

Confidentiality Claims

2023-28 Revenue Proposal 31 January 2022



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1. Confidentiality Claims

This document sets out Transgrid's confidentiality claims for the 2023-28 Revenue Proposal in accordance with Australian Energy Regulator's Confidentiality Guideline 2017.



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|--|--------------------------|---|--|---|
| 2023-28 Revenue Proposal Section 8.8.1, pg 109, para 1 & Figure 8-11 pg 110 Table 8- 6 rows 1 & 2 Section 8.8.2, pg 111, para 1 & 6 & table 8-7 first column Section 8.8.3, pg 112, para 1 & Table 8-9 first column | Сарех | Land | Strategic information | Public disclosure could potentially harm Transgrid's commercial interests. The dollars in the projects can be used to infer land costs. | Revealing land acquisition forecast cost which is included within the project costs could impact Transgrid's ability to obtain a fair market price for the land. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs passed onto customers. | Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) and there is no public benefit to disclosure. |
| 2023-28 Revenue Proposal Section 18.2, pg 169, para 2 pg 170, Table 18-1 rows 1, 2 and 5 | Unregulated revenue | Unregulated Revenue earned with Shared Assets | Market intelligence | This information would give our Telecommunication competitors detailed revenue information they would not otherwise have access to. | If competitors have access to our forecast revenue information, they will be able to derive the growth assumptions of our Telecommunication business and gain an unfair advantage in a highly competitive market where we wouldn't have the same level | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |



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| | | | | | of information for all our competitors. | |
| RIN workbook 1 – Forecast, template 2.3 Augex (a) Projects Table 2.3.1, cells O13- O327, R13- R327, U13- V327, X13- AA327, AC13- AG327 Table 2.3.2, cells K337- K416, R337- S416, U337- X416, Z337- AD416 | Сарех | Augmentation | Market Sensitive Cost Inputs | Disclosure may provide the ability to determine Transgrid's unit rates for procurement of equipment and installation of assets. | Disclosure may result in suppliers tendering to a set price previously accepted, not their most competitive. | Publication of this information could potentially even be detrimental and result in cost increases that would flow through to higher bills. There is no public benefit to disclosure. |
| RIN workbook 1 – Forecast, template 2.5 Connections Expenditure Table 2.5.1, cells C12-I20, C38-I46 | Capex | Connections | Market Intelligence | Disclosure may provide the ability to determine Transgrid's unit rates for procurement of equipment and installation of assets. | Competitors may not provide best price, only a price that would trump a Transgrid bid. This would be a poor result for the customer. | Publication of this information could potentially even be detrimental and result in cost increases that would flow through to higher bills. There is no public |



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|---|--|---|-----------------------------|---|--|---|
| | | | | | | benefit to disclosure. |
| RIN workbook 1 – Forecast, template 3.1 Revenue Table 3.1.1, cells C15-I16 | Revenue | Revenue - From Fixed Energy Usage Charges (Charge per day basis) TREV0105 Revenue - From Variable Energy Usage charges (Charge per kWh basis) TREV0106 | Other | Disclosure of this information concerning directly connect customers provided market data that may impact their business performance. There is no benefit from disclosing this information. Prudent discount contracts are commercial in confidence. The details are not publically disclosed. There are no benefits from disclosing this information. | Contractual requirement for this information to be held commercial in confidence. | Publication of this information would identify a single directly connected customer's annual revenue. There are no benefits from disclosing this information. |
| RIN workbook 1 – Forecast, template 5.4 Maximum Demand and Utilisation at Spatial Level | Direct Industrial Loads | Direct Industrial Loads | Other | Confidentiality agreements with direct industrial customers | Public disclosure of industrial data beaches confidentiality agreements | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |



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| Table 5.4.1, cells B10-B23, Q10-W23, B332-B345, Q332-W345, B682-B695, Q682-W695 B780-B793, Q780-W793 B1368-B1395, Q1368-W1395 | | | | | | |
| RIN workbook 1 – Forecast, template 7.4 Shared Assets Table 7.4.1, cells G9-S10 & G13-S13 | Unregulated revenue | Unregulated Revenue earned with Shared Assets | Market intelligence | This information would give our Telecommunication competitors detailed revenue information they would not otherwise have access to. | If competitors have access to our forecast revenue information, they will be able to derive the growth assumptions of our Telecommunication business and gain an unfair advantage in a highly competitive market where we wouldn't have the same level of information for all our competitors. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| RIN workbook 8 – Capex historical, | Capex | Tax | Market sensitive cost inputs | The workbooks contain detailed, commercially sensitive tax | Disclosing this information could result in readers misinterpreting | Little public benefit and risk of public misinterpretation of information |



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| template 8.2 Capex Table 8.2.7, cells C10-E43 & C60-E60 | | | | information, which are not public knowledge. | position of expensing these items | |
| RIN Population Model WkB_1_2.3a tab, cells Q10-Q328, Q352-Q671, T10-T328, T352-T671, W10-X328, W352-X671, Z10-AC328, Z352-AC671, AE10-AI328, AE352-AI671 WkB_1_2.3.2 tab, cells M14-M97, M109-M192, T14-U97, T109-U192, W14-Z97, W109-Z192, AB14-AF97, AB109-AF192 | Сарех | Augmentation | Market Sensitive Cost Inputs | Disclosure may provide the ability to determine Transgrid's unit rates for procurement of equipment and installation of assets. | Disclosure may result in suppliers tendering to a set price previously accepted, not their most competitive. | Publication of this information could potentially even be detrimental and result in cost increases that would flow through to higher bills. There is no public benefit to disclosure. |



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| RIN Population Model WkB_1_2.5.1 tab, cells E11- L45, E73- F79, E99-F105 | Capex | Connections | Market Intelligence | Disclosure may provide the ability to determine Transgrid's unit rates for procurement of equipment and installation of assets. | Competitors may not provide best price, only a price that would trump a Transgrid bid. This would be a poor result for the customer. | Publication of this information could potentially even be detrimental and result in cost increases that would flow through to higher bills. There is no public benefit to disclosure. |
| RIN Population Model WkB_1_3.1.1 tab, cells E14- K15 & E33-l34 | Revenue | Revenue - From Fixed Energy Usage Charges (Charge per day basis) Revenue - From Variable Energy Usage charges (Charge per kWh basis) | Other | Disclosure of this information concerning directly connect customers provided market data that may impact their business performance. There is no benefit from disclosing this information. Prudent discount contracts are commercial in confidence. The details are not publically disclosed. There are no benefits | Contractual requirement for this information to be held commercial in confidence. | Publication of this information would identify a single directly connected customer's annual revenue. There are no benefits from disclosing this information. |



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| | | | | from disclosing this information. | | |
| RIN Population Model WkB_1_7.4 tab, cells l10- U11, l14-U14, l52-U53 & l56- U56 | Unregulated revenue | Unregulated Revenue earned with Shared Assets | Market intelligence | This information would give our Telecommunication competitors detailed revenue information they would not otherwise have access to. | If competitors have access to our forecast revenue information, they will be able to derive the growth assumptions of our Telecommunication business and gain an unfair advantage in a highly competitive market where we wouldn't have the same level of information for all our competitors. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| RIN Population Model WkB_8_8.2.7 tab, cells E11- G44, E60-G60, E62-G62 | Capex | Tax | Market sensitive cost inputs | The workbooks contain detailed, commercially sensitive tax information, which are not public knowledge. | Disclosing this information could result in readers misinterpreting position of expensing these items | Little public benefit and risk of public misinterpretation of information |
| Capex model Forecast_Cape x_Input tab, cells V157- AA157, CJ157- | Capex | Land | Strategic information | Public disclosure could potentially harm Transgrid's commercial interests. The dollars in the | Revealing land acquisition forecast cost which is included within the project costs could | Publication of this information would be harmful (and result in potential cost increases that |

