

Jemena Gas Networks (NSW) Ltd

2015-20 Access Arrangement

Response to the AER's draft decision and revised proposal

Appendix 1.6 - Confidentiality Claims

Public

27 February 2015



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1. CONFIDENTIALITY CLAIMS

1. The Australian Energy Regulator (**AER**) confidentiality guideline requires JGN to make claims for confidentiality over any JGN information in accordance with the requirements of the guideline.
2. [insert table] sets out specific sections of JGN's 2015 access arrangement revised proposal that JGN claims to be commercial-in-confidence and the basis of the claim.
3. JGN has applied the rationale for claiming information as commercial-in-confidence as set out in the AER's confidentiality guideline.
4. JGN has provided reasons detailing how and why disclosure of the information would cause detriment to the business. JGN understands that this confidential information being available to the AER to perform its functions under the rules provides a public benefit. JGN has assessed that, in all identified cases, JGN's confidentiality reasons, together with the benefits already realised through the AER's confidential use of this data, are not outweighed by any additional public benefit to disclosure of the information.
5. JGN has marked confidential information in documents by containing the information in square brackets, starting with c-i-c and highlighting in yellow where this is possible for example [c-i-c...]. It has not been possible to highlight all diagrams or elements included as pictures in documents. In these instances, JGN has made it clear in Table 1-1 that the relevant item is subject to a confidentiality claim.
6. JGN has marked confidential information in spreadsheets by formatting the cells as [c-i-c].

Table 1–1: JGN 2015-20 AA revised submission confidentiality claims

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|---|---|---|------------------------------|---|--|---|
| Access Arrangement (AA) | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Reference Services Agreement | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Access Arrangement Information (AAI) (revised) | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| JGN response to the draft decision (RDD) | | | | | | |
| Table 4-1, p. 57 | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values within the table cannot be back-solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |

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|--|---|---|------------------------------|---|---|---|
| | | | | operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. | |
| Table 4-1, p. 57 | Margins | Capex | Market sensitive cost inputs | Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Table 4-2, p. 58 | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values within the table cannot be | The details relating to JGN's outsourcing arrangements (including | While the detriment of publishing the information is clear, JGN is not aware of any |

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| | | | | <p>back-solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p> | <p>structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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>material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.</p> |
| Table 4-2, p. 58 | Margins | Capex | Market sensitive cost inputs | <p>Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice</p> | <p>The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business interests if published. Public disclosure of this information may prejudice</p> | <p>While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties</p> |

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| | | | | those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. | involved in regulatory processes. |
| Table 4-4, pp. 60-61 | Connections unit rates | Capex - unit rates | Market sensitive cost inputs | This information contains underlying internal (and 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 legitimate business interests and, ultimately, increase costs passed on to 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. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Table 4-6, p. 63 | Sensitivity testing of contractor unit rates | Capex - unit rates | Market sensitive cost inputs | This information contains underlying internal (and 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 legitimate business | 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. Confidentiality arrangements can be put in place to allow |

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| | | | | | interests and, ultimately, increase costs passed on to customers. | access to the information for the relevant interested parties involved in regulatory processes. |
| Table 4-21, pp. 83-84 | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values available in tables 4-1 and 4-2 cannot be back-solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Paragraph 387, p. 84 | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values available in tables 4-1 and 4-1 cannot be back-solved. | The details relating to JGN's outsourcing arrangements (including structure and activity | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public |

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| | | | | <p>Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p> | <p>scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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>benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.</p> |
| Table 4-22, p. 84 | Margins | Capex - Government authority work | Market sensitive cost inputs | <p>This needs to be confidential to ensure margin values available in tables 4-1 and 4-1 cannot be back-solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing</p> | <p>The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes</p> | <p>While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory</p> |

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| | | | | margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. | processes. |
| Paragraph 390, p. 84 | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values available in tables 4-1 and 4-1 cannot be back-solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |

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| Paragraphs 401 and 402 (part) and footnote 229, pp. 86-87. | SCADA | Capex | Personal information and Market sensitive cost impacts | This information has been provided by a supplier to JGN as a client. The supplier has not made the information publically available. | The supplier has advised that public disclosure would affect its competitive position. | Disclosure could adversely affect the supplier's competitive position. JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |
| Paragraph 410, p. 89 | Customer contributions | Capex | Personal information and Market sensitive cost impacts | The information relates to a third party's commercial arrangements with JGN. | Disclosure could prejudice the third party's dealings with other parties. | Disclosure could prejudice the third party's dealings with other parties. JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |
| Paragraphs 431-435, pp. 93-94 Includes footnotes 254- 256. | Details of the management fee paid to Zinfra | Management fee | Market sensitive cost inputs | Revealing the management fee could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow |

