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UE Confidential Information Templates

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United Energy Confidentiality Template

Note: If a piece of information is identified as commercially sensitive there are steps that can be taken to provide this information in certain circumstances. In addition to completing the confidentiality template a confidential (version which highlights in yellow the confidential information) and public version (the confidential information is redacted i.e. removed or blacked out rather than highlighted).

AER categories of confidential information

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

1. Information Technology

1.1. Confidential IT documents

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 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).
IT18 – IT Cost Model (for Capital Plan)						
UE IT Capital Plan 2016 - 2020 Cost Model FINAL 02042015 CONFIDENTIAL The following Worksheets are Confidential all Tabs and fields are highlighted in Yellow: - UnitC_A - LbrCapex_A - LbrCapex_C - CapexFTE_C	Confidential information is Contracted Labour rates (Commercial in confidence) and permanent staff labour Rates along with all formulae and fields that would allow these rates to be determined.	Capex	<i>Market sensitive cost inputs</i>	Information includes internal labour rates and contracted labour rates. These rates are market sensitive and in the case of the contracted labour rates are Commercially confidential	Contracted rates are commercially sensitive and impact on our providers' competitive market. Internal Labour rates are similarly market sensitive	

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IT82 - IT Security Program						
PJ23 - Security Program, Page 5, Paragraph 5 onwards	List of Security elements that are the subject of the Program	Security	<i>Information affecting the security of the network</i>	If any element in this list fails then UE's Network security would be at Risk.	Exposing this list potentially indicates UE's security weaknesses to potential attack	Any attack that successfully breaches UE's security will potentially cause outages, increase safety risks and have a significant adverse impact on consumers. There is no significant benefit to consumers in identifying areas of security that require attention
PJ23 - Security Program, Page 7 paragraph 3 and Economic Evaluation table	High level view of the costs and benefits associated with the Program	Security	<i>Information affecting the security of the network</i>	The current risk and proposed spend on the program relate to security.	The cost and economic evaluation of the security program could be interpreted as an indicator of UE's current vulnerability and encourage attack.	
PJ23 - Security Program, Tables in pages 8-14 inclusive and subsequent lists of key technology on pages 14 and 15	Description of the Security projects and activities that make-up the Security Program	Security	<i>Information affecting the security of the network</i>	The confidential information describes the security activities that UE needs to undertake.	To a potential attacker(s), the detail contained in these tables could be interpreted to determine indicates UE's security vulnerability and allow the attacker to target his attack.	

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PJ23 - Security Program, Page 16 Project Capital Costs Page 17 Operating Cost impacts and Timeframes on pages 17 and 18	A breakdown of the Capital and Opex costs for each Security initiative and the timing of those costs	Security	<i>Information affecting the security of the network</i>	The confidential information describes the level and nature and timing of the expenditure on security initiatives.	The breakdown of costs for each security initiative and timing could be interpreted as an indicator of UE's current vulnerability and encourage attack.	
PJ23 - Security Program, Page 18, Risks and Opportunities second bullet Project Capital Costs	A statement of the risk and implication of the priorities for UE for addressing security risks	Security	<i>Information affecting the security of the network</i>	The confidential information indicates that the timeframes implementing the security initiatives are based on the risk of security incidents	This information could be interpreted to identify UE's greatest security weaknesses.	

1.1. Proportion of confidential material - IT documents

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
UE IT EDPR Submission consisting of ~50 documents	18 pages	503	521	3.5%	96.5%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in United Energy 2016-2020 Regulatory Proposal that is subject to a claim of confidentiality compared to that which is not.