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| CK157, V171- AA171 & CJ171-CK171 Contin_Proj_In put tab, cells I11, K11-Q11, S11, V11- AB11, AD11, I25, K25-Q25, S25, V25- AB25,-AD25 Capex_Forecas t tab, cells AG379-AL386, AU379-AZ386, BB379-BG386, BI379-BN386, BP379-BN386, BP379-BN386, CG379-CH386, CJ379-CA386, CG379-CH386, CJ379-CO386, CG379-CV386, CJ379-CV386, CJ379-CV386, CJ379-CV386, CJ379-CO386, CJ379-CV386, CJ379-CO386, CJ379-CV386, CJ379-CS386, | | | | projects can be used to infer land costs. | impact Transgrid's ability to obtain a fair market price for the land. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs passed onto customers. | would flow through to higher bills) and there is no public benefit to disclosure. |



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| BV431-CA432, CC431-CH432, CJ431-CO432, CQ431-CV432, CX431-DC432, ED431-EE432 Project_Output s tab, cells O153-T153, V153-AA153, O167-T167, V167-AA167 | | | | | | |
| Capex model Forecast_Cape x_Input tab, cells V167- AA168, CJ167- CK168 Capex_Forecas t tab, cells AG419-AL424, AN419-AS424, BB419-BG424, BI419-BN424, BP419-BN424, BP419-BT424, BV419-CA424, CC419-CH424, CJ419-CO424, CQ419-CV424, | Capex | Connections | Market Intelligence | Disclosure may provide the ability to determine Transgrid's unit rates for procurement of equipment and installation of assets. | Competitors may not provide best price, only a price that would trump a Transgrid bid. This would be a poor result for the customer. | Publication of this information could potentially even be detrimental and result in cost increases that would flow through to higher bills. There is no public benefit to disclosure. |



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| CX419-DC424, ED419-EE424 | | | | | | |
| RIN_Outputs tab, cells J51- O56, J64-O69, J75-O80 | | | | | | |
| Project_Output s tab, cells O163-T164, V163-AA164 | | | | | | |
| Rate of Return Model | Capex | Rate of return | Market intelligence | Public disclosure could potentially | Public disclosure could potentially | We are not aware of any public |
| Cover tab, cells C33-X33 | | | | harm Transgrid's and the third-party's commercial interests with the disclosure of | harm Transgrid's and the third-party's commercial interests | benefit in publicly disclosing this information that could outweigh the |
| Input_Data tab, cells J65-K84 | | | | | | |
| Calc_Returns tab, cells J79- K98, M79-O98 | | | | BVAL Bloomberg series | | detriment |
| 2023-28 RIN Basis of Preparation | Capex | Tax | Market sensitive cost inputs | It contains detailed, commercially sensitive tax | Disclosing this information could result in readers | Little public benefit and risk of public misinterpretation of |
| Section 5.4.1, pg. 40 & 41 | | | | information, which are not public knowledge. | misinterpreting position of expensing these items | information |
| Opex Step Change | Opex | Insurance | Market sensitive cost inputs | Public disclosure could potentially harm TransGrid's | Public disclosure could potentially harm TransGrid's | We are not aware of any public benefit in publicly |



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| Overview Paper Section 3.3, pg 8, para 3 Section 3.3, pg 8, Table 3-2 Section 3.5, pg 9, para 3 Section 3.5, pg 10, Table 3-4 | | | | and the third-party's commercial interests | and the third-party's commercial interests | disclosing this information that could outweigh the detriment. |
| Opex Step Change Overview Paper Table of contents, pg 2, Table 4-3 Section 4.2, pg 11, para 6 Section 4.4, pg 13, para 1, Pg 13 & 14, Table 4-3 pg 14, para 1&2, pg 14 & 15, Table 4-4 Section 4.5, pg 15, para 1 & 3 | Opex | Security status - Current security state and planned future activity | Information affecting the security of the network | Public disclosure could potentially be used by an attacker to target Transgrid | An attacker could disrupt network and/or corporate operations | There is no public benefit in disclosing status of security controls |



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| pg 15 & 16, Table 4-5 pg 16, para 1, pg 16 & 17, Table 4-6 | | | | | | |
| Opex Step Change Overview Paper Section 2.4, pg 5, para 2, pg 6, para 1 | Орех | Forecasted security expenditure | Strategic information | Could harm the security posture of the company | Disclosing our investments and year on year investment profile for security may allow potential timed activities based on this knowledge of when activities are occurring | There is no public benefit in disclosing expenditure. |
| Opex Step Change Overview Paper Section 5.5, pg 20, para 1 | Орех | Step Change - ISP | Market sensitive cost inputs | Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs | Public disclosure of contractor costs for particular types of materials or services could harm Transgrid's business interests and ultimately increase costs passed onto customers. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |



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| | | | | passed onto customers | | |
| Augex Overview Paper Section 5 Key messages, pg 27, dot point (dp) 2 & 3 Section 5.1, pg 28, Table 5-1 and dp 1 Pg 29, dp 5; Section 5.2, pg 30, dp 1 Section 5.2, pg 30, dp 1 Section 5.5, pg 38, para 4 Section 5.5, pg 38, para 2 Attachment 2, pg 85, Table A2-1 pg 86, Table A2-2 pg 86, Figure A2-1 pg 87, Table A2-3 | Сарех | Land | Strategic information | Public disclosure could potentially harm Transgrid's commercial interests. The dollars in the projects can be used to infer land costs. | Revealing land acquisition forecast cost which is included within the project costs could impact Transgrid's ability to obtain a fair market price for the land. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs passed onto customers. | Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) and there is no public benefit to disclosure. |



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| pg 88, Table A2-3 | | | | | | |
| pg 91, Table A2-4 | | | | | | |
| pg 94, Table A2-6 | | | | | | |
| Augex Overview Paper Section 5.4.3, pg 36, para 2 Section 5.4.4, pg 36, para 2 Section 5.4.5, pg 37, para 2 | Capex | Transmission line | Information affecting the security of the network | Public disclosure, may jeopardise the security of the network. | Public disclosure may harm the security of the network for customers if the information is used with malicious intent | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |
| Augex Overview Paper Section 5.2.5, pg 33, para 1 | Loads | Spot load information | Other | Does not fit into the other categories as is to do with spot load data and timing thereof | Public disclosure of the spot load data and timing thereof could potentially harm the third- party's commercial interests | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |
| Non-network ICT Overview Paper Section 4, pg.15, Key messages | Capex | ICT | Information affecting the security of the network | Specific information on our systems and cybersecurity initiatives | Details on our core systems and security initiatives if made public pose a security risk | Possible security impact if known publicly as it discloses our security readiness and activities as |



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| | | | | | | well as our core systems |
| Non-network ICT Overview Paper Section 4.2.1, pg.16, dot point (dp) 1 - 5, Pg. 17, dp 2 - 4 | Capex | ICT | Information affecting the security of the network Market sensitive cost inputs | Details our core systems that we do not want to make public. | Security concerns around being able to target vulnerabilities if our current systems and tools are known | Security concerns around being able to target vulnerabilities if our current systems and tools are known |
| Non-network ICT Overview Paper Section 4.2.2, pg.17, dp 1 -3 | Capex | ICT | Information affecting the security of the network | Provides details of our security initiatives and what has been implemented | Security concerns around being able to target vulnerabilities if our current systems and tools are known | Security concerns around being able to target vulnerabilities if our current systems and tools are known |
| Non-network ICT Overview Paper Section 4.2.4, pg.18, dp 1 – 2 | Capex | ICT | Information affecting the security of the network | Details specific infrastructure components that we do not want made public | Security concerns around being able to target vulnerabilities if our current systems and tools are known | Security concerns around being able to target vulnerabilities if our current systems and tools are known |
| Non-network ICT Overview Paper Section 5.1, pg.20, Table 5- | Capex | ICT | Information affecting the security of the network | Breakdown of yearly spend forecast for Infrastructure and Network and Security | Concerns around disclosing our yearly spend profile will increase | The full totals are still available publicly. The individual years are redacted out of |