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| | | | | operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | 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. | access to the information for the relevant interested parties involved in regulatory processes. |
| Third bullet, paragraph 438, p. 94 | Details of the management fee paid to Zinfra | Management fee | Market sensitive cost inputs | Revealing the management fee could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |

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| Table 5-3, p. 99 | Wholesale gas price assumptions for unaccounted for gas (UAG) | UAG | Market sensitive cost inputs | Revealing JGN's average UAG price expectations 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 seeking to procure this gas via competitive tender. | As UAG is a pass through item, JGN customers would be worse off should JGN's tendering position deteriorate. |
| Second bullet point, paragraph 647, p. 150 | Commentary about commercial issues and potential disputes that might arise with network users and other parties should a gas supply shortfall arise. | Pass through events | Strategic information | This information contains details about potential issues relevant in any negotiations JGN undertakes with third parties about the financial impacts arising from a gas supply shortfall event. | JGN considers this information should remain confidential so as to not disadvantage JGN (and therefore its customers) in enforcing its contractual rights. | Revealing this information could compromise JGN's ability to ensure that the financial consequences of upstream issues are borne by other parties, and not by JGN (and its customers). |
| Box 13-1, p. 160 (three separate instances in Box 13-1) | National Energy Customer Framework IT costs | Capex – pass through | Market sensitive cost inputs | The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between JGN and its potential service providers. | Public disclosure of this information could undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. This is because vendors would gain an insight into how much JGN has historically paid, or forecast to pay to establish the required capability. This could set a floor in the | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory |

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| | | | | | market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. | processes. |
| JGN RDD APPENDICES | | | | | | |
| Appendix 1.1: Implications for JGN of increasing competition in the consumer energy market | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 1.2: AER engagement approach – JGN AA review | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 1.3: The draft decision – long-term customer consequences | | | | | | |
| Section 2 Entire section pp. 7 -11 | Description of potential impacts on JGN expenditure if the JGN's revenue allowance from the AER is insufficient | Capex, opex, rate of return, cost of tax, demand | Market sensitive cost inputs | The material contains detailed information about potential funding scenarios, financial and strategy information which could impact capex and opex spend in future. Publishing the material may prejudice future tender and commercial negotiation processes between JGN and | Public disclosure of this information could undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. This is because vendors would gain an insight into how much JGN is forecast to pay in specified areas of its business, together with | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |

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| | | | | its potential service providers. | information about particular projects currently being planned. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. | |
| Section 4 Entire section p. 20 | Description of potential impacts on JGN expenditure if the JGN's revenue allowance from the AER is insufficient | Capex, opex, rate of return, cost of tax, demand | Market sensitive cost inputs | The material contains detailed information about potential funding scenarios, financial and strategy information which could impact capex and opex spend in future. Publishing the material may prejudice future tender and commercial negotiation processes between JGN and its potential service providers. | Public disclosure of this information could undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. This is because vendors would gain an insight into how much JGN is forecast to pay in specified areas of its business, together with information about particular projects currently being planned. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |

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| Appendix 1.4: Response to draft decision on JGN's revised AA | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 1.5: Response to draft decision on JGN's revised RSA | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 1.6: Confidentiality claim | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 1.7: Pre-lodgement engagement material and correspondence¹ | | | | | | |
| Item 1, Letter to Andrew Reeves (AER) from Shaun Reardon (Jemena), JGN Access Arrangement – cross period pass through, p. 2, paragraph 5. | UAG pass through amounts | Financial details for UAG | Market sensitive cost inputs | Revealing JGN's UAG pass through amount 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 seeking to procure this gas via competitive tender. Note that the Licence fee figure is captured due to an ability to infer the UAG costs if both it and the total were to | As UAG is a pass through item, JGN customers would be worse off should JGN's tendering position deteriorate. |

¹ JGN has not made any claims for confidentiality on the letters that we have received from the AER (items 2,4 and 7 of appendix 1.7), on the basis that these have not been marked as confidential by the AER.

