

10.01.01 – Confidentiality claims

Regulatory Proposal



31 October 2014



Confidentiality template

Title, page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to	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).
<i>Demand Management</i>						
07.02.11 Ergon Energy DM Overview 2015-2020 Section 9.10.1 Page 45 table 12 Intersection \$ in rows 6-13 and columns 2-7 only	The material contains information about Ergon Energy's payments to customer owned embedded generators	Operating expenditure external payments	Market sensitive cost inputs Market intelligence	The information contains details relating to the cost of individual dedicated customer contracts. It may therefore advantage other providers of embedded generation services by giving them access to market-sensitive data. This may affect Ergon Energy's ability to obtain competitive prices for similar services in the future.	The information could be used by market forces to gain an understanding of what Ergon Energy is willing to pay for embedded generators and cause an inflated price for future contracts. It may be used by market forces for determining what competitors are offering for embedded generation contracts thus enabling market distortion. The information may be covered under the Ergon Energy contracts entered into with the generation supplier, and if so its disclosure would place Ergon Energy at risk of action for breach of contract.	The disclosure of the information may enable market forces to inflate the prices quoted for embedded generation based on previous contracts entered into by Ergon Energy. This would have an adverse impact on electricity prices which is not in the long term interests of consumers. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.

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<i>Asset Renewal</i>						
Expenditure category: ARW						
07.01.18 Engineering Report XLPE Service Cable Insulation Degradation Annex A page 31	Manufacturer names	Network capital expenditure	Other – litigation risk	Information relates to specific products which have been supplied by manufacturers and that have been assessed as having inherent problems. Disclosure of information which could identify the manufacturer may increase the risk of legal action being brought against Ergon Energy by the manufacturer e.g. if the manufacturer's reputation is affected by the disclosure, or if it suffers economic loss due to the effect of the disclosure on its sales.	<p>The naming of the manufacturers may put them at a disadvantage in the market place.</p> <p>This information may also adversely impact Ergon Energy by increasing the risk of legal action being brought against Ergon Energy by the manufacturer if the manufacturer's reputation is affected by the disclosure or if the disclosure results in economic loss to the manufacturer.</p>	<p>Affected stakeholders may wish to know the manufacturer of the services because the services are a known safety risk, and because the services may be in close proximity to affected stakeholders and their properties.</p> <p>However, there is little benefit in disclosing the information, because affected stakeholders do not have the knowledge or ability to identify the type of service that they are connected to, nor are they qualified to deal with the asset if they were to identify it. There are no additional prudent precautions that stakeholders can take to minimise the risk to them.</p> <p>Ergon Energy has clear</p>

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						<p>protocols in place to communicate known safety risks to the public when it is appropriate to do so. In this instance the public will receive little benefit from being able to identify the manufacturer and any benefit is outweighed by the possible detriment to Ergon Energy.</p> <p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>07.01.08 Engineering Report Instrument Transformer Replacement and Refurbishment</p> <p>Section 9.4, pp 16, 17</p>	<p>Incident investigation report</p>	<p>Network capital expenditure</p>	<p>Other – information subject to legal professional privilege</p>	<p>The information should be treated as confidential because the Preliminary Incident Report was prepared for the purpose of providing legal advice to Ergon Energy and its executive officers. The Preliminary Incident Report is</p>	<p>If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.</p>	<p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the</p>

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Annex B, pp 46, 47, 48				<p>subject to legal professional privilege. Ergon Energy does not waive privilege over the information.</p> <p>Powerlink has not advised agreement to use its confidential information.</p>		proposed expenditure.
<p>07.01.08 Engineering Report Instrument Transformer Replacement and Refurbishment</p> <p>Annex A, all rows except row 1, columns 2-5, Table 20 and Table 21, pp 38 and 39.</p>	Reference to Ergon Energy Benchmark Standards	Network capital expenditure	Market intelligence	<p>Ergon Energy/Energex developed intellectual property.</p> <p>Corporate Information that has commercial value and may be sold at a later date.</p>	Releasing the information will reduce the commercial value to almost nothing. The information may provide advantage to commercial enterprises for future non-regulated services. This will impact Ergon Energy's ability to obtain competitive market prices for future products and services.	The information is technical in nature and will not provide useful information to the public that assists them to assess the Regulatory Proposal. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
<p>07.01.05 Engineering Report Power Transformer Replacement and Refurbishment</p>	Reference to Ergon Energy Benchmark Standards	Network capital expenditure	Market intelligence	<p>Ergon Energy/Energex developed intellectual property</p> <p>Corporate information that has commercial value and</p>	Releasing the information will reduce the commercial value to almost nothing. The information may provide advantage to commercial enterprises for	The information is technical in nature and will not provide useful information to the public that assists them to assess the Regulatory Proposal. Substantial

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<p>program</p> <p>Section 9.1, Table 3, all rows except row 1, columns 2-5, p 18.</p> <p>Section 9.2, Table 4, all rows except row 1, columns 2-5, p 19.</p> <p>Section 9.4, Table 5, p 20, row 2-5, column 1.</p>				<p>may be sold at a later date.</p>	<p>future non-regulated services. This will impact Ergon Energy's ability to obtain competitive market prices for future products and services.</p>	<p>information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>07.01.17 Engineering report ACQ treated Laminated veneer Crossarms</p> <p>Section 9.1, pp 8, 9</p> <p>Section 10.1.1, p 14, Table 6, rows 5 and 6, column 4.</p>	<p>Details of incident investigations</p>	<p>Network capital expenditure</p>	<p>Other – information subject to legal professional privilege</p>	<p>The information should be treated as confidential because the investigations were carried out for the purpose of providing legal advice to Ergon Energy and its executive officers. The information is subject to legal professional privilege. Ergon Energy does not waive privilege over the information.</p>	<p>If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.</p>	<p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>07.01.02 Distribution Feeder Reconductoring</p>	<p>Details of safety incidents</p>	<p>Network capital expenditure</p>	<p>Other - information subject to legal professional privilege</p>	<p>The information should be treated as confidential because the investigations were carried out for the purpose of providing legal</p>	<p>If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.</p>	<p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited</p>