2. Alternative Control Services (ACS)

2.1. Confidential ACS documents

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 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).
REG1 – ACS – Fee Based and Quoted ACS Cost Analysis AND ACS Fee Based and Quoted Services Overview Paper						
Entire Excel Spreadsheet: "Fee-based and Quoted ACS Analysis – Confidential"	Information pertaining to third party Service Providers contracted costs and unit costs.	Opex, Capex, unit cost rates relating to third party contracts.	Market sensitive cost inputs	The "Fee-based and Quoted ACS Analysis – Confidential" spreadsheet contains confidential supplier pricing; and for certain ACS, anticipated supplier pricing factored into the cost build-up for the forthcoming regulatory period.	Supplier prices are commercial-in-confidence. Disclosure of external Service Provider unit cost information would have the potential to adversely affect future tender processes.	There would be a net public detriment if this information were disclosed. Possible impacts include the distortion of competition among suppliers, leading to tender prices being higher than may otherwise be the case. Such outcomes would be to the detriment of the long term interests of consumers
Document: Fee-based and Quoted Alternative Control Services 2016 – 2020 – Overview Paper	Information pertaining to anticipated increase in external Service Provider field-officer unit costs – Page 15, first bullet point. Page 19, Step 2: 2 nd paragraph	Unit cost rates relating to third party contract.	Market sensitive cost inputs	There is a reference to anticipated supplier pricing factored into the cost build-up for the forthcoming regulatory period.	Disclosure of this information has the potential to adversely affect future tender processes.	There would be a net public detriment if this information were disclosed. Possible impacts include the distortion of competition among suppliers, leading to tender prices being higher than would otherwise be the case. Such outcomes would be to the detriment of the long term interests of consumers

2.2. Proportion of confidential material - ACS documents

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
Entire Excel spreadsheet: "Fee-based and Quoted ACS Analysis – Confidential"	100% of the spreadsheet – 9 worksheets	n/a	100% of the spreadsheet – 9 worksheets	100%	n/a
Document: Fee-based and Quoted Alternative Control Services 2016 – 2020 – Overview Paper	2	37	39 (excluding front cover)	5%	95%

3. Networks - Plans, Policies and Procedures

3.1. Confidential Network documents

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 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).
NET 153 - Remote Terminal Units Lifecycle Strategy and Plan						
UE PL 2035 Throughout the document	All references to vendors such as Logica, Schneider, GE, Telegyr, Foxboro, and SEL.	Vendor identity.	Information affecting the security of the network.	If there are known vulnerabilities with any vendor product portfolio, UE's distribution network could be a potential target for malicious attacks.	People with malicious intents could use the information to target UE's electricity distribution network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Automation technologies are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific vendors delivers no benefit or disadvantage to the public.
UE PL 2035 Throughout the document	All references to specific products such as MD1000 RTUs, MD3311 RTUs, SCD5200 RTUs, C50 RTUs, D20 RTUs, SEL2032 RTUs, Schneider PLC, P2E processor, and Big Brother network monitoring application.	Product identity.	Information affecting the security of the network.	If there are known vulnerabilities with specific products then UE's distribution network could be a potential target for malicious attacks.	People with malicious intents could use the information to target UE's electricity distribution network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Automation technologies are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific products delivers no benefit or disadvantage to the public.

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 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).
NET190 - Secure Centralised Device Management System (SCDMS)						
UE PL 2402 Throughout the document	All references to vendor product types used (or being evaluated) to operate and control the United Energy electrical distribution network such as IED Management software have been removed.	Product identity	Information affecting the security of the network.	Knowledge of specific vendor equipment used for the operation and control of the electrical distribution network creates potential security risks (e.g. known vulnerabilities) to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via cyber attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of specific vendor equipment types used within the electrical distribution network and the detriment of disclosure is greater than any public benefit
UE PL 2402 Throughout the document	All references to sensitive infrastructure locations used to operate and control the United Energy electrical distribution network such as zone substations.	Infrastructure locations	Information affecting the security of the network.	Knowledge of specific infrastructure locations creates potential security risks to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via physical attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of the locations of sensitive infrastructure used by the electrical distribution network and the detriment of disclosure is greater than any public benefit.