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| 1 ICT by category | | | | | | concern the disclosing will reveal too much about our security and infrastructure investment that can be used to time attacks onto our networks. |
| Non-network ICT Overview Paper Section 5.1.2, pg.21, para 2 | Сарех | ICT | Information affecting the security of the network | Details our current security gaps in our infrastructure | Security issues about exposing security gaps in our infrastructure | This information leaves us vulnerable to security breaches that will affect consumers |
| Non-network ICT Overview Paper Section 5.1.3, pg.21, para 2 | Capex | ICT | Information affecting the security of the network | Details our current security gaps in our bespoke applications | Security issues about exposing security gaps in our bespoke applications | This information leaves us vulnerable to security breaches that will affect consumers |
| Non-network ICT Overview Paper Section 5.1.6, pg.23, dp 1 | Сарех | ICT | Market sensitive cost inputs | Identifies our preferred solution and vendor | Commercial negotiation has not occurred yet. | This information leaves made public may limit us in negotiations with the preferred vendor and result in higher costs |



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| Non-network ICT Overview Paper Section 5.1.7, pg.23, para 3 | Capex | ICT | Market sensitive cost inputs | Identifies our preferred solution and vendor | Commercial negotiation has not occurred yet. | This information leaves made public may limit us in negotiations with the preferred vendor and result in higher costs |
| Non-network ICT Overview Paper Section 5.1.8, pg.23, para 2 | Capex | ICT | Information affecting the security of the network | Details our current security gaps and our current security rating assessment | Security issues about exposing security gaps and ratings maturity assessment | This information leaves us vulnerable to security breaches that will affect consumers |
| Non-network ICT Overview Paper Attachment 2, pg.43, Table A2-6 Infrastructure and Network Description, Objectives and deliverables, Principal reasons for expenditure | Сарех | ICT | Information affecting the security of the network | Details the current security issues present in our infrastructure and network | Security issues about exposing security gaps in our infrastructure | This information leaves us vulnerable to security breaches that will affect consumers |
| Non-network ICT Overview Paper | Capex | ICT | Market sensitive cost inputs | Identifies our preferred solution and vendor | Commercial negotiation has not occurred yet. | This information leaves made public may limit us in |



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| Attachment 2, pg.44, Table A2-7 Operational Evolution Description | | | | | | negotiations with the preferred vendor and result in higher costs |
| Non-network ICT Overview Paper Attachment 2, pg.44-45, Table A2-8 Cyber Security Description | Capex | ICT | Information affecting the security of the network | Details our current security gaps and our current security rating assessment | Security issues about exposing security gaps and ratings maturity assessment | This information leaves us vulnerable to security breaches that will affect consumers |
| Insurance Premium Cost Forecast Executive Summary, pg.1, graph pg 2 & 3, key drivers column for rows 2-5 pg 4, table 1 Section 1.5, pg 6, references 3 & 4 Section 2.1, pg. 7, Table 2 | Орех | Insurance | Market sensitive cost inputs | Public disclosure could potentially harm Transgrid's and the third-party's commercial interests | Public disclosure could potentially harm Transgrid's and the third-party's commercial interests and ultimately increase costs passed onto customers | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |



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| Section 2.2, pg.8, first 3 columns Section 4.4.1, pg 34, para 1 | | | | | | |
| Section 4.4.2, pg 34, para 1 & graph | | | | | | |
| pg 35, para 1 & 2, graph | | | | | | |
| Section 4.4.3, pg 35, para 1 & 2 | | | | | | |
| Section 4.4.4, pg 36 table | | | | | | |
| Appendix 1, pg.38 – 42 all tables | | | | | | |
| Insurance Premium Cost Forecast | Opex | Insurance | Market intelligence | Public disclosure could potentially harm Transgrid's and | Public disclosure could potentially harm Transgrid's | We are not aware of any public benefit in publicly |
| Section 4.1.1, pg 16, para 1 | | | | the third-party's commercial interests | and the third-party's commercial interests | disclosing this information that |
| Section 4.1.2, pg 16, para 1 & graph | | | | with the disclosure of market analysis undertaken by Aon | and impair Transgrid's relationship with Aon | could outweigh the detriment |
| pg 17, graph & para 1, 3 & 4 | | | | | | |



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| Section 4.1.5, | | | | | | |
| pg 18, para 1 | | | | | | |
| Section 4.1.6, pg 19, para 1, 4, 9 | | | | | | |
| Section 4.1.7, pg 21 table | | | | | | |
| Section 4.2.1, pg 22, para 1 & 2 | | | | | | |
| Section 4.2.2, pg 22, para 1 & 2 & graph | | | | | | |
| Section 4.2.3, pg 23, para 1 | | | | | | |
| Section 4.2.6, pg 24, para 1 & 2 | | | | | | |
| Section 4.2.8, pg 25 table | | | | | | |
| Section 4.3.1, pg 26, bullet point 2, 5, 7 and para 2 | | | | | | |
| Section 4.3.2, pg 26, para 1 and graph | | | | | | |
| pg 27, para 1 and graph | | | | | | |



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| Section 4.3.3, pg 27 para 1-3 and graph Section 4.3.3.2, pg 28, para 1 & 3 pg 29, para 1 Section 4.3.3.3, pg 29, para 3 Section 4.3.4, pg 29, para 1, & 2 Section 4.3.5, pg 30, para 1 & 2 Section 4.3.5.1, pg 30, para 1 Section 4.3.6, pg 33 table | | | | | | |
| Insurance Premium Cost Forecast Appendix 2, pg 47 Appendix 3, pg 85, 105, 106 | Opex | Insurance | Personal information | Information identifies specific employees of AON | These AON employees may be directly and improperly approached by external parties | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |
| Demand Driven Augex | Direct Industrial Loads | Direct Industrial Loads | Other | Confidentiality agreements with | Public disclosure of industrial data beaches | We are not aware of any public benefit in publicly |



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|---|--|---------------------------------------|-----------------------------|---|---|--|
| Forecast Review Executive summary, pg ii, Table 1 row 4 | | | | direct industrial customers | confidentiality agreements | disclosing this information that could outweigh the detriment |
| Section 2.1.2, pg 7, Figure 4 Section 2.2, pg 8, Figure 5, pg 9, Figure 6 Section 2.3.1, pg 10, Figure 7 Section 2.3.2, pg 11, Figure 8 Section 2.3.4, pg 13, Figure 10 Section 2.4, pg | | | | | | |
| 14, Figure 11 Section 2.6, pg 17, Figure 14 | | | | | | |
| Point Load Study Section 2, pg 1, both tables, pg 2, all tables | Loads | Spot load information | Other | Does not fit into the other categories as is to do with spot load data and timing thereof | Public disclosure of the spot load data and timing thereof could potentially harm the third- party's commercial interests | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |