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| | | | | | be published. The totals have previously been published as part of JGN's annual tariff variation decisions. | |
| Item 3, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20 access arrangement draft decision – capex and cross-period pass through</i> Paragraph 5, p. 1. | Margins | Capex | Market sensitive cost inputs | Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Item 3, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20</i> | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values within tables 4-1 and 4-2 in the RDD cannot be back-solved. Revealing the | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER |

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| <p><i>access arrangement draft decision – capex and cross-period pass through</i> Paragraphs 2 and 3, p. 3 (3 instances)</p> | | | | <p>management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p> | <p>confidential to JGN and could harm JGN's and its related parties' legitimate business 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>publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.</p> |
| <p>Item 3, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20 access arrangement draft decision – capex and cross-period pass through</i> Paragraphs 1, 2 and 3, p. 6 (3)</p> | <p>Details of the management fee and margin paid to Zinfra</p> | <p>Management fee and margin</p> | <p>Market sensitive cost inputs</p> | <p>Revealing the management fee and margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers'</p> | <p>The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes</p> | <p>While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory</p> |

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|---|---|---|------------------------------|---|---|---|
| instances) | | | | commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. | processes. |
| Item 3, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20 access arrangement draft decision – capex and cross-period pass through</i> p. 8. (2 instances) | Details of the management fee and margin paid to Zinfra | Management fee and margin | Market sensitive cost inputs | Revealing the management fee and margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Item 3, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values within tables 4-1 and 4-2 of the RDD cannot be back- | The details relating to JGN's outsourcing arrangements (including structure and activity | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
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| <p><i>JGN 2015-20 access arrangement draft decision – capex and cross-period pass through</i> p. 9</p> | | | | <p>solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p> | <p>scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business 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>benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.</p> |
| <p>Item 5, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20 access arrangement draft decision</i>, third bullet point, p. 2</p> | <p>Details of the management fee paid to Zinfra</p> | <p>Management fee</p> | <p>Market sensitive cost inputs</p> | <p>Revealing the management fee could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice</p> | <p>The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice</p> | <p>While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties</p> |

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| | | | | those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. | involved in regulatory processes. |
| Item 5, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20 access arrangement draft decision</i> , forth bullet point, p. 2 | Details of the management fee paid to Zinfra | Management fee | Market sensitive cost inputs | Revealing the management fee could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |

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| Item 5, Letter to Sebastian Roberts (AER) from Robert McMillan (Jemena), <i>JGN 2015-20 access arrangement draft decision</i> , fifth bullet point and footnote 7, p. 2. | Details of the management fee paid to Zinfra | Management fee | Market sensitive cost inputs | Revealing the management fee could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business 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 public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Item 11, JGN presentation to AER - <i>Jemena Gas Networks</i> – on State Grid transaction, mine subsidence, government authority work, incentive | Details of the cost recovery arrangements for mine subsidence expenditure | Mine subsidence cost recovery | Strategic information and market sensitive cost inputs | Revealing details of the cost recovery arrangements for mine subsidence expenditure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Public disclosure of this information may affect | The details relating to the cost recovery arrangements for mine subsidence expenditure are commercially confidential to JGN and could harm JGN's legitimate business interests if published. Public | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in |

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| mechanisms, Slide 13 | | | | JGN's mine subsidence cost recovery negotiations if made public. Revealing this information could also potentially impact JGN's ability to successfully finalise other mine subsidence compensation arrangements in the future. | disclosure of this information may also prejudice future commercial negotiations between JGN and the Mine Subsidence Board, and possibly also commercial negotiations between JGN and other parties (e.g. mining companies) in relation to mine subsidence impacts on JGN's network assets. | place to allow access to the information for the relevant interested parties involved in regulatory processes, should that be necessary. |
| Item 12, JGN presentation to AER – <i>Our 2015 Plan</i> , p. 63 | Margins | Capex - Government authority work | Market sensitive cost inputs | This needs to be confidential to ensure margin values within disclosed in tables 4-1 and 4-2 in the RDD cannot be back-solved. Revealing the management margin could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and its related parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |

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| | | | | market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | negotiations between JGN's related parties and their unrelated customers. | |
| Item 13, JGN presentation to AER – <i>Draft decision – market expansion capex.</i> Slide 10 | Unit rates | Capex - unit rates | Market sensitive cost inputs | This information contains underlying internal (and 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 legitimate business 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. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Item 13, JGN presentation to AER – <i>Draft decision – market expansion capex.</i> Slide 21 | Unit rates | Capex - unit rates | Market sensitive cost inputs | This information contains underlying internal (and 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 legitimate business interests and, ultimately, | 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. Confidentiality arrangements can be put in place to allow access to the information for |