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UE PL 2402 Throughout the document	All references to current security vulnerabilities within equipment and systems used to operate and control the United Energy electrical distribution network such as IEDs have been removed.	Security Vulnerabilities	Information affecting the security of the network.	Knowledge of security vulnerabilities of equipment and systems used for the operation and control of the electrical distribution network creates potential security risks to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via cyber attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of vulnerabilities of specific equipment and system used within the electrical distribution network and the detriment of disclosure is greater than any public benefit.
UE PL 2402 Table 17 - Page 39	All references to sensitive pricing information	Sensitive price information	Other	Knowledge of sensitive price information could be used as a competitive advantage by suppliers.	Pricing has been provided to United Energy in confidence from suppliers with the understanding that this is to remain confidential	United Energy believes there is limited public benefit in the disclosure of sensitive pricing information of equipment used (or to be used) on the electrical distribution network and the detriment of disclosure is greater than any public benefit.
UE PL 2402 Page 41	All references to confidential / internal or external documents	Confidential / internal documentation	Other	References to numerous documents (some internal and / or confidential) used to develop this document are not relevant to the general public.	Numerous referenced documents are internal confidential documents not for external distribution.	United Energy believes there is limited public benefit in the disclosure of referenced documents (some of which are confidential internal documents) used to develop this strategy.

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 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).
NET229 - Communications Networks Lifecycle Strategy and Plan						
UE PL 2003 Throughout the document	All references to vendors such as Telstra, 37South, Juniper, Cisco, Hirschmann, Ruggedcomm, Nokia, Avara, Trio, Schneider, Tekron, NEC, Cybertec, Netcomm, and Wavecom.	Vendor identity.	Information affecting the security of the network.	If there are known vulnerabilities with any particular vendor services, products range, and IT systems then UE's distribution network could be a potential target for malicious attacks.	People with malicious intents could use the information to target UE's electricity distribution network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Communications infrastructures are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific vendors delivers no benefit or disadvantage to the public.

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UE PL 2003 Throughout the document	All references to specific products such as Junos space, Hi Vision, Big Brother, ION Enterprise, MD3311 RTU, DRMCC, Clear SCADA, Trio 900 MHz series radios, Trio D-series radios, Trio E-series radios, MS2108-2 Ethernet switch, MS3124-4 Ethernet Switch, MS20Ethernet switch, MS30 Ethernet switch,	Product identity.	Information affecting the security of the network.	If there are known vulnerabilities with specific products then UE's distribution network could be a potential target for malicious attacks.	People with malicious intents could use the information to target UE's electricity distribution network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Communications infrastructures are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific vendors delivers no benefit or disadvantage to the public.
UE PL 2003 Throughout the document	All references UE's digital radio network technologies: Trio 900 MHz series radios, Trio D-series radios and Trio E-	Private point to multipoint digital radio communications network (hardware and operational	Information affecting the security of the network.	Any reference to specific technologies as well as any known vulnerabilities could make UE's distribution network a potential target for malicious attacks.	People with malicious intents could use this information to interfere with UE's radio communications network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Communications infrastructures are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific technologies/platforms/products delivers no benefit or disadvantage to the public.

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UE PL 2003 Throughout the document	All references UE's digital radio network technologies: Trio 900 MHz series radios, Trio D-series radios and Trio E-series radios.	Private point to multipoint digital radio communications network (hardware and operational frequencies).	Information affecting the security of the network.	Any reference to specific technologies as well as any known vulnerabilities could make UE's distribution network a potential target for malicious attacks.	People with malicious intents could use this information to interfere with UE's radio communications network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Communications infrastructures are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific technologies/platforms/products delivers no benefit or disadvantage to the public.
UE PL 2003 Throughout the document	All reference to radio repeater sites including Ferney Creek, Olinda, Arthur Seat, Lower Plenty, Collins St, and Eureka.	Private point to multipoint digital radio communications network (hardware and operational frequencies).	Information affecting the security of the network.	Any reference to key communications network asset locations could make UE's distribution network a potential target for malicious attacks.	People with malicious intents could use this information to interfere with UE's radio communications network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Communications infrastructures are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific key communications network locations delivers no benefit or disadvantage to the public.
UE PL 2003 Throughout the document	All reference to RBD and STO.	Private point to point (between RBD and STO zone substations) digital radio communications network.	Information affecting the security of the network.	Any reference to key communications network asset locations could make UE's distribution network a potential target for malicious attacks.	People with malicious intents could use this information to interfere with UE's radio communications network succeeding in disrupting supply or adversely impacting the safe operations of the network.	Communications infrastructures are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific key communications network locations delivers no benefit or disadvantage to the public.
UE PL 2003 Throughout the document	All reference to SVTS.	SP AusNet's Public Switched Telephone Network.	Information affecting the security of the network.	SVTS is mentioned in this document in relation to the SP AusNet's Private Telephone Network (PTN) which is also known as Emergency Telephone Network (ETN). ETN is a key voice communications system extensively used by AusNet Services.	UE has not obtained SP AusNet's permission to publish this information (SVTS is a key node for ETN).	N/A