| Title, page and paragraph number (i.e. section and page number) Section 4 | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|--|--|--|
| Appendix, pg 5&6 | | | | | | |
| Nominated Averaging Period Section 1.1, pg 2 Section 1.2, pg 2 & 3 | Capex | Rate of return | Market sensitive cost inputs | Information identifies the business debt data averaging periods for the 2023-28 regulatory period. Further, the information is deemed to be confidential under the AER's 2018 Rate of Return Instrument. | The averaging period is used to transact hedging transactions in the financial markets. Financial market participants could utilise this information to influence market pricing that could have an adverse impact on Transgrid's hedging transactions during these periods. | Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) to the long term interest of consumers. Further, there is no public benefit from the disclosure of this information. |
| OER-1473 Rev 4 Executive summary, pg 2, para 2 Section 1, pg 3, para 7, pg 4, Figure 1 Section 3.2, pg 5, para 2&4, | Capex | Transmission line | Information affecting the security of the network | Public disclosure may jeopardise the security of the network. | Public disclosure may harm the security of the network for customers if the information is used with malicious intent | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|---------------------------------------|--|---|---|--|
| pg 6, para 2 and footnote 6 Appendix B.3, pg 12, first column of table | | | | | | |
| OER-1491 Rev 4 Executive summary, pg 2, para 2 Section 1, pg 3, para 7, pg 4, Figure 1 Section 3.2, pg 5, para 2 Appendix B.3, pg 12, para 4 & first column of table pg13, first column of table | Capex | Transmission line | Information affecting the security of the network | Public disclosure may jeopardise the security of the network. | Public disclosure may harm the security of the network for customers if the information is used with malicious intent | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |
| OER-1522 Rev 4 Executive summary, pg 2, para 2 Section 1, pg 3, para 7, | Capex | Transmission line | Information affecting the security of the network | Public disclosure may jeopardise the security of the network. | Public disclosure may harm the security of the network for customers if the information is used with malicious intent | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
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| pg 4, Figure 1 Section 3.2, pg 5, para 2, pg 6, para 2 Appendix B.3, pg 12, para 1 & first column of table | | | | | | |
| OER-1687 Rev 4 Executive summary, pg 2, Table 1 & footnote 4 Section 3.2, pg 7, Table 2 Appendix A, pg 14, rows 12 & 13 of table | Capex | Land | Strategic information | Public disclosure could potentially harm Transgrid's commercial interests. The dollars in the project can be used to infer land costs. | Revealing land acquisition forecast cost which is included within the project cost could impact Transgrid's ability to obtain a fair market price for the land. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs passed onto customers. | Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) and there is no public benefit to disclosure. |
| OER-1698 Rev 2 Executive summary, pg 2, para 2 | Loads | Spot load information | Other | Does not fit into the other categories as is to do with spot load data and timing thereof | Public disclosure of the spot load data and timing thereof could potentially harm the third- | We are not aware of any public benefit in publicly disclosing this information that |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|---------------------------------------|--------------------------|---|---|---|
| Section 1, pg 4, para 4 & 5 pg 5, para 2 | | | | | party's commercial interests | could outweigh the detriment |
| and Table 2, | | | | | | |
| pg 6, Figure 2 | | | | | | |
| Section 4.1, pg 12, Table 6 | | | | | | |
| DER-2137 Rev 2 Executive summary, pg 2, Table 1 and para 10 Section 3.1, pg 4, para 4, 5 & 6 Section 3.2 pg 5, para 2,4 & 5 pg 6, Table 2 and para 1 Section 4.1, pg 6, Table 3 and para 3, | Сарех | Land | Strategic information | Public disclosure could potentially harm Transgrid's commercial interests | Revealing land acquisition forecast cost could impact Transgrid's ability to obtain a fair market price for the land. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs passed onto customers. | Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) and there is no public benefit to disclosure. |
| pg 7, Table 4 Section 4.2, pg 7, Table 5 & para 2 | | | | | | |
| Section 4.3, pg 7, para 3 & 5 | | | | | | |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|---------------------------------------|--------------------------|---|---|---|
| Section 5, pg 8, para 2 & 3, bullet points 1 & 2, Figure 2, footnote 1 Section 6, pg 8, para 1 Appendix A, pg 9 rows 7, 10 & 11 of table | | | | | | |
| Property Value Forecast Background & Scope, pg 5, para 1, 2, 3, 5 and table Proposed Transmission Line, pg 6, para 1-2, table and figure pg 7, figure and para 1 Underlying Common Drivers of Growth, pg 12, table Hobby Farm | Capex | Land | Strategic information | Public disclosure could potentially harm Transgrid's commercial interests | Revealing land acquisition forecast growths and localities could impact Transgrid's ability to obtain a fair market price for the land. Disclosure could therefore harm Transgrid's commercial interests and ultimately increase costs passed onto customers. | Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) and there is no public benefit to disclosure. |



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|---|--|---------------------------------------|--|---|--|---|
| Residential, pg 15, Table under Localised Observations | | | | | | |
| Industrial, pg 16, Tables under Localised Observations | | | | | | |
| Residential, pg 17, Tables under Localised Observations | | | | | | |
| Potential for Growth in Excess of Historic Rates, pg 19, para 1 | | | | | | |
| Forecast Observations, pg 21, para 1-4 & 6-9 | | | | | | |
| OER - Infrastructure and Network Executive Summary, pg 2, para 2 & 3 | Capex | ICT | Information affecting the security of the network | Public disclosure will show that the infrastructure is vulnerable with certain components that are past end of life. The example given provides details of what needs | It will allow these components that are end of life and out of date be targeted for hacking. | Disclosure will identify component of infrastructure operating at end of useful life and allow it to be exploited to gain access to our infrastructure network. |



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|---|--|---------------------------------------|---|--|--|--|
| | | | | to be mitigated from a security standpoint. | | |
| OER - Infrastructure and Network Executive Summary, pg 2 & 3, Evaluated options table | Capex | ICR | Market sensitive cost inputs | Internal labour overhead costs disclosed | Internal labour overhead costs disclosed | Disclosure will harm our commercial interest if our internal costs are known |
| OER - Infrastructure and Network Section 1.1 pg 4, Para 2 & 3 | Capex | ICT | Information affecting the security of the network | The example shown details an actual security incident that occurred. | The example details a recent security incident and disclosing it publicly will impact our ability to stop bad actors attempting to bring down our network and consumer confidence in the industry. | Public disclosure will allow bad actors to understand how to bring down external access to our network. |
| OER - Infrastructure and Network Section 1.1.1 pg 4, para 2 & 3 | Capex | ICT | Information affecting the security of the network Market sensitive cost inputs | Identifies current and future vulnerability in particular applications and details the commercial cost of outages to our environment | By identifying the vulnerable application, outside parties would be able to identify the coming unsupported application we are using to exploit | This text identifies the vulnerability that is able to be exploited in our systems and provides an estimated commercial impact |



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|--|--|---------------------------------------|--|--|--|---|
| OER - Infrastructure and Network Section 3.1 pg 7 & 8, para 3, 5, Table 3.1 | Capex | ICT | Information affecting the security of the network | It details the current support gaps in our infrastructure that is vulnerable and needs replacement. The table shows the asset categories that require replacement and the impacts to Transgrid if this does not occur | These components can be targeted if this information is disclosed. These security vulnerabilities need to be remediated. | Vulnerabilities in our infrastructure if known, can be targeted to gain access to our infrastructure and bring down services, held for ransom and impact the safety of our staff and customers. |
| OER - Infrastructure and Network Section 3.1.2 pg 9, Risk Assessment table | Capex | ICT | Information affecting the security of the network | This risk assessment table shows our internal risk assessment of vulnerabilities to our infrastructure | This table shows the risk assessment of our current capability gaps as defined by this option. | Vulnerabilities in our infrastructure if known, can be targeted to gain access to our infrastructure and bring down services, held for ransom and impact the safety of our staff and customers. |
| OER - Infrastructure and Network Section 3.2, pg 9, para 2 | Capex | ICT | Information affecting the security of the network | The paragraph details a specific example of where we are going to deploy the solution for a proof of concept | The disclosure of specific security implementations should not be made public | Vulnerabilities in our infrastructure if known, can be targeted to gain access to our infrastructure and bring down |



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|--|--|---------------------------------------|--|--|---|---|
| | | | | | | services, held for ransom and impact the safety of our staff and customers. |
| OER - Infrastructure and Network Section 3.3 pg 10 & 11, Table Options considered but not progressed | Сарех | ICT | Information affecting the security of the network | This table identifies that there are end of life assets in the environment and which ones are or will be obsolete and replacement strategies | The identification and disclosure of end of life assets should not be made public in order for them not to be targeted by bad actors. | Vulnerabilities in our infrastructure if known, can be targeted to gain access to our infrastructure and bring down services, held for ransom and impact the safety of our staff and customers. |
| OER - Infrastructure and Network Section 5.1, pg. 13, Estimated capital costs table | Capex | ICT | Market sensitive cost inputs | Breakdown of our materials and labour | Commercially sensitive. Vendor negotiations not complete. | Commercially sensitive. Breakdown of our labour and materials estimates made public may affect our negotiations with vendors |
| OER - Infrastructure and Network | Opex | ICT | Market sensitive cost inputs | Internally self-funded opex. | Commercial in confidence. These numbers represent our own internal | Commercial in confidence. These figures are Transgrid's own |