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|---|--|---|------------------------------|---|--|--|
| | | | | | increase costs passed onto customers. | the relevant interested parties involved in regulatory processes. |
| Item 14, JGN presentation to AER – <i>AER Briefing - JGN capital program</i> , Slides 7-8 | Unit rates | Capex - unit rates | Market sensitive cost inputs | This information contains underlying internal (and 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 legitimate business 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. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Item 14, JGN presentation to AER – <i>AER Briefing - JGN capital program</i> , Slide 11 | Details of the management fee paid to Zinfra | Management fee | Market sensitive cost inputs | Revealing the management fee could set a floor in the market when procuring such services in the future. Disclosure could harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers. Also revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial | The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes | While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
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| | | | | negotiations with other clients (who would likely demand terms no worse than those provided to JGN). | between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. | processes. |
| Item 20, Letter to Grant Rodgers (Orica Australia) from Frazer Hill (Jemena) , <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Orica submission</i> p. 1, paragraph 3-5 p. 2, Table 1 & Table 2 and paragraph 1 & 2 | Orica indicative bill and tariff levels | Orica submission | Personal information, Market sensitive cost impacts | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. |
| Item 20, Letter to Grant Rodgers (Orica Australia) from Frazer Hill (Jemena) , <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Orica</i> | Orica indicative bill impact | Orica submission | Personal information, Market sensitive cost impacts | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. |

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| <i>submission</i> p. 3, paragraph 2 | | | | | | |
| Item 21, Letter to Garbis Simonian (Weston Aluminium) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Orica submission</i> Whole document | JGN response to customer submissions on JGN initial AA proposal | Weston Aluminium submission | Personal information, Market sensitive cost impacts | The communication is a private customer correspondence and was sent on a confidential basis. The document refers to personal information relating to individual customer demand. | The customer has not given its consent to the document being made public. Competitors to our customer that operate in competitive markets may be advantaged by such disclosure. | JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |
| Item 22, Letter to Stephen Bell (Qenos) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Qenos submission</i> , p. 1, paragraph 3-5 p. 2, Table 1 & Table 2 and paragraph 1 & 2 | JGN response to customer submissions on JGN initial AA proposal | Qenos indicative bill impact | Personal information , Market sensitive cost impacts | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
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| Item 23, Letter to Greg Everett (Delta Electricity) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Delta Electricity submission</i> , p. 1, paragraph 3-5 p. 2, Table 1 & Table 2 and paragraph 1 & 2 | JGN response to customer submissions on JGN initial AA proposal | Delta indicative bill impact | Personal information, Market sensitive cost impacts | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. | This is private information relating to an individual customer's bills and tariffs. |
| Item 24, Letter to Nicole Wallis (AGL Energy Limited) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – AGL submission</i> Whole document | JGN response to customer submissions on JGN initial AA proposal | AGL Energy Ltd submission | Other | These aspects of the correspondence constitutes JGN's private response to discrete issues raised by the specific retailer. | Competitors to the retailer that operate in competitive markets may be advantaged if the document is made public. | JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |
| Item 25, Letter to Aneta Graham | JGN response to customer | Lumo Energy Ltd submission | Other | These aspects of the correspondence constitutes | Competitors to the retailer that operate in competitive | JGN is not aware of any material incremental public |