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UE PL 2003 Table 6 on page 38	Commercially sensitive Telco services costs.	Historical Telco services costs (inclusive of ADSL, PSTN, 3G and GSM fees), original radio network operations costs, updated radio maintenance costs,	Market sensitive cost inputs	Third party services costs are potentially commercially sensitive.	If other Telco service providers become aware of UE's historical costs for specific service categories then this may impact any future competitive tendering processes.	Third party communications services are an integral part of the modern/smart electricity distribution networks, however the knowledge of specific costs categories delivers no benefit or disadvantage to the public.
NET327 - Pole Top Field Communications						
UE PL 2400 Throughout the document	All references to sensitive infrastructure locations used to operate and control the United Energy electrical distribution network such as data centres, radio repeater sites have been removed.	Communications Infrastructure locations	Information affecting the security of the network.	Knowledge of specific infrastructure locations creates potential security risks to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via physical attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of the locations of sensitive communications assets used by the electrical distribution network and the detriment of disclosure is greater than any public benefit.

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UE PL 2400 Throughout the document	All references to vendor product types used to operate and control the United Energy electrical distribution network such as radios and monitoring and control equipment have been removed.	Product identity	Information affecting the security of the network.	Knowledge of specific vendor equipment used for the operation and control of the electrical distribution network creates potential security risks (e.g. known vulnerabilities) to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via physical or cyber attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of specific vendor equipment types used within the electrical distribution network and the detriment of disclosure is greater than any public benefit.
UE PL 2400 Throughout the document	All references to United Energy's digital radio network technologies	Private point to multipoint digital radio communications network (hardware and operational frequencies).	Information affecting the security of the network.	Knowledge of specific communications technologies used for the operation and control of the electrical distribution network creates potential security risks (e.g. interference) to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via physical or cyber attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of digital communications technologies used within the electrical distribution network and the detriment of disclosure is greater than any public benefit.
UE PL 2400 Throughout the document	All references to deficiencies with United Energy's current RCGS field device.	Product deficiencies	Other	Knowledge of product deficiencies could potentially impact current commercial negotiations.	The information disclosed could be used to the advantage of other parties currently in commercial negotiations with United Energy.	United Energy believes there is limited public benefit in the disclosure of specific product deficiencies and the detriment of disclosure is greater than any public benefit.

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UE PL 2400 Throughout the document	All references to confidential / internal or external documents	Confidential / internal documentation Other	Other	References to numerous documents (some internal and / or confidential) used to develop this document are not relevant to the general public.	Numerous referenced documents are internal confidential documents not for external distribution.	United Energy believes there is limited public benefit in the disclosure of referenced documents (some of which are confidential internal documents) used to develop this strategy.
UE PL 2400 Throughout the document	All references to personal information	Personal information	Personal Information	Personal details of specific staff and contractors should remain confidential.	Names of individuals whose identity can reasonably be ascertained from the information raises privacy considerations.	United Energy believes there is limited public benefit in the disclosure of personal information and the potential detriment of disclosure (e.g. privacy considerations) is greater than any public benefit.
NET458 - Storage Business Case						
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 7 (ENTIRE PAGE)	Viable site identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.

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EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 8 (ENTIRE PAGE)	Viable site identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 9 (ENTIRE PAGE)	Viable site identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 10 (ENTIRE PAGE)	Viable site identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 11 (ENTIRE PAGE EXCEPT CONCLUSION)	Viable sites identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.