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|---|--|---------------------------------------|--|---|---|---|
| Section 5.2, pg. 13, Estimated opex step change table | | | | | funding to support this initiative. | internal funding figures. |
| OER - Infrastructure and Network Appendix, Pg. 14 | Capex | ICT | Information affecting the security of the network | In the appendix, we catalogue and describe the infrastructure assets requiring replacement and the dates that they will be end of life. At this point, they will no longer be supported nor receive security patch updates. | The appendix table identifies each component that someone can target to gain access or bring down our infrastructure network and when this equipment will reach end of life | Vulnerabilities in our infrastructure if known, can be targeted to gain access to our infrastructure and bring down services, held for ransom and impact the safety of our staff and customers. |
| OER- Employee Enablement Executive summary, pg. 3, Options table | Capex | ICT | Market sensitive cost inputs | Details our internal corporate overhead costs | Commercially sensitive information detailing our internal overhead costs | Commercially sensitive financial information relating to our internal network and corporate overheads |
| OER- Employee Enablement Section 1.1.2, Pg. 5, Point 3 and Footnote reference | Capex | ICT | Information affecting the security of the network | The product being referred to is already at the end of life and it details current security vulnerabilities. | The paragraph describes the application already at end of life. If known, intruders can target this vulnerability. | Application identified has known vulnerabilities that outsiders can target if this is known. |



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|--|--|---------------------------------------|--|--|---|--|
| OER- Employee Enablement Section 4.1, Pg. 14, Commercial Evaluation table Section 5.1, Pg. 15, Estimated capital costs table Section 5.2, Pg. 15, Opex step change table | Орех | ICT | Market sensitive cost inputs | This is the internal amount that we are funding ourselves from an opex perspective for this initiative | Commercial in confidence amounts | Our own internal costs and subscription rates that we are funding ourselves outside of the request to the regulator |
| OER- Application Maintenance Executive summary, pg 2, Options table | Capex | ICT | Market sensitive cost inputs | Table discloses our internal labour overhead amounts | Commercial in confidence. Will put us at a disadvantage if vendors and competitors know our internal burden costs. | Commercial in confidence. Will put us at a disadvantage if vendors and competitors know our internal burden costs. |
| OER- Application Maintenance Section 2.2, Pg.5, Examples in table | Capex | ICT | Information affecting the security of the network | Specific examples of our applications under each category. | Identifies specific systems and software that we use. External parties can identify vulnerabilities in that particular software if known. | Examples are some core systems that we use to manage critical functions. The public doesn't need to know specific applications that fall |



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|--|--|---------------------------------------|--|---|--|--|
| | | | | | | under these categories. |
| OER- Application Maintenance Section 5.1, pg.12, Estimated capital costs table | Capex | ICT | Market sensitive cost inputs | The estimated capital costs shows the breakdown into materials, labour and our network and corporate overhead rates | Commercially sensitive information on our internal rates | Discloses our internal overhead costs publicly. It is commercially sensitive |
| OER- Application Maintenance Section 5.2, pg.12, Estimated opex step change table | Opex | ICT | Market sensitive cost inputs | Table discloses our internal labour overhead amounts; discloses our internal self-funded opex amounts | Discloses commercial in confidence amounts and breakdowns for capex and the opex that we are self- funding | Commercial in confidence information that may put us at a disadvantage if made public |
| OER-Bespoke Application Executive summary, Pg.2, Para 2 | Capex | ICT | Information affecting the security of the network | Details capability gaps in compliance and security in testing procedure that we need to remediate | Known compliance and security capability gaps that we intend to remediate | If made public, these areas can be targeted by external parties to gain access to our network |
| OER-Bespoke Application Executive summary, Pg.3, | Capex | ICT | Market sensitive cost inputs | Details our internal labour corporate overheads | Our internal overhead calculations can be determined if this | These are our internal overhead costs which are commercial in confidence |



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|---|--|---------------------------------------|---|--|---|---|
| Evaluated options table | | | | | information is made available | |
| OER-Bespoke Application Section 1.1.1.1, Pg.4, Para 4, 5 and footnote | Capex | ICT | Information affecting the security of the network | Details our underlying application code base that is used for our bespoke applications. Footnote identifies the code base versions and end of life expectations. | Describes our current issues with the application code base, the concerns around security and our internal support levels | Vulnerabilities in our existing code base can be targeted if the platform we use is made public |
| OER-Bespoke Application Section 1.1.1.2, Pg.4, para 1, 2 | Capex | ICT | Information affecting the security of the network Strategic information | Details the current capability gaps in our testing environments and results and recommendations of internal capability assessments. | The comments disclose our challenges today in testing capability and recommendations that we plan to put in place as part of this request | These gaps can be exploited by external parties to gain access to our environment. |
| OER-Bespoke Application Section 1.2, Pg.5, Compliance bullet point and footnote | Capex | ICT | Information affecting the security of the network Strategic information | Identifies our applications used to meet compliance. | Identifies the usage of bespoke applications for our compliance obligations. | Public should not be made aware of internal applications to meet compliance and the statement about bespoke applications being a greater security risk. The more general comment |



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| | | | | | | that remains will give the public the same understanding without specific examples. |
| OER-Bespoke Application Section 3.1, Pg.7, para 1 and footnote | Capex | ICT | Information affecting the security of the network Strategic information | Remove reference to appendix A which details all our bespoke applications, their platform and versions. Footnote refers to specific application by name | This details the exact applications, software and platforms that are security risks | This will disclose our bespoke system security vulnerabilities. |
| OER-Bespoke Application Section 3.1.1, Pg.8, para1 | Capex | ICT | Market sensitive cost inputs | Details the previous underspend in upgrading our bespoke applications and providing an exact dollar figure. | Details the current underspend in bespoke. We need to go to market so we do not want vendors to know about this in negotiations | Vendors may want to increase cost for replacement bespoke solutions if they know we have no other option but to refresh. |
| OER-Bespoke Application Section 3.2, Pg.9, para 1 | Capex | ICT | Information affecting the security of the network Strategic information | References to Appendix A where list our bespoke application details have been redacted. | This details the exact applications, software and platforms that are security risks | This will disclose our bespoke system security vulnerabilities. |



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|--|--|---------------------------------------|--|---|---|---|
| OER-Bespoke Application Section 3.3, Pg.11, Do Nothing Approach para 1, 2 | Capex | ICT | Information affecting the security of the network Strategic information | Identifies the functions that our bespoke applications perform and vulnerabilities in our test environment | Can be targeted by external parties to disrupt critical functions that support our transmission business | Discloses our bespoke application functions that support the transmission business |
| OER-Bespoke Application Section 5.1, Pg.15, Estimated capital costs table | Capex | ICT | Market sensitive cost inputs | The estimated capital costs shows the breakdown into materials, labour and our network and corporate overhead rates | Commercially sensitive information on our internal rates | Discloses our internal overhead costs publicly. It is commercially sensitive |
| OER-Bespoke Application Section 5.2, Pg.15, Estimated opex step change table | Opex | ICT | Market sensitive cost inputs | Discloses our opex step change that is self-funded | Confidential opex numbers. We are funding this ourselves and not with public funds. | We are not asking for funding from the AER for opex. These disclose our internally funded opex step change numbers |
| OER-Bespoke Application Appendix A, Pg.16-20 | Capex | ICT | Information affecting the security of the network Strategic information | The appendix lists all our bespoke applications, their function, the underlying code platform, vulnerabilities, etc | It details all the bespoke application details including code base that can be targeted by external parties through their vulnerabilities | The publishing of the appendix will provide sufficient details that can be used by external parties to target Transgrid |



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|---|--|---------------------------------------|---|---|---|--|
| OER- Operational Evolution Executive summary, Pg.2 para 3, 6 | Capex | ICT | Information affecting the security of the network Market sensitive cost inputs | Identifies date product will be out of support (security risk). Identifies targeted solution. | Security risk from identification of out of support application. The targeted solution has not been negotiated with vendor yet. By detailing our preferred solution, will impact commercial negotiations. | Security risk of identifying out of support software. Detriment to public by disclosing preferred vendor may result in increased costs and ultimately increase costs passed onto customers |
| OER- Operational Evolution Executive summary, Pg.3, Options assessed table | Capex | ICT | Market sensitive cost inputs | Internal labour overhead information | Internal overhead costs are confidential to transgrid | Internal overhead labour costing information not for public knowledge |
| OER- Operational Evolution Section 1.1, Pg.4, para 4 Section 1.2.1, Pg. 4, para 1 and second bullet point | Capex | ICT | Information affecting the security of the network | Identifies that our current PPM solution is out of support | This makes it vulnerable to hackers or parties that want to exploit vulnerabilities in the software | Risk of intrusion to our network from external parties |