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| (Lumo Energy) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Lumo Energy submission</i> Whole document | submissions on JGN initial AA proposal | | | JGN's private response to discrete issues raised by the specific retailer. | markets may be advantaged if the document is made public. | benefit from the AER publishing this information, as opposed to using it on a confidential basis. |
| Item 26, Letter to Sallie Proctor (Energy Australia) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement Proposal – Energy Australia submission</i> Whole document | JGN response to customer submissions on JGN initial AA proposal | Energy Australia Ltd submission | Other | These aspects of the correspondence constitutes JGN's private response to discrete issues raised by the specific retailer. | Competitors to the retailer that operate in competitive markets may be advantaged if the document is made public. | JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |
| Item 27, Letter to Keith Robertson (Origin Energy) from Frazer Hill (Jemena), <i>Jemena Gas Networks 02015-20 Access Arrangement</i> | JGN response to customer submissions on JGN initial AA proposal | Origin Energy Ltd submission | Other | These aspects of the correspondence constitutes JGN's private response to discrete issues raised by the specific retailer. | Competitors to the retailer that operate in competitive markets may be advantaged if the document is made public. | JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
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| <i>Proposal – Origin Energy submission</i> Whole document | | | | | | |
| Appendix 3.1: Demand forecasting report – response to draft decision | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 3.2: Core Energy model – revised JGN demand and customer forecast | | | | | | |
| Att. 1_JGN-EDD-Index-Model_REVISIED_AER Att. 2_JGN Weather Normalisation Model_REVISIED_AER Att. 3_JGN Demand Forecast Model_FY2014_FIN AL_AER Att. 4_JGN statistics work book_FY2014_REVISIED_AER Entire spreadsheets | Core Energy proprietary methodology | Core Energy demand and customer forecasts | Market intelligence and personal information | Model contains proprietary information that if disclosed would provide an advantage to Core Energy's competitors. Contains easily identifiable personal information relating to individual customer demand. | Core Energy operates in a competitive market, and disclosing their proprietary information would provide an advantage to Core's 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. | 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 information relating to individual customers' demand and/or bills. |

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| Appendix 3.3: Demand forecasts adapted for reference tariffs – model | | | | | | |
| Whole Spreadsheet and Letter from Core Energy | JGN proprietary methodology relating to how the JGN demand and customer forecasts have been applied to forecast the chargeable quantities of each tariff class, and personal information about individual customers demand | Demand and customer forecasts | Other and Personal information | The model is proprietary information that if disclosed would disadvantage JGN's customers. It contains easily identifiable personal information relating to individual customer demand. | JGN's ability to obtain competitive prices in future from JGN's non-regulated customers would deteriorate. Competitors to our individual customers that operate in competitive markets may be advantaged. Information was sought from these customers on a confidential basis. | This is private information relating to individual customers' demand and/or bills. JGN's customers would also be detrimentally impacted if JGN's ability to negotiate price and coverage terms with non-regulated customers deteriorates. |
| Appendix 3.4: Frontier Economics review of AER demand forecasts | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 3.5: HoustonKemp review of AER demand forecasts | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 3.6: Energy savings scheme information paper | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
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| Appendix 4.1: Forecast capital model – updated | | | | | | |
| Whole model | JGN's capex forecast model | Capex forecast methodology | Market intelligence and market sensitive cost inputs | <p>The model and methodology is proprietary information that if disclosed would diminish the intellectual property JGN has invested in building the model.</p> <p>The model also contains unit rates and detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between JGN and its potential service providers.</p> <p>The project totals could also be used in combination with a public version of the RIN response to determine margins.</p> | <p>The model and methodology is proprietary information that if disclosed would diminish the intellectual property JGN has invested in building the model.</p> <p>Public disclosure of the relevant capex information could undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. This is because vendors would gain an insight into how much JGN has historically paid, or forecast to pay to establish the required capability. This could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers.</p> | <p>While not all capex information in the model is confidential, JGN provides detailed capex information in its AAI and via its public RIN response. JGN does not consider there would be any additional public benefit to disclosure of the information via the capex forecast model.</p> <p>JGN (and therefore its customers) should not be funding or producing intellectual property that would benefit those other than JGN and its customers. Disclosure would reduce JGN's incentive to produce intellectual property and innovate in ways that might enhance the long term interests of consumers.</p> |

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| Appendix 4.2: Market expansion unit rate derivation model | | | | | | |
| Whole model | Market expansion unit rate derivation model | Capex - unit rates | Market Intelligence and Market sensitive cost inputs | <p>The model and methodology is proprietary information that if disclosed would diminish the intellectual property JGN has invested in building the model.</p> <p>This model also contains unit rates (including underlying internal (and contractor) labour costs) and detailed capex program financial or strategy information (or information to enable these to be derived). This could affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes if published.</p> | 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 legitimate business interests and, ultimately, increase costs passed on to 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. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Appendix 4.3: Network projects – response to the draft decision | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 4.4: Engineering assessment and consultant report – in-line inspection of the Wilton to Horsley Park trunk pipeline | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
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| Appendix 4.5: Letter from AEMO – Gloucester supply | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 4.6: Letter from AGL – Gloucester supply | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 4.7: Letter from Ausmeter – metretek | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 4.8: Letter from Epitomy – meter data loggers | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 4.9: Letter from GE Management | | | | | | |
| Whole letter | SCADA | Capex | Personal information and Market sensitive cost impacts | This information has been provided by a supplier to JGN as a client. The supplier has not made the information publically available. | The supplier has advised that public disclosure would affect its competitive position. | Disclosure could adversely affect the supplier's competitive position. JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. |

