



Jemena Gas Networks (NSW) Ltd

Revised 2025-30 Access Arrangement Proposal

Attachment 1.2

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
JGN – RP- Att 4.2 – Renewable gas expenditure						
Page ii,10, 11,12, 17, 19, 20, 21, 22, 23, 24, 25,	Renewable gas related market information	Capex	Strategic information, market intelligence and market sensitive cost inputs	This contains commercially sensitive information relating to project developers, project opportunities and JGN's strategic operations.	Disclosing this information would disrupt commercial outcomes for these projects, affect future procurement processes and impede JGN's ability to obtain future strategic and market information. In turn, this could compromise project opportunities and lead to poor outcomes and increased costs for consumers.	Consumers benefit from fair and competitive market outcomes. No material public benefit would be gained from the disclosure of this information.
JGN – RP – Att 4.4M – Metering replacement volume forecast model - 20250115						
Entire model	Meter replacement volumes by types	Capex	Market sensitive cost	Revealing volumes could disadvantage JGN in future negotiations with	The details relating to JGN's outsourcing arrangements (including structure and	While the detriment of publishing the information is clear, JGN is not aware of

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				<p>future suppliers, leading to higher prices of 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</p>	<p>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.</p>	<p>any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.</p>
JGN – RP – Att 4.5M – Metering replacement capex forecast model - 20250115						
Entire model	Meter replacement capex – Volumes and unit rate	Capex	Market sensitive cost	This information contains underlying (contractor) labour costs which, if published, could affect JGN's (and third party service providers') ability to	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. Disclosure could	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this

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				obtain competitive prices in future procurement processes.	therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	information, as opposed to using it on a confidential basis.
JGN - Frontier - RP - Att 4.7 - Renewable gas expenditure technical note						
<p>Pages 3, 4, 5, 6, 7, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 37, 38, 39, 40, 41, 43, 44, 45, 46, 47, 48, 49, 51-131</p>	Renewable gas related market information	Capex	Strategic information, market intelligence and market sensitive cost inputs	This contains commercially sensitive information relating to project developers, project opportunities and JGN's strategic operations.	Disclosing this information would disrupt commercial outcomes for these projects, affect future procurement processes and impede JGN's ability to obtain future strategic and market information. In turn, this could compromise project opportunities and lead to poor outcomes and increased costs for consumers.	Consumers benefit from fair and competitive market outcomes. No material public benefit would be gained from the disclosure of this information.
<p>JGN - Frontier - RP - Att 4.8M - Revised 10056139 Lilli Pilli CBAM – 20241220 Whole document</p>	Renewable gas related information	Capex	Strategic information, market intelligence and	This contains commercially sensitive information relating to project developers, project	Disclosing this information would disrupt commercial outcomes for these projects, affect future	Consumers benefit from fair and competitive market outcomes. No material public

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<p>JGN - Frontier - RP - Att 4.9M - Revised 13127805 Blue Gum CBAM – 20241220 Whole document</p> <p>JGN - Frontier - RP - Att 4.10M - Revised 13127877 Huon Pine CBAM – 20241220 Whole document</p> <p>JGN - Frontier - RP - Att 4.11M - Revised 13127883 Kauri CBAM – 20241220 Whole document</p> <p>JGN - Frontier - RP - Att 4.12M - Revised 13128085 Wollemi CBAM – 20241220 Whole document</p> <p>JGN - Frontier - RP - Att 4.13M - Revised 13128087 Coolabah CBAM – 20241220 Whole document</p> <p>JGN - Frontier - RP - Att 4.14M - Revised 13128093 Iron Bark CBAM – 20241220 Whole document</p>			market sensitive cost inputs	opportunities and JGN's strategic operations.	procurement processes and impede JGN's ability to obtain future strategic and market information. In turn, this could compromise project opportunities and lead to poor outcomes and increased costs for consumers.	benefit would be gained from the disclosure of this information.

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<p>JGN - Frontier - RP - Att 4.15M - Revised 13128098 Red Gum CBAM – 20241220</p> <p>Whole document</p>						
<p>JGN – Frontier – RP – Att 4.18M – Electricity counterfactual Lilli Pilli CBA model – 20250110</p> <p>Whole document</p> <p>JGN - Frontier - RP - Att 4.19M - Electricity counterfactual Blue Gum CBAM – 20250110</p> <p>Whole document</p> <p>JGN - Frontier - RP - Att 4.20M - Electricity counterfactual Huon Pine CBAM – 20250110</p> <p>Whole document</p> <p>JGN - Frontier - RP - Att 4.21M - Electricity counterfactual Kauri CBAM – 20250110</p> <p>Whole document</p> <p>JGN - Frontier - RP - Att 4.22M - Electricity counterfactual Wollemi CBAM – 20250110</p> <p>Whole document</p>	Renewable gas related information	Capex	Strategic information, market intelligence and market sensitive cost inputs	This contains commercially sensitive information relating to project developers, project opportunities and JGN's strategic operations.	Disclosing this information would disrupt commercial outcomes for these projects, affect future procurement processes and impede JGN's ability to obtain future strategic and market information. In turn, this could compromise project opportunities and lead to poor outcomes and increased costs for consumers.	Consumers benefit from fair and competitive market outcomes. No material public benefit would be gained from the disclosure of this information.