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<p>Program</p> <p>Section 6 Page 6 (paragraph 1), last sentence.</p> <p>Section 9.2, p 12 (final paragraph) Second and third sentence</p>				<p>advice to Ergon Energy and its executive officers. The information is subject to legal professional privilege. Ergon Energy does not waive privilege over the information.</p>		<p>amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>07.01.07 Engineering Report Circuit Breakers and Switchboards Replacement and Refurbishment</p> <p>Section 2, pp 6 and 7 – identified words</p> <p>Section 9.3 – 9.6, pp 17 and 18 – identified words</p> <p>Section 11.2, p 21 – identified words</p> <p>Section 12, pp 26-35 –</p>	<p>Manufacturer names and types</p>	<p>Network capital expenditure</p>	<p>Other – litigation risk</p> <p>Market intelligence</p>	<p>Information relates to specific products which have been supplied by manufacturers and that have been assessed as having inherent problems. Disclosure of information which could identify the manufacturer may increase the risk of legal action being brought against Ergon Energy by the manufacturer e.g. if the manufacturer's reputation is affected by the disclosure, or if it suffers economic loss due to the effect of the disclosure on its sales.</p>	<p>This naming of the manufacturers may put them at a disadvantage in the market place. This information may also adversely impact Ergon Energy by increasing the risk of legal action being brought against Ergon Energy by the manufacturer if the manufacturer's reputation is affected by the disclosure or if the disclosure results in economic loss to the manufacturer.</p>	<p>The assets described are contained within controlled areas of Ergon Energy's distribution network that are not accessible to the public. The public will therefore obtain little benefit in knowing the manufacturer.</p> <p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>

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<p>identified words</p> <p>Annex A and Annex B, pp 36-57 – identified words</p> <p>A.4.2, Table 30, p 44, all rows except first, column 3.</p> <p>A.4.2, Table 31 and 32, p 45, all rows except first, column 3.</p> <p>A.6, Table 38, p 55, all rows except header row, columns 1 and 2.</p> <p>A.6, Table 39, pp 56-57, all rows except header row, columns 1 and 2.</p>						
<p>07.01.07 Engineering Report Circuit Breakers and Switchboards Replacement and Refurbishment</p>	<p>Details of incident investigations</p>	<p>Network capital expenditure</p>	<p>Other - information subject to legal professional privilege</p>	<p>The information should be treated as confidential because the investigations were carried out for the purpose of providing legal advice to Ergon Energy and its executive officers. The</p>	<p>If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.</p>	<p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact</p>

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<p>Annex A.2.2, p 36, para 3.</p> <p>Annex A.2.8, p 41, para 1.</p> <p>Annex A.4.3, pp 45, 46 (last and first paragraphs)</p> <p>Annex A.6, pp 55, Table 38, rows 3 and 4, columns 5 and 6.</p> <p>Annex A.6, Table 39, pp 56 and 57, rows 3-7, columns 5 and 6.</p>				<p>information is subject to legal professional privilege. Ergon Energy does not waive privilege over the information.</p>		<p>the public's ability to understand or assess the proposed expenditure.</p>
<p>07.01.06 Protection relay Replacement Engineering Report</p> <p>Annex A.7, p 36, Table 15, row 2, all columns.</p> <p>Annex A.8, p 37, Table 16, all rows except row 1, columns 1 and 2.</p> <p>Annex A.8, pp 38-39,</p>	<p>Option details lists all problematic relays and types</p>	<p>Network capital expenditure</p>	<p>Other – litigation risk</p> <p>Market intelligence</p>	<p>Information relates to specific products which have been supplied by manufacturers and that have been assessed as having inherent problems. Disclosure of information which could identify the manufacturer may increase the risk of legal action being brought against Ergon Energy by the manufacturer e.g. if the manufacturer's</p>	<p>This naming of the manufacturers may put them at a disadvantage in the market place. This information may also adversely impact Ergon Energy by increasing the risk of legal action being brought against Ergon Energy by the manufacturer if the manufacturer's reputation is affected by the</p>	<p>The assets described are contained within controlled areas of Ergon Energy's distribution network that are not accessible to the public. The public will therefore obtain little benefit from being able to identify the manufacturer.</p> <p>Substantial information about the justification for this</p>

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Table 17, all rows except row 1, columns 1 and 2. Annex A.9, pp 40-42, Table 18, all rows except row 1, columns 1 and 2.				reputation is affected by the disclosure, or if it suffers economic loss due to the effect of the disclosure on its sales.	disclosure or if the disclosure results in economic loss to the manufacturer.	investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Expenditure category: OST						
07.04.01 Engineering Report Zone Substation Bunding Upgrade program Annex C, pp 24 – 29.	Legal Privilege Advice	Network capital expenditure	Other - information subject to legal professional privilege	The information should be treated as confidential because it contains Ergon Energy's legal advice on potential breaches of legislation. The advice is subject to legal professional privilege. Ergon Energy does not waive privilege over the information.	If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.	Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
07.04.02 Engineering Report AC Systems Annex A, p 15& 16, Table 4, columns 3 and 4, all rows except row 1. Annex A, p 17 & 18, Table 5, columns 3	Locations requiring AC system upgrades	Network capital expenditure	Other – reputational risk	The information relates to specific substation locations where a transfer of potential could occur, exposing the public to unsafe voltages under specific fault conditions. These identified safety risks are to be addressed through Ergon Energy's proposed capital	Disclosure of the information may cause unjustified concern amongst affected members of the public who live in the vicinity of the substations identified. The information could be easily misinterpreted as	Affected stakeholders may wish to know the location of the substations which have been identified as exhibiting a known safety risk, because there is a possibility that, under certain conditions, this could result in an electric shock to a member of the public who is in close