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| Appendix 4.10: JGN overheads | | | | | | |
| Attachment A Jemena Cost Allocation Methodology Entire attachment | Details of organisational and cost centre structure Description of methodology used to attribute and allocate costs of Jemena to JGN and other assets | Cost Allocation Methodology | Market sensitive cost inputs and market intelligence | The document contains detailed listing of cost centre structure and function, cost allocation and attribution principles and detailed methodology applying to the Jemena Group where JGN is only one of many assets owned. It also details the organisational cost structure across both regulated and unregulated / competitive businesses. | The document contains details of cost allocation and attribution across a portfolio of assets and functions that are not limited to the JGN regulated gas distribution network business. It describes the methodology employed across both regulated and non-regulated businesses. This provides an opportunity for competitors in the unregulated business of Jemena to obtain advantage by providing information to the market that is otherwise not publicly available. The document contains information pertaining to cost categories, cost allocation and attribution that might adversely impact the ability of the business to obtain competitive prices in future | Jemena's businesses including JGN benefit from economies of scale resulting in competitive advantage to the group and lower costs to customers. Compromising competitive processes may lead to higher input costs and higher cost of service to customers. |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|--|---|---|--------------------------|---|--|---|
| | | | | | <p>transactions such as tender processes.</p> <p>The information may compromise the competitive standing for future service offerings such as in the asset management and works delivery segments for external customers.</p> <p>Detailed cost-centre information contained in the document may provide competitors insight into the operations and structure of the organisation that could compromise competitive standing in non-regulated market segments in which the Jemena business operates.</p> | |
| Appendix 5.1: Updated cost escalators for JGN | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 5.2: Updated productivity assessment for JGN | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |

1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|--|--|---|------------------------------|--|--|--|
| Appendix 5.3: Debt raising costs – response to the draft decision | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 5.4: Operating expenditure step changes report | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 5.5: Forecast opex model – updated | | | | | | |
| ‘Calc Opex Forecast’ sheet cells N107:S107, N115:S115 ‘Input Opex (view 1)’ sheet, cells M234:S234 ‘Input Opex (view 2)’ sheet, cells M238:S238. | Wholesale gas price for unaccounted for gas (UAG) | UAG | Market sensitive cost inputs | Revealing JGN’s average 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 seeking to procure this gas via competitive tender. | As UAG is a pass through item, JGN customers would be worse off should JGN’s tendering position deteriorate. |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|---|--|---|------------------------------|---|--|--|
| <p>'Input Opex (view 1)' sheet Cells: C50:C68, J50:M68, C74:C92, J74:M92</p> <p>'Calc Opex Summary (view 1)' sheet Cells: C53:C71, M53:S71, C77:C95, M77:S95, C:162:C180, M162:S180, C186:C204, M186:S204</p> | Enterprise Support Function values by category | Opex – administration and overheads | Market sensitive cost inputs | Information relates to JGN's administration and overhead costs by category. | The quantum expenditure and associated allocations can be used to calculate the apportionment of overheads to different service groups. Expenditure overheads allocated to service groups is commercially confidential as it could jeopardise JGN or Jemena Ltd's commercial position in future negotiations with prospective service providers. | Jemena's customers would be disadvantaged by facing higher long term costs were Jemena's negotiating position with prospective service providers deteriorates. |
| Appendix 6.1: Legal advice on WACC clawback | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.1: Return on equity | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.2: SFG - Beta and the Black CAPM | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |

