



# Jemena Gas Networks (NSW) Ltd

## 2020-25 Access Arrangement Proposal

Attachment 1.4

Confidentiality claims



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## 1. Access Arrangement proposal confidentiality claims

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidentiality information	Why the identified detriment is not outweighed by the public benefit
<b>Attachment 4.1 Our reference service and tariffs</b>						
Table 6-1, Rows “DC-5, DMT-5” and “DC-9”, pages 31-32.	Expected revenue	Efficient pricing	Other	The tariff class groupings identified have three or less customers which could potentially enable revenue from individual customers to be identified.	This is confidential information related to customers’ bills.	This is confidential information related to customers’ bills. There is no public benefit to identifying this customer information.
Table 6-4, both rows, page 38	JGN’s prudent discount values	Prudent discounts	Other	This is confidential information related to customers’ bills and the rationale for the discount which discloses that customer’s competitively sensitive information.	This is confidential information related to customers’ bills.	This is confidential information related to customers’ bills. There is no public benefit to identifying this customer information.
<b>Attachment 5.1 Capital expenditure</b>						
Section 3.3.2 last paragraph, page 20, and first five paragraphs, page 21,	Supplier names and models	Metering expenditure	Market sensitive cost inputs and strategic information	Publication of this information would affect JGN’s ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices	We provide our views on the asset performance of specific meters from particular suppliers. Publishing this information may affect suppliers willingness to supply meters and work with us.	Publication of this information would be harmful (and result in potential cost increases that would flow through to higher bills) and there is no public benefit to identifying particular suppliers and their products.

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Page 21, paragraph 3	Outcome of a negotiated agreement	Metering expenditure	Market sensitive cost inputs and strategic information	Publication of this information would affect JGN's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices	Publication of this information would harm JGN's ability to negotiate resolutions to supplier issues. It would also harm JGN's ability to negotiate competitively priced meters in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.
Section 3.4.5, paragraph 3, page 30	Changes in the pigging market	Pigging costs	Market sensitive cost inputs and strategic information	Publication of this information would affect JGN's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices	Publication of this information may influence tenders in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.

#### **Attachment 6.1 Operating expenditure**

Section 3.1.2, paragraph 4, bullet point 1, page 7	Average contract price for unaccounted for gas (UAG)	Future UAG costs	Market sensitive cost inputs	Revealing JGN's average UAG price and estimation technique would diminish JGN's ability to obtain competitive UAG prices	JGN considers that these details should remain confidential so as to not disadvantage JGN (and therefore its customers) when procuring this gas via competitive tender.	As UAG is a pass through item, JGN's customers would be worse off should JGN's tendering position deteriorate.
Section 3.1.2, paragraph 4, bullet point 1, page 7	Overspend due to higher wholesale	Future UAG costs	Market sensitive cost inputs	Revealing overspend due to higher wholesale price amounts enables the UAG price to be back calculated. JGN's UAG price	JGN considers that these details should remain confidential so as to not disadvantage JGN (and therefore its customers) when	As UAG is a pass through item, JGN's customers would be worse off should JGN's tendering position deteriorate.

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	price amounts			would diminish JGN's ability to obtain competitive UAG prices.	procuring this gas via competitive tender.	
Section 3.1.2, paragraph 4, bullet point 2, page 7	Overspend due to volume of UAG	Future UAG costs	Market sensitive cost inputs	Revealing overspend due to the volume of UAG enables the UAG price to be back calculated. JGN's UAG price would diminish JGN's ability to obtain competitive UAG prices.	JGN considers that these details should remain confidential so as to not disadvantage JGN (and therefore its customers) when procuring this gas via competitive tender.	As UAG is a pass through item, JGN's customers would be worse off should JGN's tendering position deteriorate.
Section 8.1, paragraph 3, bullet point 3, and footnote 20, page 18	Method for estimating the cost of replacement gas	Future UAG costs	Market sensitive cost inputs	Revealing JGN's average UAG price and estimation technique would diminish JGN's ability to obtain competitive UAG prices.	JGN considers that these details should remain confidential so as to not disadvantage JGN (and therefore its customers) when procuring this gas via competitive tender.	As UAG is a pass through item, JGN's customers would be worse off should JGN's tendering position deteriorate.

