



Jemena Gas Networks (NSW) Ltd

Revised 2020-25 Access Arrangement Proposal

Attachment 1.2

Confidentiality claims



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1. Revised 2020-25 Access Arrangement Proposal confidentiality claims

Title page and paragraph number of the document	Description of the confidential information	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidentiality information	Why the identified detriment is not outweighed by the public benefit
Attachment 4.2 Response to the AER's draft decision - Capital expenditure						
Section 1.5, page 9-11.	Capex	Connections capex	Market sensitive cost inputs and confidential unit rates reference	<p>This information contains information about supplier prices and our unit costs which, if published, could affect JGN's ability to obtain competitive prices in future procurement processes.</p> <p>This information contains confidential unit rates reference.</p>	<p>Revealing information about unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.</p> <p>Public disclosure could potentially harm the third-party's commercial interests.</p>	<p>While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.</p> <p>JGN is not aware of any public benefit in publicly disclosing this information</p>
Section 1.5, page 12	Capex	Connections capex	<p>Market sensitive cost inputs and strategic information</p> <p>Personal Information and others</p>	<p>This information contains information about contractor unit rates which, if published, could affect JGN's ability to obtain competitive prices in future procurement processes.</p>	<p>Public disclosure of contractor costs for particular types of materials or services could harm JGN's legitimate business interests and ultimately increase costs passed onto customers.</p>	<p>JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.</p>

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				Information also provided on specific developments not yet in the public domain	Public disclosure could potentially harm JGN and the third-party's commercial interests.	
Section 1.5, pages 13-14	Capex	Connections capex	Confidential mains meters data	This information contains confidential mains meters data reference.	Public disclosure could potentially harm the third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information
Section 1.5, page 15	Capex	Connections capex	Personal Information	Detailed information provided on specific developments not yet in the public domain	Public disclosure could potentially harm JGN and the third-party's commercial interests	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Section 2.1.4, page 21-22	Capex	Meter replacement capex	Strategic information	Publication of this information would affect JGN's relationship with its vendor and may detrimentally impact JGN's ability to negotiate fair market prices in future.	We provide meter testing results and 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.
Section 5.1.2, page 43	Capex	Augmentation	Strategic information	Information contains specific customer information. Under Part 16 of the National Gas Rules we must not disclose this information.	Public disclosure could potentially harm JGN and the third-party's commercial interests and would not comply with the National Gas Rules.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.

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Section 5.1.4, page 48	Capex	Augmentation	Personal 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	Public disclosure could potentially harm JGN and the third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Section 5.2, page 51	Capex	Augmentation	Strategic information	Detailed information provided on the requirements of a specific customer, not yet in the public domain. Under Part 16 of the National Gas Rules we must not disclose this information.	Public disclosure could potentially harm JGN and the third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Attachment 4.3 Response to the AER's draft decision - Property costs, overheads and inflation in the capex and roll-forward models						
Section 1.2.2, page 3	Supplier names and models	Metering	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.
Attachment 4.5 Connections and meter replacement capex source information						
Connections and metering capex	Capex – Connection and	Capex – Connection	Market sensitive cost inputs	This information contains underlying (contractor)	Revealing unit rates for procuring particular types of	While the detriment of publishing the information is

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forecasting models	Meter replacement forecast	and Meter replacement forecast		labour costs which, if published, could affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Metering volumes forecasting model	Meter replacement volumes by types	Capex – meter volumes forecast	Market sensitive cost inputs	Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to JGN's outsourcing arrangements (including structure and activity) are commercially confidential to JGN and could harm JGN's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.

Attachment 4.7 IT Capex Source Information

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<p>IB –MDL Metering Backend page 4 – Background – vendor name and Technology dot points</p> <p>Page 5 – Background – vendor name and Business Continuity section</p> <p>Page 6 – Customer Importance - Last two paragraphs</p> <p>Page 6 – Current IT Systems - third dot point</p> <p>Page 8 – Option 1 – Qualitative risk - second paragraph</p> <p>Page 9 - vendor name</p>	<p>Details relating to an aging, cyber-security exposed technology platform</p> <p>JGN’s ongoing relationship with a vendor</p> <p>Specific customer situations are quoted</p>	<p>ICT</p>	<p>Network security</p> <p>Strategic information</p> <p>Personal information</p>	<p>JGN’s relationship with the vendor could be impaired</p> <p>The ICT employed is aged and exposed to growing cyber-threats from un-patched vulnerabilities</p> <p>Customers referred to specifically should have their details kept confidential</p>	<p>JGN wishes to maintain a positive relationship with the vendor during the transition</p> <p>Revealing the nature and age of the systems currently in use could expose JGN and its customers to higher cyber-security risks from targeted threats</p> <p>Relationships with specific customers could be impaired by public revelation of disputes</p>	<p>The potential consequence of system failure has an unacceptable impact on customers and on the business</p> <p>Revealing details of the aging technologies, and JGN’s plans to deal with it, has the potential to increase the likelihood of such a failure</p> <p>JGN is not aware of any public benefit in publicly disclosing this information that could outweigh this detriment</p>