1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|---|---|---|--------------------------|---|--|---|
| Appendix 7.3: SFG -Dividend discount model | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.4: SFG - Fama-French model | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.5: SFG - Required return on equity | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.6: Further update on the required return on equity for the benchmark efficient entity - Incenta | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.7: Historical estimates of the Market Risk Premium - NERA | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.8: Empirical performance of the Sharpe-Lintner and Black CAPMs - NERA | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.9: Grant Samuel letter on the AER draft decision | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|---|---|---|------------------------------|---|--|---|
| Appendix 7.10: Return on debt | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.11: Future averaging periods | | | | | | |
| Paragraph 5, p. 1. (eight highlighted items) | JGN's proposed averaging periods for the cost of debt for the second year to fifth year of the next AA period, <i>if these are required for the AER final decision.</i> | WACC - Nominated averaging period | Market sensitive cost inputs | SGSPAA (on JGN's behalf) intends to use the averaging period to either issue debt or enter hedging transactions so that it can align its actual and allowed cost of debt. Release of this information before the averaging period has passed could affect market behaviour. | Any adverse change in market behaviour could cause JGN's actual cost of debt to be worse than it would be if that information were not in the public domain. | There is no material benefit to customers from knowing this period in advance, but the detriment to JGN (and therefore its customers) could be significant. |
| Appendix 7.12: Return on debt expert report | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.13: New issue premium | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 7.14: Transition to the trailing average cost of debt | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |

1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|---|---|---|--------------------------|---|--|---|
| Appendix 7.15: JGN rate of return forecast model | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 8.1: Gamma – response to the draft decision | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 8.2: Estimating gamma for regulatory purposes - SFG | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 10.1: JGN forecast revenue model | | | | | | |
| Inputs Pricing' sheet Cells: H69:AK69, H81:AK81, H105:V109, H111:V115 H123:Q127 and H129:Q129 'Calc Smoothed Revenue' sheet Cells: H113:AK113, H125:AK125, H149:V153, H155:V159, H167:Q171, H173:Q173, | Demand | Demand | Personal information | Contains easily identifiable personal information relating to individual customer demand (or enables this to be derived). | This is private information relating to individual customers' demand and/or bills. | This is private information relating to individual customers' demand and/or bills. |

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|---|--|---|--------------------------|--|--|--|
| H385:AK385, H397:AK397, H421:V425, H427:V431, H439:Q443 and H445:Q445 | | | | | | |
| Inputs Costs' sheet Cells: N265:R266 'Calc X factor' sheet Cells: N37:R38 and N48:R49 Outputs Revenue' sheet Cells: N34:R35, N44:R44, N46:R46 | Forecast negotiated revenues | Revenues | Personal information | Contains easily identifiable personal information relating to individual customer demand and bills. | This is private information relating to individual customers' demand and/or bills. | This is private information relating to individual customers' demand and/or bills. |
| Appendix 10.2: JGN reference tariffs and customer outcomes | | | | | | |
| No confidential information | N/A | N/A | N/A | N/A | N/A | N/A |
| Supporting documentation | | | | | | |
| WACC documentation Please see Attachment A for a list of WACC documents provided with the | Documents referenced by JGN and provided to the AER to assist its assessment | WACC | Other | JGN does not own the copyright in the work and to publish the information would require JGN to obtain the permission and be licensed by the copyright owner. This would likely | JGN does not own the copyright and to publish the information would place JGN in breach of the Copyright Act 1968. | JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. |

1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document | Description of the confidential information | Topic the confidential information relates to | Confidentiality category | Why the confidential information falls into the selected category | How and why detriment would be caused from disclosing the confidential information | Reasons supporting why the identified detriment is not outweighed by the public benefit |
|--|--|---|--------------------------|--|--|---|
| revised proposal | | | | involve a lengthy commercial negotiation and the payment of a significant licence fee. | | |
| JGN 2014 annual RIN response | Claims for confidentiality are as provided with the JGN 2014 annual RIN response in 'Attachment 1 to the cover letter, confidentiality claims' submitted to the AER on 14 November 2014, which is part of the supporting documentation | | | | | |

2. PROPORTION OF CONFIDENTIAL INFORMATION

7. Section 3.3 of the AER’s confidentiality guideline requires NSPs must complete the proportion of confidential material notice as part of the manner in which they must make confidentiality claims. JGN must specify the number of pages in their submissions which contain a confidential claim and the number of pages which do not. Table 2-1 contains the required information for JGN’s revised 2015-20 Access Arrangement proposal.
8. For the purposes of this calculation, JGN has made the assumption that one sheet in an excel template equals one page. JGN has also provided totals excluding supporting documentation to the AAI and AAI appendices. Supporting documentation is often subject to copyright and the relevant page count is provided at the bottom of Table 2-1.