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<p>JGN - Frontier - RP - Att 4.23M - Electricity counterfactual Coolabah CBAM – 20250110 Whole document</p> <p>JGN - Frontier - RP - Att 4.24M - Electricity counterfactual Iron Bark CBAM – 20250110 Whole document</p> <p>JGN - Frontier - RP - Att 4.25M - Electricity counterfactual Red Gum CBAM – 20250110 Whole document</p>						
JGN - RP - Att 4.16M - Connections capex forecast model - 20250115						
Entire model	<p>Connections capex – Unit rates</p>	Capex	Market sensitive cost	This information contains underlying (contractor) labour costs which, if published, could affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	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. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto 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.

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JGN - RP - Att 5.1 - Operating expenditure - 20250115						
Page 16, 17, 19, 20, 24, 26	Vendor information related to Security	Vendor information	Market sensitive information and 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	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.
Page 22 (footnote), 24, 28	Information on our vendors services	Demand, revenue and customer information	Market sensitive cost information and Other	Publication of this information would affect JEN'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.
JGN – RP – Att 5.3 – Picarro – 20250115						
Table 4-5 on pages 16-17.	Market information on current and planned Picarro adoption	Opex	Strategic information, market intelligence	This contains commercially sensitive information relating to the current and planned adoption Picarro advanced	Disclosing this information would affect future procurement processes and impede JGN's ability to obtain future strategic and	Publishing this information will lead to a reluctance of suppliers and potential suppliers to supply JGN or to

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JGN – RP – Att 5.6M – Revised Picarro CBAM – 20250115						
Whole model	Supplier Pricing Picarro and UAG	Opex	Market sensitive cost inputs and strategic information	Publication of this information may affect JGN's ability to negotiate and obtain competitive prices in the future. It could also adversely impact on the business interests of third party suppliers	Exposing information on cost of the technology and associated resource requirements may affect suppliers willingness to supply this technology in the future.	Publication of this information would be harmful (and potentially result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.
JGN - CORE Energy - RP - Att 6.3M - NSW Demand Forecast Model - 20250107						
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	Core Energy operates in a competitive market, and disclosing its proprietary information would provide an advantage to its	JGN is not aware of any public benefit in publicly disclosing this information that

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				competitors. Contains easily identifiable personal and/or confidential information relating to individual customer demand.	competitors. Competitors to our individual customers that operate in competitive markets may also be advantaged. Information was sought from these customers on a confidential basis.	could outweigh the detriment.
JGN - CORE Energy - RP - Att 6.4M - NSW EDD Index Model - 20250107						
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.	Core Energy operates in a competitive market, and disclosing its proprietary information would provide an advantage to its competitors.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
JGN - CORE Energy - RP - Att 6.5M - Weather Normalised Demand Model - 20250107						
Whole model	Core Energy proprietary methodology	Core Energy demand and customer forecasts			Core Energy operates in a competitive market, and disclosing its proprietary information would provide an advantage to its competitors.	

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JGN - RP - Att 6.6M - Demand forecast mapping model - 20250115						
Whole model	JGN's demand forecast mapping model	Customer demand information	Market-sensitive cost information and Other	The model is designed to help the AER by providing a mapping between information from various regulatory models and JGN's PTRMs. It includes confidential customer information.	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 sensitive information and cannot be made public.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
JGN - RP - Att 7.2A - Illustrative 2020-25 PTRM excluding revenue handback - 20250115						
Whole model	Price and volume information	Revenue	Market sensitive information and Personal information	The tariff classes identified have three or fewer customers which 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.
JGN - RP - Att 7.4M - PTRM - Step 1 - 20250115						
Rows 580-581, 615, 617, 625, 628-29, 634, 639, 646-47, 653, 656-57, 693, 695, 703, 706-07,	Price and volume information	Revenue	Market sensitive information and	The tariff classes identified have three	This is confidential information related to	This is customer confidential

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<p>712, 717, 724-25, 734-35 in sheet 'PTRM input'</p> <p>Rows 20, 22, 30, 33-34, 39, 44, 51-52, 58, 61-62, 139-40, 175, 177, 185, 188-89, 194, 199, 206-07, 213, 216-17 in sheet 'Forecast Revenues'</p>			Personal information	or fewer customers which could potentially enable the price, demand and revenue from individual customers to be identified	customers' bills. Publishing this information could harm legitimate business interests of customers on these tariff categories.	information that may impact their business interests. There is no public benefit to identifying this customer information.
JGN - RP - Att 7.5M - PTRM - Step 2 - 20250115						
<p>Rows 579-80, 616, 624, 627-28, 633, 638, 645-46, 652, 655-56, 694, 702, 705-06, 711, 716, 723-24, 730, 733-34 in sheet 'PTRM input'</p> <p>Rows 21, 29, 32-33, 38, 43, 50-51, 57, 60-61, 138-39, 176, 184, 187-88, 193, 198, 205-06, 212, 215-16 in sheet 'Forecast Revenues'</p>	Price and volume information	Revenue	Market sensitive information and Personal information	The tariff classes identified have three or fewer customers which 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.

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 2025 Plan	0	81	81	0%	100%
Revised proposal attachments (including AA and RSA)	382	1098	1480	25.8%	74.2%
AA proposal regulatory models	4	100	104	4%	96%
Total	386	1279	1665	23.2%	76.8%