

Appendix P: Confidentiality claim

Regulatory proposal for the ACT electricity
distribution network 2024–29

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Table 1 Confidentiality claim

Title, page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category.	How and why disclosure of the confidential information would cause detriment	Why the identified detriment is not outweighed by the public benefit
Regulatory proposal Appendix B Director certification of key assumptions Page 1	Staff name and signature	Director certification letter	Personal information	This contains the names and signature of personnel.	This would raise privacy considerations for personnel therefore redacted as required by the AER.	AER requested confidentiality.
Appendix K Communication Link-ACTCOSS Evoenergy workshop listening report Pages 5, 6 and 13	Personal information	Workshop attendees' details	Personal information	Personal information	This would raise privacy considerations for personnel therefore redacted as required by the AER.	There is no public benefit in disclosing private employee information.

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<p>Appendix 1.9</p> <p>Cutler Merz-Repex Model Results – Fully confidential</p>	<p>Details on unit rates</p>	<p>Unit rate information</p>	<p>Market sensitive inputs</p>	<p>Contains market sensitive cost inputs, which affects Evoenergy’s ability to obtain competitive prices in future transactions, including tender processes.</p>	<p>May lead to anti-competitive tender processes.</p> <p>Identification of unit costs could reveal the thresholds that vendors could price in for assets.</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information.</p>
<p>Appendix 1.13</p> <p>Asset Portfolio Strategy: Secondary Systems Assets</p> <p>Pages 20 and 21, Section 3.3 and Figure 8</p>	<p>Secondary Systems Cyber Security Strategy</p>	<p>Cyber Security</p>	<p>Information affecting the security of the network</p>	<p>Describes sensitive information on the technologies architecture and vulnerabilities of Evoenergy SCADA, protection, and communications systems; the cyber security posture and proposed mitigations.</p>	<p>Would provide an adversary with sensitive information that could result in a successful cyber-attack to Evoenergy critical infrastructure.</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information.</p>
<p>Appendix 1.17</p> <p>Augmentation to Achieve Net Zero</p>	<p>Details on unit rates</p>	<p>Unit rate information</p>	<p>Market sensitive inputs</p>	<p>Contains market sensitive cost inputs, which affects Evoenergy’s ability to obtain competitive prices in future transactions,</p>	<p>May lead to anti-competitive tender processes.</p> <p>Identification of unit costs could reveal the thresholds that</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information.</p>

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Table 12, pp 32/33.				including tender processes.	vendors could price in for assets.	
Appendix 1.18 Molonglo Zone Substation Project Justification Report Pages 13 – 19, Appendix A.1	Project Cost Estimate	Internal labour costs Estimates for work subject to tender processes	Market sensitive cost inputs	Information includes internal labour costs and information which may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes.	May lead to anti-competitive tender processes.	Overall costing of project and options analysis is detailed. Project will also go through publicly available RIT-D.
Appendix 1.19 Strathnairn Zone Substation Project Justification Report Pages 14 – 20, Appendix A.1	Project Cost Estimate	Internal labour costs Estimates for work subject to tender processes	Market sensitive cost inputs	Information includes internal labour costs and information which may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes.	May lead to anti-competitive tender processes	Overall costing of project and options analysis is detailed. Project will also go through publicly available RIT-D.