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and 4, all rows except row 1.				<p>expenditure.</p> <p>Disclosure of information which could identify the location may be mis-interpreted and could adversely impact Ergon Energy's reputation for safety.</p>	<p>suggesting that the location around the substation has a high likelihood of unexpected potential rise when this is not the case - the conditions under which a member of the public would experience a shock due to an earth potential rise at a substation are very rare.</p> <p>Misinterpretation of the information would adversely impact Ergon Energy's reputation for safety.</p>	<p>proximity to the substation.</p> <p>However the nature of the problem is that a member of the public cannot predict when such conditions would occur. There are no additional prudent precautions that stakeholders can take to minimise the risk to them.</p> <p>Ergon Energy has clear protocols in place to communicate known safety risks to the public. In this instance the public will have little benefit in being able to identify the location of these AC system issues and any benefit is outweighed by the possible detriment to Ergon Energy.</p> <p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential</p>

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						information will not impact the public's ability to understand or assess the proposed expenditure.
Expenditure category: HLV						
07.09.05 Management Plan Overhead and Underground Plant and Equipment Pages 25, 26 (last paragraph and first paragraph) Page 41 (paragraphs 2, 3 and 5)	Details of incident investigations	Network capital expenditure	Other - information subject to legal professional privilege	The information should be treated as confidential because the investigations were carried out for the purpose of providing legal advice to Ergon Energy and its executive officers. The information is subject to legal professional privilege. Ergon Energy does not waive privilege over the information.	If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.	Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
07.09.10 Management Plan Zone and Bulk Supply Substation Plant and Equipment Section 11.4, pp 62 and 64 – identified words. Section 11.6.1, p 66 –	Manufacturer Names and Types	Network capital expenditure	Other – litigation risk Market intelligence	Information relates to specific products which have been supplied by manufacturers and that have been assessed as having inherent problems. The disclosure of information which could identify the manufacturer may cause legal action to be brought against Ergon Energy by the manufacturer or another party, e.g. if the	Disclosure of information which may identify the manufacturers may put them at a disadvantage in the market place. This information may also adversely impact Ergon Energy by creating the risk that the manufacturer may bring an action against Ergon Energy because of the effect of the disclosure	The assets described are contained within controlled areas of Ergon Energy's distribution network that are not accessible to the public. The public will obtain little benefit in knowing the manufacturer and being able to identify assets that may create safety risks. Substantial information about

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<p>identified words</p> <p>Section 11.6.2, p 67 – identified words</p> <p>Section 11.7.2, pp 70 – 71 – identified words</p>				<p>manufacturer's reputation is affected by the disclosure, or if it suffers economic loss due to the effect of the disclosure on its sales.</p>	<p>on them.</p>	<p>the justification for this investment is disclosed throughout the document and so redaction of this limited amount of information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>07.09.10 Management Plan Zone and Bulk Supply Substation Plant and Equipment</p> <p>Section 10.4, p 49 (last two paragraphs)</p> <p>Section 11.4, p 62 (last paragraph).</p> <p>Section 11.4, P 63, last 3 paras</p>	<p>Details of incident investigations</p>	<p>Network capital expenditure</p>	<p>Other - information subject to legal professional privilege</p>	<p>The information should be treated as confidential because the investigations were carried out for the purpose of providing legal advice to Ergon Energy and its executive officers. The information is subject to legal professional privilege. Ergon Energy does not waive privilege over the information.</p>	<p>If the information was disclosed, it could be used against Ergon Energy in legal proceedings or prosecutions.</p>	<p>Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
Reference Documents						
<p>07.01.46 and 07.01.41 Lines and Substation</p>	<p>Complete Document</p>	<p>Network</p>	<p>Market intelligence</p>	<p>Ergon Energy/Energex developed intellectual</p>	<p>Releasing the information will reduce the commercial</p>	<p>The information is technical in nature and will not provide</p>

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Defect Classification Manuals (x2) – whole documents		capital expenditure		property Corporate Information that has commercial value and may be sold at a later date.	value to almost nothing. The information may provide advantage to commercial enterprises for future non-regulated services.	useful information to the public that assists them to assess the Regulatory Proposal.
Distribution Augmentation						
07.02.16 Ergon Energy Network Business Case Photovoltaic (PV) Augmentation Central <u>Page 5 - Section 2</u> Option Analysis <u>Page 8 – Section 4</u> Investment Implementation	These two sections describe considered credible options. Summary includes cost of studied options, NPV, risk, and a 20-year cash-flow. Also, proposed full investment implementation cost by categories, including labour and overheads is provided.	Network operating expenditure	Market sensitive cost inputs Market Intelligence	<u>Section 4</u> includes sensitive data about material cost and internal labour cost which may affect Ergon Energy's ability to obtain competitive prices on the market. <u>Section 2</u> includes NPV data which may also have same impacts on the business as data in Section 4. In addition, Section 2 includes general Ergon Energy philosophies in development of different options for PV assessments, which may advantage competitors for non-regulated services.	Ergon Energy is progressing with its effective market reform. The business competitors may use Ergon Energy expertise in planning of PV systems, as well as cost analysis of this relatively new, emerging and still not-well understood engineering area.	As the PV Business Case associates with very complex engineering matters, there is no public benefit in disclosing these sections. Substantial information about the justification for this investment is disclosed throughout the document and in other parts of the Regulatory Proposal and so redaction of this limited amount of information will not impact the public's ability to understand or assess the proposed expenditure.

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Alternative Control Services						
05.05.01 Inputs and assumptions for Alternative Control Services Appendix A, page 20, Tables 6 and 7	Labour rates (base) and fleet rates (base)	Alternative Control Services pricing	Market sensitive cost inputs	This is commercially sensitive information which provides the costs of Ergon Energy undertaking work itself (i.e. internal labour and fleet costs).	If publicly released, this information may provide an advantage to our competitors and adversely affect the market for certain materials and services Ergon Energy acquires from our suppliers and contractors.	Making our input prices known to competitors may weaken any existing competitive market for similar services in some areas and would be counter to the development of competition in service delivery.
05.06.01 ACS pricing inputs Page 1, rows 15 to 25, 35 to 48, and 59 to 72 (labour) Page 1, rows 80 to 88 and 93 to 101 (fleet)	Labour rates (base and inclusive of on-costs and overheads) and fleet rates (inclusive of overheads)	Alternative Control Services pricing	Market sensitive cost inputs	As per above	As per above	As per above