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<p>Page 9 – Option 2 – Qualitative risk - sentence relating to risk</p> <p>Page 13 – Recommendation - second sentence relating to risk</p>						
<p>IB – Industrial & Commercial (I&C)</p> <p>Several paragraphs on pages 4-6 plus the footer under the Background section and also the Description paragraph of Option 1 in the Options section.</p>	<p>Details relating to specific persons and companies</p>	<p>ICT</p>	<p>Strategic information</p>	<p>JGN’s relationship with the vendor is commercial in confidence</p>	<p>JGN has been open about the relationship with the vendor and the current level of service being provided - this could potentially impact negatively upon the relationship if these comments were made publicly available</p>	<p>JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the potential detriment to the relationship with the vendor and the ongoing management of the system</p>
<p>IB - SAP business case</p> <p>Several paragraphs throughout the document</p>	<p>The confidential information falls into three categories: Commercial/costing Cyber-security</p>	<p>ICT</p>	<p>Strategic information, Market sensitive cost inputs, Network security, Personal information</p>	<p>Revealing cost breakdowns of project elements may provide potential bidders an advantage during tendering Potential cyber-vulnerabilities should not be publicly revealed information</p>	<p>JGN – and therefore customers – could be financially disadvantaged A cyber-attack on Jemena could become more targeted</p>	<p>JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the potential detriment because:</p>

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	Revelations from customers of 3 rd party service providers			was obtained from organisations in the interests of shared learning but on the basis that confidentiality would be assured. A breach of that confidence could bring harm to that business and therefore, reduce the willingness of businesses to disclose information voluntarily	and effective using the information disclosed Other organisations in the future could be reticent to be completely open with Jemena if they do not feel that their candid feedback is entirely confidential	The best commercial outcome for JGN is in the long-term interests of customers Service reliability and public safety relies upon strong cyber-security The organisation(s) referenced have no equivalent public benefit requirement and their comments are confidential

Attachment 4.8 Augmentation capex source information

PEMs, NPV and External support letters	Capex - Augmentation	Capex - Augmentation	Market sensitive cost inputs Personal Information and others	Disclosing contractor pricing and margin information can harm JGN and the contracting party's commercial interests. External letters written to support the respective options analysis.	Public disclosure of contractor costs for particular types of materials or services could harm JGN's legitimate business interests and ultimately increase costs passed onto customers. Public disclosure could potentially harm JGN and the third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
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Aerotropolis options analysis, page 8, 28	Capex	Connections capex	Personal Information	Detailed information provided on specific developments not yet in the public domain	Public disclosure could potentially harm JGN and the third-party's commercial interests	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Attachment 4.9 Report of factual findings - Property costs						
Entire report	Report of factual findings	Property costs	Other	We have not obtained permission from KPMG to publish this report	Public disclosure of reports that our auditors have not authorised may increase the cost of audit fees in the future and ultimately increase costs passed onto customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Attachment 5.1 Opex expenditure forecast 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.
Attachment 5.3 Response to the AER's draft decision – Operating expenditure						
Section 3.1, footnote 27	Forecast wholesale 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.

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Attachment 6.3 Factual findings report - contaminated sites						
Entire report	Contaminated Sites	Contaminated Sites	Other	We have not obtained permission from KPMG to publish this report	Public disclosure of reports that our auditors have not authorised may increase the cost of audit fees in the future and ultimately increase costs passed onto customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Attachment 12.1 JGN PTRM						
Rows 568, 569, 570, 612, 616, 619, 624, 633, 634, 640, 643, 644, 645, 690, 694, 697, 702, 711, 712, 718, 721, 722, 723 in 'PTRM input 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 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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Rows 28, 32, 35, 40, 49, 50, 56, 59, 60, 61, 137, 138, 139, 183, 187, 190, 195, 204, 205, 211, 214, 215, 216 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.

Attachment 13.3 Demand forecast models (revised proposal)

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 sought from	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.
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					these customers on a confidential basis.	Additionally, the model includes private and/or confidential information relating to individual customers' demand and/or bills.

Attachment 13.5 JGN Core volumes to PTRM (Tariff D)

Whole model	Customer demand information	Demand	Other	This is confidential information related to customers' consumption and demand levels which discloses that customer's competitively sensitive information.	This is confidential information related to customers' consumption and demand levels. Publishing this information could harm legitimate business interests of these customers.	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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Attachment 14.1 Prudent discounts

Whole document	JGN's prudent discount customers, their discounts and justification.	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. Publishing this information could harm legitimate business interests of these customers.	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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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
Revised 2020 Plan	0	81	81	0%	0%
2020-25 AA and RSA	0	188	188	0%	0%
Revised 2020 Plan attachments	126	1,895	2,021	6.23%	93.77%
Total	126	2,164	2,290	0%	100.00%