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<p>Appendix 1.22</p> <p>Information Communication Technology Plan</p> <p>Page 12, Paragraph 2; (1)</p> <p>Page 25, Paragraph 3; (2)</p> <p>Page 27, Figure 8; (3)</p> <p>Diagram on Page 49 (4)</p>	<p>Forecast investment within finance system (1)</p> <p>Removal of functionality from existing solution (2)</p> <p>Labour rates for contracted resources (3)</p> <p>Current state system architecture (4)</p>	<p>Non network ICT capex (all)</p>	<p>Market sensitive cost inputs (1)</p> <p>Market sensitive cost inputs (2)</p> <p>Market sensitive cost inputs (3)</p> <p>Information affecting the security of the network (4)</p>	<p>Negotiations relating to the implementation of the system are ongoing. (1)/(2)</p> <p>The information has the potential to negatively impact on Evoenergy's negotiation for ICT resources. (2)/(3)</p> <p>This information provides potential cyber security actors with critical information relating to the systems and associated (4) integrations across the network.</p>	<p>May lead to sub-optimal pricing outcome through negotiations (1)</p> <p>May lead to sub-optimal rate negotiations in the future. (2)/(3)</p> <p>Increased risk of vulnerability in critical ICT systems being exploited through cyber event. (4)</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information. (all)</p>
<p>Appendix 1.23</p> <p>ICT capex investment briefs</p> <p>Page 15, Paragraphs 3 and</p>	<p>Version information for ICT systems</p>	<p>Non network ICT capex</p>	<p>Information affecting the security of the network</p>	<p>This information provides potential cyber security actors with critical information relating to the systems</p>	<p>Increased risk of vulnerability in critical ICT systems being exploited through cyber event.</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information.</p>

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4; Page 16 Paragraph 4; Page 20, Paragraphs 2 and 3; Page 21 Paragraphs 1 and 4; Page 21, Table 11; Page 22 Paragraphs 3 and 4; Page 23, Paragraphs 1, 3 and 6; Page 28, Paragraph 4; Page 38, Paragraph 5; Page 61, Paragraph 1				utilised by Evoenergy.		
Appendix 1.24 ADMS Enhancements Business Case Page 5, Option 2; Pages 6 – 7, Option 2 (detail)	Overview of Options Option 2 – Enhanced ADMS Tools	ADMS	Other	Contains sensitive information about the ADMS vendor’s software functionality.	Would provide sensitive information to the ADMS vendor’s competitors that could result in an unfair advantage to them.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.

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Appendix 1.24 ADMS Enhancements Business Case Pages 10 – 11, FTE salaries	FTE salaries	Internal labour costs	Market sensitive cost inputs	Contains market sensitive cost inputs related to workers' compensation rates, which may impact Evoenergy's ability to obtain competitive rates in future tender processes.	May lead to anti-competitive competitive tender processes.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.
Appendix 1.25 ADMS Upgrades Business Case Pages 5 - 6, Section 2 ADMS Support Policy and Table 2	ADMS Support Policy	ADMS	Other	Contains sensitive information about the ADMS vendor's support policy.	Would provide sensitive information to the ADMS vendor's competitors that could result in an unfair advantage to them.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.
Appendix 1.26 Accounting for capital expenditure procedure – Fully confidential	Capitalisation of costs	Financial statements	Other	Contains specific details on how Evoenergy capitalises costs internally, relevant useful lives of assets and the impairment testing	Information is contained in Evoenergy's financial statements which are not made publicly available.	There is no public benefit in disclosing this information as Evoenergy is not required to publicly disclose it.

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				performed over assets.		
Appendix 2.2 Marsh-ACT Workers' Compensation Page 10 (all except Paragraph 1); Page 11; Page 12; Page 13, last sentence in Paragraph 2	Workers' compensation rates and remuneration information	Opex workers' compensation information and rates Internal labour costs	Market sensitive cost inputs	Contains market sensitive cost inputs related to workers' compensation rates, which may impact Evoenergy's ability to obtain competitive rates in future tender processes.	May lead to anti-competitive tender processes.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.
Appendix 2.3 Insurance premium step change business case Page 6, Paragraphs 5 and 10; Page 7, Table 1; Page 11, Paragraphs 3 - 4; Page 12, Table 3;	Total insurance costs and strategies to procure competitive premium rates	Opex insurance premiums	Market sensitive inputs and strategic information	Contains market sensitive cost inputs, which affects Evoenergy's ability to obtain competitive prices in future transactions, including tender processes. Also contains strategic information related to procuring a competitive market	May lead to anti-competitive tender processes. Identification of strategy may undermine Evoenergy's ability to procure at the best rate.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.