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<p>05.06.02 Fixed fee services model</p> <p>Page 4 (Inputs), rows 15 to 25, 35 to 48, and 57 to 70 (labour)</p> <p>Page 4 (Inputs), rows 78 and 83 (fleet)</p> <p>Page 5 (Assumptions), rows 11 to 32 (labour hours)</p>	<p>Labour rates (base and inclusive of on-costs and overheads) and fleet rates (inclusive of overheads)</p> <p>Assumed average travel time, time on the job and total time (hours)</p>	<p>Alternative Control Services pricing</p>	<p>Market sensitive cost inputs</p>	<p>As per above.</p>	<p>As per above</p>	<p>As per above</p>
<p>05.06.03 Quoted price services model</p> <p>Page 4 (Inputs), rows 15 to 25, 35 to 48, and 59 to 72 (labour)</p> <p>Page 4 (Inputs), rows 80 to 88 and 93 to 101 (fleet)</p> <p>Page 5 (Assumptions), rows 14 to 72 (labour hours and fleet hours)</p>	<p>Labour rates (base and inclusive of on-costs and overheads) and fleet rates (inclusive of overheads)</p> <p>Assumed average total time to perform illustrative service and assumed vehicle usage (hours)</p>	<p>Alternative Control Services pricing</p>	<p>Market sensitive cost inputs</p>	<p>As per above.</p>	<p>As per above</p>	<p>As per above</p>

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Proposed averaging periods						
08.02.04 Averaging period template Page 1 (table)	Time period when Ergon Energy will refinance debt in 2015–16, and the proposed approach to annual averaging periods in the remaining years of the regulatory control period 2015–20.	Rate of return	Market sensitive cost inputs	Ability to obtain competitive market rates for the refinancing of a significant debt portfolio within a specified timeframe.	<p>The Australian Energy Regulator's (AER) Rate of Return Guideline specifies that a network service provider can nominate the averaging period for estimating the prevailing rate of return of debt in the Framework and Approach. The Guideline specifies that the agreed averaging periods should be confidential.¹</p> <p>Given the size of the debt portfolio to be refinanced, pre-empting to the market the value and timing of when Ergon Energy would propose to refinance could influence the opportunity to achieve an efficient market rate.</p>	<p>As the cost of debt is a key input to the rate of return Ergon Energy receives on our assets, not receiving an efficient market rate will have a detrimental impact on the price customers will ultimately pay for the distribution of electricity.</p> <p>There is little public benefit from disclosing the averaging period, particularly when compared to the possible impact on customers if the averaging period is disclosed. The AER notes that opportunities for regulatory gaming are limited, to the extent that averaging periods are specified and agreed upon in advance.²</p>

¹ AER (2013), *Better Regulation, Rate of Return Guideline*, December 2013, p22.

² AER (2013), *Better Regulation, Explanatory Statement, Rate of Return Guideline*, December 2013, p133.

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<i>Operational Technology</i>						
Alternative Data Acquisition Strategy -2020 Section 6.3, p8, para 1,2,3.	The material contains information about Ergon Energy's SCADA and Operational Communications Network	Operational Use of SCADA and OCN	Information affecting the security of the network	The information contains operational and technical details on the SCADA and OCN which can be used to compromise the system and the power network	This information would allow a threat actor to plan specific areas of attack associated with SCADA and OCN. Information listed explains where SCADA is used and its limits, and how direct access to OCN can operate devices.	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Alternative Data Acquisition Strategy -2020 Section 8, p 13, " The overall strategy is to have an ADAS located on the Ergon Energy OCN to fill the data collection gap within the business." Section 8, Figure 1, p	The material contains information about Ergon Energy's SCADA and management and control of devices (iNOC)	Operational Use of SCADA and IEDs	Information affecting the security of the network	The information contains operational and technical details on the SCADA and network control strategies and be used to compromise the system and the power network	This information would allow a threat actor to plan specific areas of attack associated with SCADA and the low voltage network. Information listed explains where SCADA is used and its limits, how IEDs are managed and how control of the devices will occur.	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential

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<p>13. Section 8, Para 3, p 13.</p> <p>Section 8.6, p 15, para 2.</p> <p>Section 8.9, p 16 paragraphs 3, 4 & 5.</p>						<p>information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>Alternative Data Acquisition Strategy -2020</p> <p>Section 9.2, p 17. Section 9.6, p 18 Section 9.8, p 19.</p>	<p>The material contains information about Ergon Energy's data protocols and management and control of devices (iNOC)</p>	<p>Operational Use of IEDs</p>	<p>Information affecting the security of the network</p>	<p>The information contains operational and technical details on how IEDs communicate and network control strategies and be used to compromise the system and the power network</p>	<p>This information would allow a threat actor to plan specific areas of attack associated with the power network. Information listed explains used protocols, how IEDs are managed and how control of the devices will occur.</p>	<p>The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>Operational Technology Architecture and Environment Strategy 2020</p>	<p>The material contains information about Ergon's SCADA and control network</p>	<p>Operational Use of SCADA and Protection</p>	<p>Information affecting the security of the network</p>	<p>The information contains operational and technical details on scale and breadth of SCADA and be used to compromise the system and</p>	<p>This information would allow a threat actor to plan specific areas of attack associated with the power network. Information listed</p>	<p>The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the</p>

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Section 6, p 9, paragraph 3				the power network	defines reach of SCADA and number of potential recloser targets	public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Operational Technology Architecture and Environment Strategy 2020 Section 7.4, p 10.	The material contains information about Ergon's Security Practices	Security vulnerabilities in the OT environment	Information affecting the security of the network	The information contains security details and vulnerabilities	This information would allow a threat actor to plan specific areas of attack associated with the power network. Information listed defines security flaws for a targeted approach	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Operational Technology Architecture and	The material contains information about	Understanding of the operational	Information affecting the security of the	The information contains useful background details on the systems expectations in	This information would allow a threat actor to plan specific areas of attack	The loss of all or part of the power network associated with a specific attack would