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|---|--|---------------------------------------|--|---|---|---|
| OER-Operational Evolution Section 1.2.2, pg.5, para 1 Section 1.2.2.1, Pg.5, para 1 & 2 | Capex | ICT | Information affecting the security of the network | Security risk with the identification of expired vendor support for the current product and the interfaces to other applications and their support expiry | Security vulnerability that can be exploited due to product being unsupported. We don't want to publicly disclose this. | Risk of intrusion to our network from external parties |
| OER- Operational Evolution Section 1.2.2.2, Pg.5, para 1 | Capex | ICT | Information affecting the security of the network | Identifies deficiencies and details outage incidents that have occurred and our current workarounds. | These wilnerabilities can be exploited by external parties to gain access to the network. | Risk of intrusion to our network from external parties. We shouldn't be publicly disclosing deficiencies in our applications. |
| OER- Operational Evolution Section 1.2.2.4, Pg.6, bullet points 1,3 | Capex | ICT | Information affecting the security of the network | Identifies support expiration and that the current system suffers from system outages. | These wilnerabilities can be exploited by external parties to gain access to the network. | Risk of intrusion to our network from external parties. We shouldn't be publicly disclosing deficiencies in our applications. |
| OER- Operational Evolution Section 1.2.3.1, Pg.6, para 3 & 5 | Capex | ICT | Strategic Information; Market Sensitive cost inputs | Identifies the preferred product that we want to move to in various paragraphs. | As contracts have not been negotiated, we do not want to publicly identify what we have chosen. | Commercial discussions are still to take place. If the vendor knows that they have been selected, it may lead to higher |



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|---|--|---------------------------------------|---|---|--|---|
| | | | | | | prices and increase costs passed onto customers |
| OER- Operational Evolution Section 1.2.3.2, Pg.6, para 1 & 2 | Capex | ICT | Strategic Information Market sensitive cost inputs | Details specific example with our partner. Identifies that the proposed application be used as a contractual obligations. | As contracts have not been negotiated, we do not want to publicly identify what we have chosen. | Commercial discussions are still to take place. If the vendor knows that they have been selected, it may lead to higher prices and increase costs passed onto customers |
| OER- Operational Evolution Section 1.2.4, Pg.7, para 1 and bullet point 1 | Capex | ICT | Information affecting the security of the network | Identifies other systems that are outdated and unsupported platform. Identifies key limitations of product | Disclosing limitations and unsupported application enables external parties to be able to target these wilnerabilities | Security concerns around the targeting of these vulnerabilities to gain unauthorised access to our network |
| OER- Operational Evolution Section 1.3.1, Pg.7, para 2 | Capex | ICT | Information affecting the security of the network | Identifies the components and platforms of our Digital Core | This details all our current Digital Core cloud based systems and what they do | Security concerns around the targeting of these environments |
| OER- Operational Evolution | Capex | ICT | Information affecting the security of the network | Identifies our current cloud solutions. | Disclosing this information can enable target these environments | Security concerns around the targeting of these environments |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
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| Section 1.3.2, Pg.7 & 8, para 2 and bullet point 1 | | | | | | |
| OER- Operational Evolution Section 1.3.2, Pg.8, para 2, Reference to Appendix | Capex | ICT | Information affecting the security of the network | The statement refers to the appendix which we cannot make public as it contains a case study detailing our current platform | Disclosing this information can enable target these environments | Security concerns around the targeting of these environments |
| OER- Operational Evolution Section 3.1, Pg. 10, bullet point 2 | Capex | ICT | Information affecting the security of the network | Identifies that we have unsupported software and security and operational risk | Identifies that we have unsupported software and security and operational risk | Security concerns around the targeting of these environments since we are identifying exactly what they are and vulnerabilities. |
| OER-Operational Evolution Section 3.1.1, Pg.10, para 2 Pg.11, bullet points 3 & 4 | Capex | ICT | Strategic Information | Identifies our own internal costs of the current workarounds that we use. | Internal labour rates disclosed. | Commercial in confidence internal labour rates |
| OER- Operational Evolution | Capex | ICT | Strategic Information | Identifies proposed solution in mitigation column. | Commercial in confidence since proposed solution | Commercial discussions are still to take place. If the |



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|---|--|---------------------------------------|---|--|--|---|
| Section 3.1.2, Pg.11, Risk assessment table | | | | | has not been commercially negotiated yet. | vendor knows that they have been selected, it may lead to higher prices and increase costs passed onto customers |
| OER- Operational Evolution Section 3.2, Pg.12, para 1 & 2 | Capex | ICT | Information affecting the security of the network Strategic Information | Identification of our proposed replacement application. Identification of our Integration platform | Commercial in confidence since proposed solution has not been commercially negotiated yet. | Commercial discussions are still to take place. If the vendor knows that they have been selected, it may lead to higher prices and increase costs passed onto customers |
| OER- Operational Evolution Section 3.2.1.1, Pg.13, para 2 | Capex | ICT | Strategic Information | Disclose our internal manual workaround costs | Internal labour rates disclosed. | Commercial in confidence internal labour rates |
| OER-Operational Evolution Section 3.3, Pg.14, para 1 Section 3.3.1.1, Pg.14, para 2 | Capex | ICT | Strategic Information | Disclose product we want to implement | Commercial in confidence since proposed solution has not been commercially negotiated yet. | Commercial discussions are still to take place. If the vendor knows that they have been selected, it may lead to higher prices and increase |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|---------------------------------------|------------------------------|---|--|---|
| | | | | | | costs passed onto customers |
| OER- Operational Evolution Section 3.3.1.1, Pg.15, para 3 | Capex | ICT | Other | Identifies external party | Commercial in confidence reference. Permission hasn't been sought. | Identified external party and their benefits. |
| OER-Operational Evolution Section 3.3.1.2, Pg.15, bullet point 1 Section 3.3.2, Pg.16, para 2 | Capex | ICT | Strategic Information | Disclose product we want to implement | Commercial in confidence since proposed solution has not been commercially negotiated yet. | Commercial discussions are still to take place. If the vendor knows that they have been selected, it may lead to higher prices and increase costs passed onto customers |
| OER- Operational Evolution Section 5.1, Pg.19, Estimated Capex costs table | Capex | ICT | Market sensitive cost inputs | The estimated capital costs shows the breakdown into materials, labour and our network and corporate overhead rates | Commercially sensitive information on our internal rates | Discloses our internal overhead costs publicly. It is commercially sensitive |
| OER- Operational Evolution | Opex | ICT | Market sensitive cost inputs | Details Transgrid's opex that we are self funding | Commercial in confidence. Financial information on our internal | Commercial in confidence |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|---|--|--|
| Section 5.2, Pg.19, Estimated Opex Step Change table | | | | | funding for this initiative. | |
| OER- Operational Evolution Section 5.3, Pg.19, Benefits table | Capex | ICT | Market sensitive cost inputs | Details Transgrids internal labour rates and calculation methods for the benefits | Commercial in confidence. Financial information on our internal rates. | Commercial in confidence. Internal labour rate information cannot be disclosed. |
| OER- Operational Evolution Appendix, Pg.20,21 | Сарех | ICT | Information affecting the security of the network Strategic Information | Case study details our internal capability gaps, how we organise our staffing between contractors and permanent employees, identifies proposed software purchases | Commercial in confidence information and security concerns around identification of application components. | Commercial discussions are in progress. We will lose competitive advantage by disclosing proposed software purchases, how we allocate resources and security concerns around identification of certain platforms |
| OER- Cybersecurity Executive Summary, pg.2, Para 3, | Capex | Security | Information affecting the security of the network | The statement provides the current security maturity level of Transgrid. Details our cloud services model. | It details our security maturity level under the Australian Energy Sector Cyber Security Framework | We cannot disclose our security maturity level to the general public, only to the AESCSF. |