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EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 13 (TABLE 8)	Pricing information for deployment of storage	Competitive storage deployment	Market sensitive cost inputs	Confidential pricing estimates	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 13 (FIGURE 9)	Pricing information for deployment of storage	Competitive storage deployment	Market sensitive cost inputs	Confidential pricing estimates	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 14 (TABLE 9 ROW 2)	Pricing information for deployment of storage	Competitive storage deployment	Market sensitive cost inputs	Confidential pricing estimates	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 15 (ENTIRE PAGE)	Viable sites identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.

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 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).
EDPR 2016-2020 Storage - Project № UE-DSS-N-17-999 PAGE 16 (ENTIRE PAGE)	Viable site identified for the competitive deployment of storage	Competitive storage deployment	Market intelligence	Confidential economic viability analysis	Potential competitors not required to disclose this information until time of competitive bid. Early disclosure of this information would lead to unfair advantage for potential competitors	Alternative solutions for augmentation sourced through the Distribution Planning & Expansions Framework established in the NER. Opportunity for competing bids to address network capacity constraints provided by this framework.
NET460 - Intelligent Secure Substation Asset Management (ISSAM)						
UE PL 2401 Throughout the document	All references to sensitive infrastructure locations used to operate and control the United Energy electrical distribution network such as zone substation sites has been removed.	Infrastructure locations	Information affecting the security of the network.	Knowledge of specific infrastructure locations creates potential security risks to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via physical attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of the locations of sensitive infrastructure used by the electrical distribution network and the detriment of disclosure is greater than any public benefit.

CONFIDENTIAL INFORMATION TEMPLATES

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 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).
UE PL 2401 Table 3 - Pages 38 - 39	All references to sensitive risk rating information on infrastructure used to operate and control the United Energy electrical distribution network has been removed.	Infrastructure security risk ratings	Information affecting the security of the network.	Knowledge of specific infrastructure security risk ratings creates potential security risks to the electrical distribution network whereby they could become targets for malicious attacks.	The information if disclosed could be used by people with malicious intent to target United Energy's electricity distribution network via physical attacks potentially succeeding in disrupting supply or adversely impacting the safe operation of the network.	United Energy believes there is limited public benefit in the disclosure of security risk information of infrastructure used by the electrical distribution network and the detriment of disclosure is greater than any public benefit.
UE PL 2401 Paragraph 2, Page 41	Reference to the number of safety incidents within United Energy zone substations	Network Safety Incidents	Other	The number of Safety incidents within zone substations on the network without any context is not relevant to the general public.	Without context and detail behind this information this could be taken out of context to the detriment of United Energy and its service providers.	United Energy believes there is limited public benefit in the disclosure of the number of safety incidents within Zone substations on the electrical distribution network and the detriment of disclosure is greater than any public benefit.

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 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).
UE PL 2401 Table 17 - Page 57	All references to sensitive pricing information	Sensitive price information	Other	Knowledge of sensitive price information could be used as a competitive advantage by suppliers.	Pricing has been provided to United Energy in confidence from suppliers with the understanding that this is to remain confidential.	United Energy believes there is limited public benefit in the disclosure of sensitive pricing information of equipment used (or to be used) on the electrical distribution network and the detriment of disclosure is greater than any public benefit.
UE PL 2401 Page 60	All references to confidential / internal or external documents	Confidential / internal documentation	Other	References to numerous documents (some internal and / or confidential) used to develop this document are not relevant to the general public.	Numerous referenced documents are internal confidential documents not for external distribution.	United Energy believes there is limited public benefit in the disclosure of referenced documents (some of which are confidential internal documents) used to develop this strategy.