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Environment Strategy 2020 Section 9.3, p 15. Section 9.4, p 15. Section 9.7, p 16.	Ergon's plans for the Operational Environment	environment	network	the OT environment and strategies to manage them.	associated with the power network. Information listed defines the design principles for the OT environment	be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Operational Technology Architecture and Environment Strategy 2020 Section 10.1, p 17 Section 10.3, p 18 Section 10.4, p 19 Section 10.5, dot points and para 2. Section 10.7, p 20.	The material contains information about Ergon's plans for the Operational Environment	Understanding of the operational environment	Information affecting the security of the network	The information contains useful background details on the systems expectations in the OT environment and strategies to manage them.	This information would allow a threat actor to plan specific areas of attack associated with the power network. Information listed defines the design principles for the OT environment	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Operational Network	The material	Understanding	Information	The information contains	This information would	The loss of all or part of the

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<p>Security Strategy</p> <p>Section 5, p 7. Section 6, p 7-9 Section 8, p 12-15 Section 9, p 15-23 Section 10. p 23</p>	<p>contains detailed information about Ergon's current security environment and plans for security in the Operational Environment</p>	<p>of security the operational environment</p>	<p>affecting the security of the network</p>	<p>details on the security systems, limitations and strategies OT environment.</p>	<p>allow a threat actor to plan specific and detailed attacks associated with the power network. Information listed provides very specific security information about the OT environment</p>	<p>power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.</p>
<p>10 Year 2015-2025 Master Station SCADA Strategy</p> <p>Section 5, p 7, paras 1,2,3,4,8,9. Section 6, p 9-11 Section 8.4, p 14-15. Section 8.6, p 16-17 Section 8.7, p 17</p>	<p>The material contains detailed information about Ergon's current and planned SCADA system</p>	<p>Understanding of technical makeup of the SCADA system</p>	<p>Information affecting the security of the network</p>	<p>The information contains detailed data including model numbers, vendor, architecture associated with the SCADA system</p>	<p>This information would allow a threat actor to plan specific and detailed attacks associated with the power network. Information listed provides very specific security information about SCADA</p>	<p>The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the</p>

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Section 9.2, p 20 Section 9.4, p 21-22 Section 9.5, p 23 Section 10, p 23-25						proposed expenditure.
Integrated Network Operations Centre (iNOC) Strategy Section 6, p 6-7	The material contains operational information about how the operational technology environment is used	Operational Impact on OCN	Information affecting the security of the network	The information contains details associated with the systems and how they are used to operate the power network.	This information would provide a threat actor useful background information to plan specific and detailed attacks associated with the power network.	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Integrated Network Operations Centre (iNOC) Strategy Section 7.1, 7.2, 7.3, p 7	The material contains technical information about operational and control systems and their support	Operational Impact on OCN	Information affecting the security of the network	The information contains details associated with the systems and how they are used to operate the power network as well as how it is supported.	This information would provide a threat actor specific information to plan detailed attacks associated with the power network.	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about

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Section 7.6, p 8.						the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Integrated Network Operations Centre (iNOC) Strategy Section 9.7, p 11.	The material contains operational strategy information about remote control of the network	Operational Impact on OCN	Information affecting the security of the network	The information contains details associated with the systems and how they are used to operate the power network as well as how it is supported.	This information would provide a threat actor specific information to plan detailed attacks associated with the power network.	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Integrated Network Operations Centre (iNOC) Strategy Section 10.1, 10.2, p	The material contains background information on how IEDs are managed	Operational Impact of IEDs on the network	Information affecting the security of the network	The information contains background details associated with IEDs and how they are used to operate the power network as well as	This information would provide a threat actor useful background information to plan specific and detailed attacks	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the

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12 Section 10.4, p 13 Section 10.5, p 13				how it is supported.	associated with the power network.	public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
DMS Strategy Section 7 paragraphs 4,5,7&8, p 7-8 Section 8 Figure 2, p 9.	The material contains background associated with the control centres and switching operations	Operational Impact of the power network	Information affecting the security of the network	The information contains background details associated with switching operations and the control centres that have a direct impact on the power network	This information would provide a threat actor useful background information on how many outages Ergon has annually and how to focus an attack based upon busy control centre staff.	The loss of all or part of the power network associated with a specific attack would be severely detrimental to both Ergon Energy and the public. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Network Control Strategy - Section 6.3	The material contains specific ways to defeat	Operational Impact (load stability) of the	Information affecting the security of the	The information contains details associated with the operation of AFLC and	This information would provide a threat actor with targeted information on	The loss of all or part of the power network associated with a specific attack is a

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	AFLC which is used to switch load on/off the network.	power network	network	specifically how it can operate incorrectly. This will have a direct impact on the power network	how to over-ride or defeat switching of load on the network, causing overloads and outages.	significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Network Control Strategy - Section 9, Section 10	The material contains specific information including vendor associated with Ergon's SCADA system.	Understanding of technical makeup of the SCADA system	Information affecting the security of the network	The information contains detailed data including numbers of devices, vendor, and operational information associated with the SCADA system	This information would allow a threat actor to plan specific and detailed attacks associated with the power network. Information listed provides very specific security information about SCADA	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the

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						proposed expenditure.
Doc – Network Control Strategy - Section 11 paragraphs 7-13	The material contains specific information associated with IEDs that control power on the network.	Understanding the number of IEDs	Information affecting the security of the network	The information contains data associated with the number of controllable protection devices across the network (outside the substations)	This information would allow a threat actor to plan specific and targeted attacks against protection devices on the power network.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Sensitive Earth Faults Protection Strategy - Section 5 paragraph 4, Section Annex A.1, A.2 & A.4- Safety incidents	The material contains specific information associated with IEDs that control power on the network.	Understanding the number of IEDs	Information affecting the security of the network	The information contains data associated with the number of and location of controllable protection devices across the network	This information would allow a threat actor to plan specific and targeted attacks against protection devices on the power network.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited

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						amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Protection Review Rectification Strategy - Table 1 Pages 9-13 Column 2, 8-10	The material contains specific information associated with IEDs that control power on the network.	Understanding the number of IEDs	Information affecting the security of the network	The information contains data associated with the number of and location of controllable protection devices across the network	This information would allow a threat actor to plan specific and targeted attacks against protection devices on the power network.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Regulator Remote Comms Strategy - Section 8.1 Page 11-12, Section 12 Page 16-17, Section 14 (all references to Coopers	The material contains specific information associated with IEDs that regulate voltage on the network.	Understanding the number and type of IEDs	Information affecting the security of the network	The information contains data associated with the number of and specific type of controllable voltage regulating devices across the network and their communications capability	This information would allow a threat actor to plan specific and targeted attacks against voltage regulating devices on the power network.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the

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product)						justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Management Plan Protection and Control - Section 8.1, 8.2, 8.7.2 Table 5 column 1&2, Table 6 column 1&2	The material contains specific information associated with IEDs that provide protection on the network.	Understanding the number and type of IEDs	Information affecting the security of the network	The information contains data associated with the number of and specific type of protection devices across the network and their capability	This information would allow a threat actor to plan specific and targeted attacks against protection devices on the power network.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Management Plan Protection and Control - Section 9.1,	The material contains detailed and specific	Understanding the SCADA system	Information affecting the security of the	The information contains detailed data including model numbers, vendor, number of	This information would allow a threat actor to plan specific and detailed	The loss of all or part of the power network associated with a specific attack is a

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9.2, 9.4, 9.7.2 Multiple locations - RTU replacement program	information associated with SCADA and substation RTUs on the network.		network	devices associated with the SCADA system as well as model numbers and quantity of RTUs in substations as well as security issues.	attacks associated with the power network. Information listed provides very specific security information about SCADA and its weaknesses.	significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Audio Frequency Load Control Strategy - Section 1.1.2, 1.1.6, Section 5, Section 6 (Introduction), Section 7.1 (paragraphs 1-3) Section 7.2 (paragraph 6), Figure 1 & 2, Section 7.6, 7.9, Annex A	The material contains specific ways to defeat AFLC which is used to switch load on/off the network.	Operational Impact (load stability) of the power network	Information affecting the security of the network	The information contains details associated with the operation of AFLC including model numbers, receiver protocols and locations where they are used. This will have a direct impact on the power network	This information would provide a threat actor with targeted information on how to over-ride or defeat switching of load on the network, causing overloads and outages.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the

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						proposed expenditure.
Doc – Engineering Report RTU Replacement Program - Section 4.1 Page 5, Section 6 page 6, Section 9 (including table 1) page 7&8, Section 10.1 (including Table 2) Page 9 Section 10.3 (Table 4) Page 10.11&12, Section 11.1 Page 12, Section 11.2 Page 13	The material contains detailed and specific information associated with substation RTUs on the network.	Understanding the RTU subsystem	Information affecting the security of the network	The information contains detailed data including model numbers, vendors, number of devices associated with RTUs in substations as well as issues which can be exploited	This information would allow a threat actor to plan specific and detailed attacks associated with the power network. Information listed provides very specific security information about substation RTUs and their weaknesses.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Management Plan Network Operations - Section 7.1	The material contains specific information associated with OCC operations including staffing	Understanding the OCC	Information affecting the security of the network	The information contains operational data associated with how the Operational Control Centres manage the power network, including staffing.	This information would allow a threat actor to plan an attack utilising the knowledge of how the OCCs operate the state based upon location.	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited

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						amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Management Plan Network Operations - Section 7.2, 8.1, 8.5,	The material contains specific reference to the equipment and data rooms in Rockhampton and Townsville	Understanding the Operational Technology equipment environment	Information affecting the security of the network	The information contains references to the locations of Ergon's SCADA, Telecommunications and OT hubs (Rocky and Townsville)	This information would allow a threat actor to plan an attack specifically at the operation of the network, by compromising the OT infrastructure (SCADA, Telco etc)	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
Doc – Forecast Expenditure Summary Other System and Enabling Technologies 2105-2020 – Section 4.2.6 paragraph 5 (Security initiatives)	The material contains detailed information about Ergon's current security environment and plans for security in	Understanding of security the operational environment	Information affecting the security of the network	The information contains details of the security strategies planned for the OT environment.	This information would allow a threat actor to plan specific and detailed attacks associated with the power network. Information listed provides very specific security information about	The loss of all or part of the power network associated with a specific attack is a significant risk to the safety, security and reliability of the network. Substantial information about the

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	the Operational Environment				the OT environment	justification for this investment is disclosed throughout the document and so redaction of this limited amount of confidential information will not impact the public's ability to understand or assess the proposed expenditure.
<i>Ergon Energy Parametric Insurance</i>						
<p>Parametric Insurance (in support of the Operating Expenditure Chapter)</p> <p>Redact the following content:</p> <ul style="list-style-type: none"> • Page 8, paras. 3&4 • Page 10, para. 2, Table 1 • Page 12, para. 1 & 3, Table 2, Table 3 • Page 12, para 1 • Page 13, para.1, Tables 3&4 	Information related to Ergon Energy's forecast cost of obtaining parametric insurance	Parametric Insurance	Strategic Information	Should information on Ergon Energy's forecast cost of parametric insurance be released publically, this may influence the price offered by insurance providers, potentially costing Ergon Energy more than it would otherwise be paying. This cost would be passed on to consumers.	Should Ergon Energy release this information, insurance providers may base any fee estimates on what Ergon has indicated it expects to pay, rather than what market rates would allow. Where there is a difference between market rates and forecast rates, additional cost to Ergon Energy may be incurred, which is likely to be passed on to consumers through operating expense allowance.	It is in the long term interest of the public to pay an economically efficient rate for electricity usage. By allowing insurance companies to access information on Ergon Energy's expected cost of insurance, this may result in an economically inefficient price being offered to Ergon Energy, and hence passed through to consumers.