| Title, page and paragraph number (i.e. section and page number) points 3 and 4 | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|--|---|--|
| in para 8 OER- Cybersecurity Executive Summary, pg.2, Financial summary table | Capex | ICT/Security | Market sensitive cost inputs | Internal cost overhead information | Discloses our internal cost overheads | Information shows our internal cost overheads |
| OER-Cybersecurity Executive Summary, pg.3, Capital expenditure table breakdown, para 1 and IT Capex IFRS breakdown table | Capex | Security | Information affecting the security of the network Market sensitive cost inputs | Highlights our investment per year in relation to security spend and investment profile. | We will show the total spend but not the year by year breakdown to keep the security spend profile from public consumption. External parties may use this information to determine when to attempt to gain access to our network | Advised by security to keep the spend profile from public consumption in case it is used to time network intrusions. |
| OER- Cybersecurity Section 1, pg.4, para 4 | Capex | Security | Information affecting the security of the network | The statement provides the current security maturity level of Transgrid. | It can be worked out what our current cybersecurity maturity level is from this statement | It is not recommended to disclose our security maturity level to the general public, only to the AESCSF. |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|---|---|--|
| OER- Cybersecurity Section 1.2.2, pg. 5 & 6, Transgrid compliance timelines | Capex | Security | Information affecting the security of the network | Details the timelines when we will be compliant with the critical infrastructure bill | It sets out when we will be compliant with the critical infrastructure bill. | Security issue should it become public knowledge when we are going to be compliant with the critical infrastructure bill. |
| OER-Cybersecurity Section 1.3, pg. 6 - 8 Section 3.1.1, pg.10, para 2 all points, para 3, point 4, para 4 and appendix reference | Capex | Security | Information affecting the security of the network | Details our current capability gaps | We cannot publicly disclose our current capability gaps | Security issues with disclosing our security gaps |
| OER- Cybersecurity Section 2, pg.9, Related ICT programs table | Capex | Security | Information affecting the security of the network Market sensitive cost inputs | Describes our proposed solution in Operational Evolution OER | Commercial in confidence. The vendor hasn't been formally selected. Security issue identifying our cloud platforms. | Negotiations haven't taken place yet so it could impact our pricing with vendor if known. Security issue with identifying our cloud platforms. |
| OER- Cybersecurity | Capex | Security | Information affecting the | Breakdown will disclose our yearly security spend. References to | Publicly disclosing this will allow external parties to know our spend | We should not disclose a year by year breakdown in case external |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|---|---|--|
| Section 3.1.2, pg.10, Estimates table and para 2 & 3 | | | security of the network | external parties should be removed and detail of timing of security maturity level | profile year by year and the sentence also details our security maturity assessment | parties use that as a reference point to gain access to our network |
| OER- Cybersecurity Section 3.2, pg.12 | Capex | Security | Information affecting the security of the network | Details investigations into our security options | Disclosing security options investigated | Security issue when we disclose our options will reveal our current state |
| OER- Cybersecurity Section 5.1, pg.14, Estimated Capex costs table | Capex | Security | Market sensitive cost inputs | The estimated capital costs shows the breakdown into materials, labour and our network and corporate overhead rates | Commercially sensitive information on our internal rates | Discloses our internal overhead costs publicly. It is commercially sensitive |
| OER- Cybersecurity Section 6, pg.15-19 | Capex | Security | Information affecting the security of the network | Lists initiatives and also maps them to the relevant option as well as the AESCSF MIL-3 controls that will be affected by this initiative | Details all our security activities per initiative | Details all our security activities mapped to each security control. This cannot be disclosed publically in case they are targeted for attack. |
| OER- Cybersecurity | Capex | ICT Security | Information affecting the | Security controls descriptions | Details all the security control for each initiative | Details all our security activities mapped to each |



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|--|--|---------------------------------------|---|--|---|--|
| Section 7, pg.20-22 | | | security of the network | | | security control. This cannot be disclosed publically in case they are targeted for attack |
| OER- Customer Safety and Support Executive summary, pg 2, para 2 | Capex | ICT | Market Intelligence Strategic information | The example shows how our current internal systems interact | Disclosing our internal systems information will allow competitors access to sensitive information including security concerns around this disclosure | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |
| OER- Customer Safety and Support Executive summary, pg 2, para 3 | Capex | ICT | Information affecting the security of the network Strategic information | This example pertains to specific incidents that have occurred. | Security, safety and privacy issues around exposing this particular example | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment |
| OER- Customer Safety and Support Executive summary, pg 2, para 4 points 1 and 2 | Capex | ICT | Market Intelligence Strategic information | Identifies internal systems and proposed replacement solution | Market competitive advantage will be lost by naming proposed replacements. | Negotiations with preferred vendor may be impacted resulting in higher costs passed onto customers |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|---------------------------------------|--|--|--|--|
| OER- Customer Safety and Support Executive summary, pg 2, Table 1 | Capex | ICT | Market sensitive cost inputs | Details our internal corporate overhead costs | Commercially sensitive information detailing our internal overhead costs | Commercially sensitive financial information relating to our internal network and corporate overheads |
| OER- Customer Safety and Support Section 1.1, pg. 4, para 3 & 4 | Capex | ICT | Information affecting the security of the network Market intelligence | Details the system functions and internal process interactions of the current tools | Exposes internal processes that can be exploited | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 1.1, pg 4, Compliance bullet point | Capex | ICT | Information affecting the security of the network | Exposes security issue with concerns about meeting privacy regulation with the current tooling | Exposes security issue with concerns about privacy regulation. | Information should not be disclosed publicly. Internal compliance comment with a security implication |
| OER- Customer Safety and Support Section 1.1, pg4, Customer | Capex | ICT | Market intelligence | Remove references to appendix which is redacted for public view | Removed references to the appendix which contains detailed cases and internal examples | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |



| Title, page and paragraph number (i.e. section and page number) satisfaction | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|---|---|--|
| bullet point | | | | | | |
| OER-Customer Safety and Support Section 1.2.1, pg 5 Section 1.2.2.1, pg 5, para 1 Section 1.2.2.2, pg 5, para 1 & 2 Section 1.2.2.3, pg. 5, para 2 | Capex | ICT | Information affecting the security of the network | Naming of our current internal systems and the data that resides in them. References to redacted appendix removed | Internal systems can be targeted if known, especially since we disclose capability gaps in them as part of the submission. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 1.2.2.3, pg 5, para 1, bullet point 3 | Capex | ICT | Market intelligence | Exposes information in relation to complaints | Exposes information in relation to complaints | Deemed sensitive commercially. We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 1.2.3.1, pg 6 | Capex | ICT | Market intelligence | Exposes information in relation to current capability gaps within our systems and identifies examples | Exposes information in relation to current capability gaps within our systems and identifies examples. | We are not aware of any public benefit in publicly disclosing this information that |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|--|--|---|---|
| | | | | | References how we manage personal information. | could outweigh the detriment. |
| OER- Customer Safety and Support Section 1.2.3.2, pg 6 | Capex | ICT | Information affecting the security of the network Market intelligence | References how we store and process Personal Information and capability gaps | References how we store and process Personal Information and capability gaps and compliance | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 1.2.3.3, pg 6 | Capex | ICT | Information affecting the security of the network | References how we store and process Personal Information and capability gaps | Sensitive information around complaints and compliance. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 1.2.4 and 1.2.5.1, pg 6 | Capex | ICT | Information affecting the security of the network | Identifies our current systems | Identifies our current systems by name. Can be targeted by those outside the organisation. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support | Capex | ICT | Information affecting the security of the network | System limitations and comments around risks to compliance with the existing solution. | Actual examples of problems with the existing systems. | We are not aware of any public benefit in publicly disclosing this information that |