3.2. Proportion of confidential material - Network documents

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
NET 153 - Remote Terminal Units Lifecycle Strategy and Plan	12	24	36	33.3%	66.7%

CONFIDENTIAL INFORMATION TEMPLATES

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
NET190 - Secure Centralised Device Management System (SCDMS)	10	30	40	25.0%	75.0%
NET229 - Communications Networks Lifecycle Strategy and Plan	18	29	47	38.3%	61.7%
NET327 - Pole Top Field Communications	51	38	89	57.3%	42.7%
NET458 - Storage Business Case	9	7	16	56.3%	43.8%
NET460 - Intelligent Secure Substation Asset Management (ISSAM)	12	47	59	20.3%	79.7%

4. Insurance Premiums

4.1. Confidential Insurance documents

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 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).
C&L653 - Estimation of Insurance Premiums AND Spreadsheet						
Estimation of Insurance Premiums 2016-2020, page 2, page 9 & pages 11 – 20 AND Spreadsheet	Details on insurance policies including policy limits, deductibles and insured values; details on insurance premium forecasts; details on claims history	Opex	Market sensitive cost inputs	<p>This information will prejudice United Energy's ability to obtain competitive pricing when negotiating insurance renewals.</p> <p>This information is sensitive in respect of United Energy's management of third party claims.</p> <p>For certain insurance policies, United Energy is required to use all reasonable efforts not to disclose the existence of those policies to the third parties.</p>	<p>Disclosing premium forecasts would negatively impact United Energy's ability to negotiate competitive insurance premiums as insurers may place a floor on its offered pricing based on forecast premiums rather than offer pricing based on market conditions.</p> <p>Releasing details on policy limits and deductibles may encourage additional third party claims against United Energy, which has the potential to increase premium costs.</p> <p>Insurers may deny cover in the event of a claim if United Energy is found to have breached its confidentiality obligations under its insurance policies.</p>	Disclosure is likely to lead to higher insurance premiums without any public benefits.

4.2. Proportion of confidential material - Insurance documents

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
Estimation of Insurance Premiums 2016-2020 (including Spreadsheet)	15 pages	10 pages	25 pages	60%	40%

5. Cost of Capital

5.1. Confidential Cost of Capital documents

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 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).
REG649 – Letter – Nom Avg periods – Confidential						
<p>Letter to Australian Energy Regulator from Jeremy Rothfield, Network Regulation and Compliance Manager, dated 30th April 2015.</p> <p>Material over which confidentiality is claimed - From half way through the sixth paragraph on page 1 until the penultimate paragraph, (inclusive) on page 2 of the letter, and the entirety of the annexure.</p>	<p>The information identifies the debt data averaging periods for 2016 and also for 2017, for use in determining the rate of return.</p>	<p>The rate of return.</p>	<p>Information affecting the security of the network and market sensitive cost inputs</p>	<p>The information identifies the averaging periods for United Energy that are used for the assessment of the rate of return on debt. The periods are in 2016 and 2017.</p>	<p>If the periods were publicly revealed, then the disclosure would be likely to compromise the ability of the business to either raise debt or to efficiently hedge the base rate during the averaging period. Other financial market participants would become aware that United Energy was either planning on borrowing, or else needed to hedge the base rate.</p>	<p>The likely outcome of the information being made public is that the costs for the business would increase, an outcome which would not be in the long term interests of consumers. There would be no detriment to stakeholders resulting from the non-publication of the averaging period information. The ability of stakeholders to assess and understand the substance of other issues in the regulatory proposal would not be hindered. Furthermore, there is no public benefit to be gained from the disclosure of the information.</p>

5.2. Proportion of confidential material - Cost of Capital documents

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
Letter to Australian Energy Regulator from Jeremy Rothfield, Network Regulation and Compliance Manager, dated 30th April 2015: Nomination of averaging periods in relation to United Energy Distribution Pty Limited's regulatory proposal for 2016-2020.	2	2	4	50 per cent	50 per cent

ATTACHMENT A – PROPORTION OF CONFIDENTIAL MATERIAL IN TOTAL SUBMISSION

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
United Energy 2016 to 2020 Regulatory Proposal, 30 April 2015	158	31,955	32,113	0.5%	95.5%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in United Energy 2016-2020 Regulatory Proposal that is subject to a claim of confidentiality compared to that which is not.