr> <tr> <td>DTN-BNG</td> </tr> </table>	Powercor customer owned zone substations	IMK	CPL	SCI/A	SCI/B	TYA	BGF	BGL	IKA	FDN	SRC	BCG	HCP	DTN-BNG				<p>table for customer owned zone substations. Confidentiality is being claimed to protect specific information which could identify the customer and their load information. The table in the first column identifies the zone subs which are in the Cat RIN Table 5.4.1, which require confidentiality.</p>		<p>detriment is negligible.</p>
Powercor customer owned zone substations																				
IMK																				
CPL																				
SCI/A																				
SCI/B																				
TYA																				
BGF																				
BGL																				
IKA																				
FDN																				
SRC																				
BCG																				
HCP																				
DTN-BNG																				
<p>PAL CONFIDENTIAL RIN 1.20, Powercor, 2014 Category</p>	<p>Related party contract cost and related party contract margin</p>	<p>Opex and capex</p>	<p>Market sensitive cost inputs Market intelligence</p>	<p>Disclosure of this information would compromise the</p>	<p>Disclosure of the actual costs and margins would</p>	<p>There is little detriment to the long term interests of consumers</p>														

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Analysis RIN, Tables 2.3.1, 2.3.2 2.12				commercial activities of PNS and CHED Services which provide services to parties other than Powercor Australia.	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.	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.
PAL CONFIDENTIAL RIN 1.20, Powercor, 2014 Category Analysis RIN, Template 5.4 Maximum Demand and Utilisation at Spatial level, refer Table 5.4.1 Non-Coincident & Coincident	Zone substation maximum demand.	Spatial maximum demand	Personal information.	In Table 5.4.1 contains coincident and non-coincident max demands by zone substation. Powercor has 13 entries in this	The information could be market sensitive to the customers who own the zone substations.	There is little public benefit to be obtained in releasing information on customer owned substations, and consequently any

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<p>Maximum Demand.</p> <table border="1" data-bbox="248 651 501 1230"> <tr> <td data-bbox="248 651 501 783">Powercor customer owned zone substations</td> </tr> <tr> <td data-bbox="248 783 501 1230"> IMK CPL SCI/A SCI/B TYA BGF BGL IKA FDN SRC BCG HCP DTN-BNG </td> </tr> </table>	Powercor customer owned zone substations	IMK CPL SCI/A SCI/B TYA BGF BGL IKA FDN SRC BCG HCP DTN-BNG				table for customer owned zone substations. Confidentiality is being claimed to protect specific information which could identify the customer and their load information. The table in the first column identifies the zone subs which are in the Cat RIN Table 5.4.1, which require confidentiality.		detriment is negligible.
Powercor customer owned zone substations								
IMK CPL SCI/A SCI/B TYA BGF BGL IKA FDN SRC BCG HCP DTN-BNG								
PAL CONFIDENTIAL RIN 1.22 Corporate services agreement 2012-2014, pp. 26-102. PAL CONFIDENTIAL RIN 1.23 Corporate services agreement,	Various service agreements contracts between Powercor and its related entities.	PAL PUBLIC RIN 1.21 Powercor, 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	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		

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<p>deed of variation 2014, p. 4.</p> <p>PAL CONFIDENTIAL RIN 1.24 Metering services agreement 2008-2013, pp. 7, 31-37.</p> <p>PAL CONFIDENTIAL RIN 1.25 Metering services agreement, deed of variation 2014, pp. 10-16.</p> <p>PAL CONFIDENTIAL RIN 1.26 Metering services agreement, deed of variation 2015, pp. 9-15.</p> <p>PAL CONFIDENTIAL RIN 1.27 Network services agreement 2012-2014, pp. 32-38.</p> <p>PAL CONFIDENTIAL RIN 1.28 Network services agreement 2015, pp. 4, 7-12.</p> <p>PAL CONFIDENTIAL RIN 1.30 DRMS constitution, pp. 2-26.</p>				<p>infrastructure transactions, such as tender processes (e.g. unit prices).</p>		<p>efficiency of our related party margins.</p>

Source: Powercor

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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	293	26,439	26,732	1%	99%
Models	165	503	668	25%	75%
Reset RIN - templates	3 (tables)	94 (tables)	97 (tables)	3%	97%
Reset RIN – schedule 1 attachments	134	515	649	21%	79%

Source: Powercor

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

Powercor consents to the AER disclosing all Powercor’s non-confidential information on the AER website.