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|--|--|---------------------------------------|--|---|--|--|
| Section 1.4, pg 7, compliance and reliability bullet points | | | Market intelligence | | | could outweigh the detriment. |
| OER- Customer Safety and Support Section 3.1, pg 9, bullet point 2, 3, 5 | Capex | ICT | Information affecting the security of the network Market intelligence | Description around the type of Personally Identifiable Information collected in systems, identification of systems | Types of Personally Identifiable Information collected is listed as well as identification of our internal systems | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 3.1.2, pg 10, Risk Assessment Mitigation column for reputation and compliance | Capex | ICT | Information affecting the security of the network Market intelligence | Details how PI is captured today, issues with compliance | Details how PI is captured today, issues with compliance with this option | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 3.2, pg 10 & 11, para | Capex | ICT | Information affecting the security of the network Market sensitive cost inputs | Discloses our preferred solution and platform. Details Personal information process. | Negotiations have not occurred yet for selected option. Security issue with disclosing our cloud platform information. Issue with disclosing | Negotiations have not occurred yet for selected option. Security issue with disclosing our cloud platform information |



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|--|--|---------------------------------------|------------------------------|---|--|---|
| 1, bullet point 2, 3 & 5 | | | | | how Personal information is extracted. | |
| OER- Customer Safety and Support Section 3.2.1.1, pg 12, bullet points 1,2,3,4 | Capex | ICT | Market sensitive cost inputs | Discloses internal labour rates in calculations and examples | Discloses internal labour rates in calculations and examples | Discloses internal labour rates in calculations and examples. Commercially sensitive |
| OER-Customer Safety and Support Section 3.2.1.2, pg 12, bullet point 7 & 8 | Capex | ICT | Market intelligence | Refers to redacted appendix and details our current internal system | Refers to redacted appendix and details our current internal system | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support Section 3.2.2, pg.13, para 1 | Capex | ICT | Market intelligence | Details our capability against our competitors and industry peers | Details our capability against our competitors and industry peers | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER- Customer Safety and Support | Capex | ICT | Market Intelligence | Lists our internal tools | List our internal systems | We are not aware of any public benefit in publicly disclosing this information that |



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|--|--|---------------------------------------|------------------------------|---|--|--|
| Section 3.3, pg 13, bullet point 2 | | | | | | could outweigh the detriment. |
| OER- Customer Safety and Support Section 3.3.1.1, pg.14, bullet points 1, 2 | Capex | ICT | Market sensitive cost inputs | Discloses internal labour rates in calculations and examples | Discloses internal labour rates and costs in calculations and examples | Discloses internal labour rates in calculations and examples. Commercially sensitive |
| OER- Customer Safety and Support Section 4.2, pg 16, commercial evaluation table | Capex | ICT | Market sensitive cost inputs | Shows the amount of internally funded Opex step change | Shows the amount of internally funded Opex step change publicly | Shows the amount of internally funded Opex step change. Commercially sensitive and we are funding this ourselves |
| Section 5.1, pg 18, Estimated capital costs table | | | | | | |
| OER- Customer Safety and Support Section 5.2, pg 18, Estimated opex step change table | Opex | ICT | Market sensitive cost inputs | Shows the amount materials vs labour | Shows the amount of materials and labour breakdown | Shows the materials and labour breakdown Commercially sensitive and we are funding this ourselves |



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|--|--|---------------------------------------|--|--|--|--|
| OER- Customer Safety and Support Appendices A, C,D,E,F,G Pg.19, 21-25 | Capex | ICT | Market Intelligence | Details internal documentation, case studies, forecast methods, commercial in confidence materials, customer complain information, extracts from our systems | Details internal documentation, case studies, forecast methods, commercial in confidence materials, customer complain information, extracts from our systems | Internal process documents, examples from systems, commercial in confidence materials such as forecasting framework etc. |
| OER-Data and Decisioning Executive summary, pg.2, para.3, para 4 point 1. | Capex | ICT | Information affecting the security of the network Market intelligence | Identifies our legacy reporting platform and discloses our internal challenges to competitors. | Targeting of our legacy platform that needs to be replaced from a security perspective. It gives examples of information that may be used by competitors. | Security and commercially sensitive materials being disclosed. We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER-Data and Decisioning Executive summary, pg.2, Option table rationale for investment column | Capex | ICT | Information affecting the security of the network | Identifies our legacy reporting platform and tooling limitations to comply with regulatory bill | Identifies current limitations in tooling | Security concerns about disclosing this publicly. We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|---|---------------------------------------|--|--|--|---|
| OER-Data and Decisioning Executive summary, pg.3, Finance table Direct capital costs and network and corporate overhead columns | Capex | ICT | Market sensitive cost inputs | Discloses our internal network overhead | Commercial in confidence internal overhead figures | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER-Data and Decisioning Section 1.2.3, pg.4 & 5, para 1, 3 - 7 | Capex | ICT | Information affecting the security of the network | Details current capability gaps and vulnerabilities in the existing solution | Security issues in disclosing existing vulnerabilities | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER-Data and Decisioning Section 1.2.3, pg.5, footnote 2 | Capex | ICT | Market sensitive information | The footnote sets out internal rates calculation for the example in section 1.2.3. | Commercial in confidence internal overhead figures | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER-Data and Decisioning | Capex | ICT | Information affecting the | Details current capability gaps and vulnerabilities in the | Security issues in disclosing existing vulnerabilities, our | We are not aware of any public benefit in publicly |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|--|--|---------------------------------------|---|---|--|---|
| Section 3.1, pg.7, Para.1,2,4,5 | | | security of the network Market sensitive cost inputs | existing solution. Identifies our legacy systems and platform and our proposed future platform | existing systems and our future systems where we have not yet negotiated contracts. | disclosing this information that could outweigh the detriment. By disclosing, we may be commercially worse off identifying our future state and preferred vendors. |
| OER-Data and Decisioning Section 3.3, pg.10, Table Options considered but not progressed | Capex | ICT | Information affecting the security of the network Market sensitive cost inputs | Details current capability gaps and vulnerabilities in the existing solution. Identifies our legacy systems and platform and our proposed future platform | Security issues in disclosing existing vulnerabilities, our existing systems and current workarounds in place. Details our current overheads supporting these systems. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. These options were not progressed nor costed so there is no public benefit in their disclosure. |
| OER-Data and Decisioning Section 4.1, pg.11, Commercial evaluation table Opex column | Capex | ICT | Market sensitive cost inputs | Details our internal opex funding. | This is the amount that we are funding ourselves outside of the regulatory request. Commercial in confidence. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. This funding is self- |



| Title, page and paragraph number (i.e. section and page number) | Description of the confidential information | Topic of the confidential information | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Why the identified detriment is not outweighed by the public benefit |
|---|--|---------------------------------------|------------------------------|---|--|---|
| | | | | | | funded by Transgrid. |
| OER-Data and Decisioning Section 5.1.1, pg.12, Estimated capital costs table | Capex | ICT | Market sensitive cost inputs | Details our internal overhead costs and breakdowns. | This is the amount covers our internal overheads. Commercial in confidence. The full requested amounts are still publicly available. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. |
| OER-Data and Decisioning Section 5.1.2, pg.12, Estimated opex step change table | Capex | ICT | Market sensitive cost inputs | Details our internal opex funding. | This is the amount that we are funding ourselves outside of the regulatory request. Commercial in confidence. | We are not aware of any public benefit in publicly disclosing this information that could outweigh the detriment. This funding is self-funded by Transgrid. |



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 |
|---|--|--|-------------------------------------|--|---|
| Transgrid 2023-28 Revenue Proposal (including Cover Letter, Overview, Compliance Checklists, Confidentiality Claim) | 6 | 365 | 371 | 2% | 98% |
| Reset Regulatory Information Notice | 8 | 212 | 220 | 4% | 96% |
| Revenue Proposal Models | 14 | 104 | 118 | 12% | 88% |
| Revenue Proposal Attachments | 87 | 990 | 1077 | 8% | 92% |
| Revenue Proposal Supporting Documents – Asset Management Strategies | 0 | 1073 | 1073 | 0% | 100% |
| Revenue Proposal Supporting Documents – Business cases | 136 | 2668 | 2804 | 5% | 95% |
| Total | 251 | 5412 | 5663 | 4% | 96% |