



Jemena Gas Networks (NSW) Ltd

2025-30 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 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 6.11M Climate reporting model						
Worksheet 'CONFIDENTIAL calculations'	Calculations of costs required to comply with AASB climate disclosures, including consulting fees and FTE costs	Opex	Market sensitive cost inputs	Revealing the calculations could negatively impact JGN's ability to secure competitive consulting rates from the market, which are ultimately passed on to customers.	Disclosing this information could reveal the rates of consultancies and audit firms, undermining JGN's ability to negotiate competitive terms. Additionally, it could go against the business interests of third-party companies that provide services to JGN.	Higher costs and prices do not benefit customers. Additionally, disclosing the fees of third-party companies may harm their business interests. There is no public benefit in revealing the rates of consultancies.
Worksheet 'CONFIDENTIAL assumptions'	Assumptions and inputs into costs required to comply	Opex	Market sensitive cost inputs	Revealing the calculations could negatively	Disclosing this information could reveal the rates	Higher costs and prices do not benefit customers.

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	with AASB climate disclosures			impact JGN's ability to secure competitive consulting rates from the market, which are ultimately passed on to customers.	of consultancies and audit firms, undermining JGN's ability to negotiate competitive terms. Additionally, it could go against the business interests of third-party companies that provide services to JGN.	Additionally, disclosing the fees of third-party companies may harm their business interests. There is no public benefit in revealing the rates of consultancies.

Attachment 6.10M Safeguard mechanism reporting model

<p>All worksheets.</p> <p>The public version does not align with the proposed opex allowance due to the removal of confidential aspects but is submitted as per the note on the first tab, to demonstrate the methodology used to determine costs. Values on other tabs of the public version are minus confidential information.</p>	Forecast demand (GJ) for an industrial customer	Demand	Market sensitive information	Publishing the information would reveal the demand from that individual customer, causing that customer to be identified.	This is confidential information related to a single customer's forecast demand. Publishing this information could harm the	This information is private and confidential information relating to an individual customer. There is no public benefit to identifying this market sensitive information. The long term interests of
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					legitimate business interest of this customer.	consumers would not be served by revealing the information of one industrial customer.
Attachment 7.2 Ancillary Reference Services						
Page 2 and 4	Raw hourly rate for labour	Ancillary services cost build up	Market sensitive cost inputs	The raw labour rates are the most basic hourly labour rate and excludes all JGN on-costs and overheads. This information includes contractor labour rates which are derived from confidential agreements.	Underlying labour rates are commercial-in-confidence	Disclosure would result in a breach of confidentiality obligation.
Page 5	JGN proposed hourly rates	Ancillary services cost build up	Market sensitive cost inputs	The confidential information contains our raw labour rates	Underlying labour rates are	Disclosure would result in a breach of

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				for different categories including administration, field worker, and technical specialist. The figures are based on, in part, labour rates from confidential agreements	commercial-in-confidence	confidentiality obligation.
Page 11 and 12	Material costs	Ancillary services cost build up	Market sensitive cost inputs	This information contains underlying material costs which, if published, could affect JGN's (and third party service providers') ability to obtain competitive prices in future	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclose could therefore harm JGN's commercial	Publication of this information would be harmful (and may result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.

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				procurement processes.	interest and ultimately increase costs passed onto customers.	
Page 11 and 13	Contractor costs	Ancillary services cost build up	Market sensitive cost inputs	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 may result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.
Attachment 7.2M Ancillary Reference Services model						
Worksheet Input\Labour Rates	Basic labour rates	Ancillary services cost build up	Market sensitive cost inputs	Publication of this information would affect JGN's ability to obtain competitive	Publication of this information may influence tenders in the future.	JGN is not aware of any public benefit in publicly disclosing this information through could

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				prices in the future and would adversely affect our ability to negotiate fair market prices		outweigh the detriment.
Worksheet Input Units	Materials and contract costs.	Ancillary services cost build up	Market sensitive cost inputs	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.	JGN is not aware of any public benefit in publicly disclosing this information through could outweigh the detriment.
Worksheet Calc Labour Rates	Total Labour rate, basic labour rates, on costs and standard labour rate.	Ancillary services cost build up	Market sensitive cost inputs	Information needs to confidential otherwise can back calculate and/or see other	Publication of this information may influence tenders in the future.	JGN is not aware of any public benefit in publicly disclosing this information through could outweigh the detriment.

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				confidential information.		
Worksheet Calc Charges [Labour rates, material, contract costs	Ancillary services cost build up	Market sensitive cost inputs	Information needs to confidential otherwise can back calculate and/or see other confidential information.	Publication of this information may influence tenders in the future.	JGN is not aware of any public benefit in publicly disclosing this information through could outweigh the detriment.
Attachment 7.10 Averaging Period Proposal						
Section 1.1, Table 1-1, column 2, page 1 Section 1.2, paragraph 1, page 1	Return on debt and equity averaging periods for the 2025-30 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	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.

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				<p>is not available in public domain.</p> <p>Stakeholders do not require this information in order to understand and assess the substance of all issues arising in JGN's AA proposal.</p>		
Attachment 7.4 Future of gas analysis						
Section 5.5.1, Page 25-28	Revenue risks	Revenue risks	Sensitive information	The cashflow analysis contains sensitive information regarding potential scenarios arising in a future of uncertain gas demand.	It may harm JGN's ability to procure competitively priced finance and impact JGN's legitimate commercial interests.	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.