#### Attachment 6.2 Operating expenditure forecasting model

Worksheet 'Confidential Calc UAG'	Average forecast wholesale contract price for unaccounted for gas (UAG)	Future UAG costs	Market sensitive cost inputs	Revealing forecast average UAG price and estimation technique would diminish JGN's ability to obtain competitive UAG prices	Revealing this information could inhibit procuring this gas at competitive rates and increase operating costs which are passed on to customers	Higher costs and prices are not in the interests of customers.
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#### Attachment 7.1 Revenue and price path

<b>Title page and paragraph number of the document</b>	<b>Description of the confidential information</b>	<b>Topic the confidential information</b>	<b>Confidentiality category</b>	<b>Why the confidential information falls into the selected category</b>	<b>How and why detriment would be caused from disclosing the confidentiality information</b>	<b>Why the identified detriment is not outweighed by the public benefit</b>
Section 8.1, Table 8-1, Second last row, page 13	Non-reference service revenue for a single customer.	Non-reference service revenue	Other	The non-reference service revenue relates to three or less customers which could potentially enable revenue received from individual customers to be identified.	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers receiving the non-reference service.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.
Section 8.1, Table 8-1, Last row, page 13	Total pipeline services revenue	Revenue	Other	To ensure that the non-reference service revenue (see row above) cannot be back-calculated, it is necessary to make this row confidential.	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers receiving the non-reference service.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.

#### **Attachment 7.2 JGN PTRM**

Rows 568, 569 612, 616, 619, 624, 633, 634, 640, 643, 644, 690, 694, 697, 702, 711, 712, 718, 721, 722 in 'PTRM input worksheet (rows associated with DC5,	Price and volume information	Revenue	Market sensitive information and Personal information	The tariff classes identified have three or less customers which is published could potentially enable the price, demand and revenue from individual customers to be identified	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers on these tariff categories.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.
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DC9, DMT1, DMT2, DCFR1, DCFR6, DMTFR3 and Prudential Discounts)						
Rows 28, 32, 35, 40, 49, 50, 56, 59, 60, 137, 138, 183, 187, 190, 195, 204, 205, 211, 214, 215 in 'Forecast Revenues' worksheet (rows associated with DC5, DC9, DMT1, DMT2, DCFR1, DCFR6, DMTFR3 and Prudential Discounts)	Price and volume information	Revenue	Market sensitive information and Personal information	The tariff classes identified have three or less customers which if published could potentially enable the demand from individual customers to be identified	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers on these tariff categories	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.

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<b>Attachment 7.8 Averaging period proposal</b>						
Section 1.2, Table 1-1, column 2, page 4 Section 1.3, paragraph 1, page 4	Return on debt and equity averaging periods for the 2020-25 AA period	Rate of return	Market sensitive cost inputs	The averaging periods relate to commercially sensitive information about SGSPAA's refinancing and hedging window, and portfolio growth modelling that is not available in public domain.  Stakeholders do not require this information in order to understand and assess the substance of all issues arising in JGN's AA proposal.	It may harm JGN's ability to procure competitively priced finance and impact legitimate commercial interests of the SGSPAA group.	There is no public benefit to identifying this market sensitive information. The long term interests of consumers would not be served by increasing finance costs of service providers.
<b>Attachment 8.3 Demand forecast model</b>						
Whole model	Core Energy proprietary methodology	Core Energy demand and customer forecasts	Personal information and Other	Model contains proprietary information that if disclosed would provide an advantage to Core Energy's competitors.  Contains easily identifiable personal and/or confidential information relating to individual customer demand.	Core Energy operates in a competitive market, and disclosing its proprietary information would provide an advantage to its competitors.  Competitors to our individual customers that operate in competitive markets may also be advantaged. Information was	JGN's customers would be detrimentally impacted if the intellectual property contained in successful tender bids was released. This would diminish the incentive of potential tenderers to develop intellectual property, which would be detrimental to the quality of experts available to the AA process.  Additionally, the model includes private and/or confidential information relating to



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					sought from these customers on a confidential basis.	individual customers' demand and/or bills.

## 2. Proportion of confidential information

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No 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
2020 Plan and 2020 Plan summary	0	124	124	0%	100%
2020-25 AA and RSA	0	183	183	0%	100%
2020 Plan attachments	43	2,462	2,505	1.72%	98.28%
<b>Total</b>	<b>43</b>	<b>2,769</b>	<b>2,812</b>	<b>1.53%</b>	<b>98.47%</b>