Title, page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to	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).
<ul style="list-style-type: none"> Page 14, paras. 1&2, Tables 4&5 						
<i>AON Parametric Insurance</i>						
<p>Aon – <i>Insurance and Risk Management Discussion Paper for wind risks associated with pole and wire assets</i>, Ergon Energy, Jointly Prepared by Aon and Risk Solutions International.</p> <p>Page 1 (Para. 7)</p> <p>Page 4 (Paras.3,4)</p> <p>Page 5 (Para. 1)</p> <p>Appendix 1 (Whole document)</p>	Information related to Ergon Energy's forecast cost of obtaining parametric insurance	Parametric Insurance	Strategic Information	Should information on Ergon Energy's forecast cost of parametric insurance be released publically, this may influence the price offered by insurance providers, potentially costing Ergon Energy more than it would otherwise be paying. This cost would be passed on to consumers.	Should Ergon Energy release this information, insurance providers may base any fee estimates on what Ergon has indicated it expects to pay, rather than what market rates would allow. Where there is a difference between market rates and forecast rates, additional cost to Ergon Energy may be incurred, which is likely to be passed on to consumers through operating expense allowance.	It is in the long term interest of the public to pay an economically efficient rate for electricity usage. By allowing insurance companies to access information on Ergon Energy's expected cost of insurance, this may result in an economically inefficient price being offered to Ergon Energy, and hence passed through to consumers.

Title, page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to	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).
<i>AON Self Insurance Forecasts</i>						
<p>Aon, <i>Self Insurance Risk Quantification, Ergon Energy, August 2014</i></p> <ul style="list-style-type: none"> • Page 1, Table 1, para 6 • Page 2, Table 2, paras. 5&6 • Page 10, paras. 5,6,&10 • Page 12, Table 4, para. 5 • Page 13, Table 5 • Page 14, Table 6, paras. 4&15 • Page 15, Table 8 • Appendix A1.1 • Appendix A1.2 	Information related to Ergon Energy's forecast cost of self-insurance	Insurance Programme	Strategic Information	Should information on Ergon Energy's forecast cost of self-insurance be released publically, this may influence the price offered by insurance providers, potentially costing Ergon Energy more than it would otherwise be paying. This cost would be passed on to consumers.	Should Ergon Energy release this information, insurance providers may base any fee estimates on what Ergon has indicated it expects to pay, rather than what market rates would allow. Where there is a difference between market rates and forecast rates, additional cost to Ergon Energy may be incurred, which is likely to be passed on to consumers through operating expense allowance.	It is in the long term interest of the public to pay an economically efficient rate for electricity usage. By allowing insurance companies to access information on Ergon Energy's expected cost of self-insurance, this may result in an economically inefficient price being offered to Ergon Energy, and hence passed through to consumers.

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
Regulatory Proposal 2015-2020	248 pages And Various cells and rows in 102 non-PDF material	8,301	8,549	3%	97%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in Ergon Energy's 2015-20 Regulatory Proposal (including its attachments and appendices) that is subject to a claim of confidentiality compared to that which is not.

10.01.01 Confidentiality claims Submission / Re-Set RIN

31 October 2014



10.01.01-CONFIDENTIALITY CLAIMS SUBMISSIONS RIN – RESET RIN – ERGON ENERGY

Attachment 1 - Confidentiality template

Title, page and paragraph number of document containing the confidential information	Description of the confidential information.	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Identify the recognised confidentiality category that the confidential information falls within.	Provide a brief explanation of why the confidential information falls into the selected category. If 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).
<i>RR ACS Workbook – Labour Rates</i>						
0C.04.02 – ACS Workbook 0C.04.03 – ACS Workbook 0C.04.04 – ACS Workbook	Labour rates	Alternative Control Services pricing	Market sensitive cost inputs	This is commercially sensitive information which provides the costs of Ergon Energy undertaking work itself (i.e. internal labour and fleet costs).	If publicly released, this information may provide an advantage to our competitors and adversely affect the market for certain materials and services Ergon Energy acquires from our suppliers and contractors.	Making our input prices known to competitors may weaken any existing competitive market for similar services in some areas and would be counter to the development of competition in service delivery.
<i>Payments to Embedded Generators</i>						
Doc – 07.02.11 Demand Management Overview 2015 to 2020 Section 9.10.1 Pg 46 AND Associated document Embedded generators.xlsx	The material contains information about Ergon Energy's payments to customer owned embedded generators	OPEX expenditure external payments	Market sensitive cost inputs Market intelligence	The information contains details relating to dedicated customer contracts that may be covered by confidentially clauses in the customer contracts.	The information could be used by market forces to: Gain an understanding of what Ergon Energy is willing to pay for embedded generators and enable an inflated the price for future contracts. It may be used by market forces for determining what competitors are offering for embedded generation contracts thus enabling market distortion or intelligence. The information may be covered under the Ergon Energy contracts entered into with the generation supplier.	The disclosure of the information may enable market forces to inflate the prices quoted for embedded generation based on previous contracts entered into by Ergon Energy. The disclosure of information may breach Ergon Energy customer contracts and expose Ergon Energy to legal risks. AUSgrid's AER submission claimed confidentially over the same required information and the confidentially was granted.
<i>Related Parties - EET</i>						
Agreement Supporting the Operations of Ergon Energy Telecommunications Pty Ltd Page 2 para 1.1	Name of customer.	Customer name.	Confidential Information.	Customer privacy and strategic information	Customer privacy and undermining of EET business. Undermining of EET business could mean smaller dividends to the Queensland Government and the people of Queensland.	Customer privacy. No benefit in consumers knowing. Disclosure of the information could lead to a wealth transfer from the people of Queensland to EET customers.
Page 5 Table 1	Pricing information, including percentage margin and dollar costs.	Pricing information, including percentage margin and dollar costs.	Financial Information	The information is percentage margin and dollar costs.	If released publicly customers would know EET costs and margin, this could undermine the EET profit, which could mean smaller dividends to the Queensland Government and the people of Queensland.	Disclosure of the information could lead to a wealth transfer from the people of Queensland to EET customers.
Page 9 para (f)	Pricing information on EET costs	Pricing information on EET costs	Financial Information	Pricing information on EET costs	If released publicly customers would know EET costs, this could undermine EET profit, which could mean smaller dividends to the Queensland Government and the people of Queensland	Disclosure of the information could lead to a wealth transfer from the people of Queensland to EET customers.
Page 10 para (d)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)