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Page 13, last sentence in the first dot point and Figure 1; Page 15, Paragraph 1 (including footnote)				price, and the release of this information will adversely impact Evoenergy's ability to negotiate a fair market price.		
Appendix 2.4 Marsh-Premium projections and insurance market update Page 4, Paragraph 1, Table 1; Page 9, Paragraph 3; Page 10, Paragraph 1; Page 11, Paragraphs 2, 4, Tables 1, 2; Page 12, Table 3; Page 13, Paragraphs 1-2, 4; Page 14, Tables 4, 5; Page 15, Paragraph 1, Tables 6-7; Page 16, Paragraph 1,	Total insurance costs and strategies to procure competitive premium rates	Operating expenditure insurance premiums	Market sensitive inputs and strategic information	Contains market sensitive cost inputs, which affects Evoenergy's ability to obtain competitive prices in future transactions, including tender processes.	May lead to anti-competitive tender processes, and impact Evoenergy's ability to obtain a competitive price.	Evoenergy is not aware of any material public benefit in publicly disclosing this information.

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Tables 8-9; Page 17, Tables 10-11; Page 18, Tables 12-13; Page 30, Paragraph 7						
<p>Appendix 2.5</p> <p>Distributed energy resources step change business case</p> <p>Page 21, Table 9; Page 22, Table 10; Page 26, Table 12; Page 27, Table 13; Page 31, Table 15; Page 32, Table 16; Page 35, Table 18; Page 36, Table 19; Page 37, Table 20; Page 49, Table 23</p>	<p>Individual investment cost and benefit estimates</p> <p>Per unit rate for network upgrade</p>	<p>Estimates for work subject to tender processes</p>	<p>Market intelligence</p> <p>Market sensitive cost inputs</p>	<p>Information includes internal labour costs and information which may affect our ability to obtain competitive prices in future infrastructure transactions, such as tender processes. Evoenergy will be required to go to market for procurement of assets, data, and software services, for which the pricing can be back-calculated from the individual investment and benefits numbers</p>	<p>May lead to anti-competitive tender processes.</p> <p>Identification of unit costs could reveal the thresholds that vendors could price in for assets.</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information.</p>

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<p>Appendix 2.6</p> <p>Security of critical infrastructure step change – Fully confidential</p>	<p>Opex related to gaps, strategies, and costs associated with complying with security of critical infrastructure legislation</p>	<p>Operating expenditure critical infrastructure costs and security details</p>	<p>Market sensitive inputs, and security information</p>	<p>Contains market sensitive cost inputs, which affects Evoenergy's ability to obtain competitive prices in future transactions, including tender processes.</p> <p>Includes information affecting the security of Evoenergy's network, which, if made public, may jeopardise security of the network or a network service provider's ability to effectively plan and operate its network.</p> <p>There is limited disclosure obligations of protected information, outlined in section 43 of SOCI legislation.</p>	<p>May lead to anti-competitive tender processes.</p> <p>Identification of strategy may undermine the security of Evoenergy's network.</p>	<p>Evoenergy is not aware of any material public benefit in publicly disclosing this information.</p>

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Appendix 3.1 Averaging periods – Fully confidential	Cost of debt and risk free rate averaging periods nominated by Evoenergy.	Averaging periods nominated consisted with the rate of return instrument.	Market sensitive inputs	Contains market sensitive data.	The AER requires averaging periods to be provided on a confidential basis.	AER requested confidentiality.
Reset RIN documents						
Reset RIN Cover Letter Page 1	Staff contact details and signature	Reset RIN response cover letter	Personal information	This contains the names, contact information and signature of personnel.	This would raise privacy considerations for personnel therefore redacted as required by the AER.	AER requested confidentiality.

Table 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 that include information subject to a claim of confidentiality	Percentage of pages submission that do not include information subject to a claim of confidentiality
Overview for consumers	0	31	31	0%	100%
Regulatory proposal	0	79	79	0%	100%
Attachments to the regulatory proposal	0	248	248	0%	100%
Appendices to the regulatory proposal	4	322	326	1%	99%
Appendices to the attachments	137	1468	1605	9%	91%
Regulatory proposal models (number of)	0	14	14	0%	100%
Reset RIN Cover Letter	1	0	1	100%	0%
Total*	141	2162	2303	6%	94%

*Total excludes the Reset RIN Cover Letter, Document Index, and this Confidentiality Claim; Note: Models/Spreadsheets are counted as one page for this purpose.