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Attachment 7.8M Future of gas model						
<p>All sheets with the exception of the 'Output Stranding risk and AD' and 'Output Cust. engagement' are confidential and in their place, the dashboard outputs of all possible scenarios have been provided in the public version of the model to enable readers to understand the model's dashboard and outputs.</p> <p>Confidentiality claims fall between the two categories of Sensitive information and Market sensitive cost inputs and strategic information.</p>	Revenue Risks	Revenue Risks	Sensitive information	The cashflow analysis contains sensitive information regarding potential scenarios arising in a future of uncertain gas demand.	It may harm JGN's ability to procure competitively priced finance and impact JGN's legitimate commercial interests.	There is no public benefit to disclosing sensitive information, and accordingly this model. The long term interests of consumers would not be served by increasing finance costs of service providers.
As above.	Cost build-up of network upgrades for renewable gases and decommissioning assets	Capital 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	Publication of this information would harm JGN's ability to negotiate competitive prices with potential suppliers of services.	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.

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				negotiate fair market prices		
Attachment 7.6.1M PTRM - Step 1						
<p>Rows 580-581, 624, 632, 635-636, 641, 646, 653-654, 660, 663-664, 709, 717, 720-721, 726, 731, 738-739, 745, 748-749 in sheet 'PTRM input'</p> <p>Rows 22, 30, 33-34, 39, 44, 51-52, 58, 61-62, 146-147, 191, 199, 202-203, 208, 213, 220-221, 227, 230-231 in sheet 'Forecast Revenues'</p>	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.
Attachment 7.6.2M PTRM - Step 2						
<p>Rows 579-580, 623, 631, 634-635, 640, 645, 652-653, 659, 662-663, 708, 716, 719-720, 725, 730, 737-738, 744, 747-748 in sheet 'PTRM input'</p> <p>Rows 21, 29, 32-33, 38, 43, 50-51, 57, 60-61, 145-146, 190, 198, 201-202, 207, 212, 219-220, 226, 229-230 in sheet 'Forecast Revenues'</p>	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	This is confidential information related to customers' bills. Publishing this information could harm legitimate	This is customer confidential information that may impact their business interests. There is no public benefit to identifying

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				enable the price, demand and revenue from individual customers to be identified	business interests of customers on these tariff categories.	this customer information.
Attachment 8.4M NSW Demand Forecast Model						
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

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					sought from these customers on a confidential basis.	model includes private and/or confidential information relating to individual customers' demand and/or bills.
Attachment 8.5M NSW EDD Index Model						
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.	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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					Information was sought from these customers on a confidential basis.	Additionally, the model includes private and/or confidential information relating to individual customers' demand and/or bills.
Attachment 8.6M Weather Normalisation Demand Model						
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	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	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

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				customer demand.	advantaged. Information was sought from these customers on a confidential basis.	process. Additionally, the model includes private and/or confidential information relating to individual customers' demand and/or bills.
JGN - Att 10.1 - Pricing - 20240628 - Confidential						
Section 6.1.1 - Standalone and avoidable costs (pages 23 and 24) For tariff classes DC-5, DMT-5, DC-8 and DC-9	Revenue for tariffs with three or fewer customers	Revenue	Market sensitive cost inputs	The tariff classes identified have three or less customers which, if published, could potentially enable the revenue from individual customers to be identified.	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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Section 6.1.5 - Prudent discounts (pages 28-29)	Revenue for tariffs with three or fewer customers	Revenue	Market sensitive cost inputs	The tariff classes identified have three or less customers which, if published, could potentially enable the revenue from individual customers to be identified.	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.
JGN - Att 10.4M - Cost of supply model (COSM) - 20240628 - Confidential						
Whole model	JGN's cost of supply model, which produces outputs required in JGN's response to the reset RIN	Demand, revenue and customer information	Market sensitive cost information and Other	The model is designed to help the AER by providing a reconciliation between information from various regulatory models and JGN's cost of	There is no benefit of making this public as it is a reconciliation tool to assist the AER in its review. The customer information included in the RIN Template is	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.

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				supply model calculations. It includes confidential customer information.	sensitive information and cannot be made public.	
JGN - Att 5.4 - Technology plan - 20240628 - Public						
Section 3.1.1 Cloud Computing and Vendor Dominance, Page 9	Information on our vendors services	Demand, revenue and customer information	Market sensitive cost information and Other	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.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
8.2 Ongoing Governance to ensure efficient vendor expenditure (pages 35, 36 and 37)	Information on our vendors services	Demand, revenue and customer information	Market sensitive cost information and Other	Publication of this information would affect JGN's ability to obtain	Publication of this information may influence tenders in the future.	JGN is not aware of any public benefit in publicly disclosing this information that

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				competitive prices in the future and would adversely affect our ability to negotiate fair market prices		could outweigh the detriment.

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
2025 Plan and attachments (including AA and RSA)	73	2,102	2,175	3.4%	96.6%
AA proposal models (excluding the RIN reconciliation models that were submitted together with the proposal models)	81	70	151	53.6%	46.4%
Total	154	2,172	2,326	6.6%	93.4%