10.01.01-CONFIDENTIALITY CLAIMS SUBMISSIONS RIN – RESET RIN – ERGON ENERGY

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).
Page 11 para (h)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)	As per Page 9 para (f)
Page 15&16 para (c)	Name of supplier - indemnity	Name of supplier - indemnity	Confidential Information.	Supplier privacy & strategic information.	Supplier privacy and undermining of EET business. Undermining of EET business could mean smaller dividends to the Queensland Government and the people of Queensland.	Supplier privacy. No benefit in consumers knowing. Disclosure of the information could lead to a wealth transfer from the people of Queensland to EET customers.
Page 17 para 8.2(e)	Name of supplier - indemnity	Name of supplier - indemnity	Confidential Information.	Supplier privacy & strategic information.	Supplier privacy and undermining of EET business. Undermining of EET business could mean smaller dividends to the Queensland Government and the people of Queensland	Supplier privacy. No benefit in consumers knowing. Disclosure of the information could lead to a wealth transfer from the people of Queensland to EET customers.
Schedule 3	Pricing information on EET revenues	Pricing information on EET revenues	Financial Information	Pricing information on EET revenues	If released publicly customers would know EET contract revenues, this could undermine EET profit, which could mean smaller dividends to the Queensland Government and the people of Queensland	Disclosure of the information could lead to a wealth transfer from the people of Queensland to EET customers.
<i>Schedule 1</i>						
RESET RIN, Schedule 1 – Section 11 Risk Management and Insurance. <ul style="list-style-type: none"> • Page 105, paras. 1,2,3,4 • Page 106, paras. 1,5,7 • Page 107, paras. 1,3,5 • Page 108, paras. 1,4,5 • Page 109, para. 2 • Page 110, paras, 2,5 • Page 111, paras. 1,2,4,5 • Page 112, paras. 1,4,5 	Information related to Ergon Energy's Insurance Programme i.e. policy limits and sub-limits of liability	Operating Expenditure Insurance –	Strategic Information	Should information on Ergon Energy's insurance programme i.e. policy limits and sub-limits of liability be released publically, this may influence the nature, price and terms of coverage offered by insurance providers, potentially costing Ergon Energy more than it would otherwise be paying and/or effect the nature of cover that can be obtained. Any increase in costs and/or reduction in level and type of cover would be passed on to consumers.	Disclosure of insurance policy limits and sub-limits of liability to insurers, customers or other stakeholders has the potential to have a detrimental impact on the terms on which insurance is obtained. A key role of Ergon Energy's Board is to set the level of risk (i.e. appetite) which it is prepared to accept in pursuing the organisation's and ultimately stakeholders' objectives. In an insurance context this means setting appropriate limits of liability which adequately mitigate the financial consequences of insurable risks.	

10.01.01-CONFIDENTIALITY CLAIMS SUBMISSIONS RIN – RESET RIN – ERGON ENERGY

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).
<p>Aon – Insurance Premium Forecast, Ergon Energy, September 2014.</p> <ul style="list-style-type: none"> • Page 1, Table 1 • Page 4, Table 2 • Page 5, paras. 3&4 • Page 7, Chart 1, Para. 1, Table 3 • Page 8, paras. 4&5 • Page 9, para 1(including the chart), Chart 2 • Page 10, Chart 3 • Page 11, Table 4 • Page 12, para. 4 • Page 13, Table 5 • Page 14, para. 2, Table 6 • Appendix A1.1 • Appendix A1.2 • Appendix A1.3 • Appendix A1.4 • Appendix A1.5 	<p>Information related to the forecast cost of Ergon Energy's Insurance Programme</p>	<p>Insurance Programme</p>	<p>Strategic Information</p>	<p>Should information on the forecast cost of Ergon Energy's Insurance Programme be released publically, this may influence the price offered by insurance providers, potentially costing Ergon Energy more than it would otherwise be paying. This cost would be passed on to consumers.</p>	<p>Should Ergon Energy release this information, insurance providers may base any fee estimates on what Ergon has indicated it expects to pay, rather than what market rates would allow. Where there is a difference between market rates and forecast rates, additional cost to Ergon Energy may be incurred, which is likely to be passed on to consumers through operating expense allowance.</p>	
<p>Aon, Self Insurance Risk Quantification, Ergon Energy, August 2014</p> <ul style="list-style-type: none"> • Page 1, Table 1, para 6 • Page 2, Table 2, paras. 5&6 • Page 10, paras. 5,6,&10 • Page 12, Table 4, para. 5 • Page 13, Table 5 • Page 14, Table 6, paras. 4&15 • Page 15, Table 8 • Appendix A1.1 • Appendix A1.2 	<p>Information related to Ergon Energy's forecast cost of self - insurance</p>	<p>Insurance Programme</p>	<p>Strategic Information</p>	<p>Should information on Ergon Energy's forecast cost of self-insurance be released publically, this may influence the price offered by insurance providers, potentially costing Ergon Energy more than it would otherwise be paying. This cost would be passed on to consumers.</p>	<p>Should Ergon Energy release this information, insurance providers may base any fee estimates on what Ergon has indicated it expects to pay, rather than what market rates would allow. Where there is a difference between market rates and forecast rates, additional cost to Ergon Energy may be incurred, which is likely to be passed on to consumers through operating expense allowance.</p>	<p>It is in the long term interest of the public to pay an economically efficient rate for electricity usage. By allowing insurance companies to access information on Ergon Energy's expected cost of self-insurance, this may result in an economically inefficient price being offered to Ergon Energy, and hence passed through to consumers.</p>

10.01.01-CONFIDENTIALITY CLAIMS SUBMISSIONS RIN – RESET RIN – ERGON ENERGY

Attachment 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
Re-Set RIN Submission	45 pages plus cells/rows in 20 non-PDF documents	1,582	1,627	3%	97%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in Ergon Energy's Re-set RIN Submission that is subject to a claim of confidentiality compared to that which is not.