Table 2–1: JGN 2015-20 AA proposal—Proportion of confidential information

| 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 |
|--|--|---|-------------------------------------|--|---|
| Total AA, RSA, AAI (revised) and RDD (excluding appendices) | 15 | 413 | 428 | 4% | 96% |
| Total AA, RSA, AAI (revised) and RDD(including appendices) | 432 | 2512 | 2944 | 15% | 85% |
| Total AA, RSA, AAI (revised) and RDD (including appendices and supporting documentation) | 741 | 4694 | 5434 | 14% | 86% |
| By document | | | | | |
| AA | 0 | 91 | 91 | 0% | 100% |
| RSA | 0 | 121 | 121 | 0% | 100% |

2 — PROPORTION OF CONFIDENTIAL INFORMATION

| 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 |
|-----------------------|--|---|-------------------------------------|--|---|
| AAI (revised) | 0 | 43 | 43 | 0% | 100% |
| RDD | 15 | 145 | 159 | 9% | 91% |
| RDD appendices | | | | | |
| 1.1 | 0 | 56 | 56 | 0% | 100% |
| 1.2 | 0 | 77 | 77 | 0% | 100% |
| 1.3 | 0 | 22 | 22 | 0% | 100% |
| 1.4 | 0 | 28 | 28 | 0% | 100% |
| 1.5 | 0 | 43 | 43 | 0% | 100% |
| 1.6 | 0 | 51 | 51 | 0% | 100% |
| 1.7 | 221 | 302 | 523 | 42% | 58% |
| 3.1 | 0 | 54 | 54 | 0% | 100% |
| 3.2 | 49 sheets | 13 sheets | 62 sheets | 79% | 21% |
| 3.3 | 8 | 0 | 8 | 100% | 0% |
| 3.4 | 0 | 90 | 90 | 0% | 100% |
| 3.5 | 0 | 52 | 52 | 0% | 100% |
| 3.6 | 0 | 4 | 4 | 0% | 100% |
| 4.1 | 16 sheets | 0 sheets | 16 sheets | 100% | 0% |
| 4.2 | 22 sheets | 0 sheets | 22 sheets | 100% | 0% |
| 4.3 | 0 | 36 | 36 | 0% | 100% |

| 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 |
|------------------|--|---|-------------------------------------|--|---|
| 4.4 | 0 | 4 | 4 | 0% | 100% |
| 4.5 | 0 | 3 | 3 | 0% | 100% |
| 4.6 | 0 | 4 | 4 | 0% | 100% |
| 4.7 | 0 | 8 | 8 | 0% | 100% |
| 4.8 | 0 | 8 | 8 | 0% | 100% |
| 4.9 | 3 | 0 | 3 | 100% | 0% |
| 4.10 | 88 | 18 | 106 | 83% | 17% |
| 5.1 | 0 | 88 | 88 | 0% | 100% |
| 5.2 | 0 | 87 | 87 | 0% | 100% |
| 5.3 | 0 | 27 | 24 | 0% | 100% |
| 5.4 | 0 | 18 | 18 | 0% | 100% |
| 5.5 | 4 sheets | 9 sheets | 13 sheets | 31% | 69% |
| 6.1 | 0 | 8 | 8 | 0% | 100% |
| 7.1 | 0 | 44 | 44 | 0% | 100% |
| 7.2 | 0 | 70 | 70 | 0% | 100% |
| 7.3 | 0 | 68 | 68 | 0% | 100% |
| 7.4 | 0 | 60 | 60 | 0% | 100% |
| 7.5 | 0 | 65 | 65 | 0% | 100% |
| 7.6 | 0 | 72 | 72 | 0% | 100% |

2 — PROPORTION OF CONFIDENTIAL INFORMATION

| 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 |
|--------------------------|--|---|-------------------------------------|--|---|
| 7.7 | 0 | 76 | 76 | 0% | 100% |
| 7.8 | 0 | 88 | 88 | 0% | 100% |
| 7.9 | 0 | 13 | 13 | 0% | 100% |
| 7.10 | 0 | 51 | 51 | 0% | 100% |
| 7.11 | 1 | 2 | 3 | 33% | 67% |
| 7.12 | 0 | 114 | 114 | 0% | 100% |
| 7.13 | 0 | 82 | 82 | 0% | 100% |
| 7.14 | 0 | 57 | 57 | 0% | 100% |
| 7.15 | 0 | 8 | 8 | 0% | 100% |
| 8.1 | 0 | 25 | 25 | 0% | 100% |
| 8.2 | 0 | 74 | 74 | 0% | 100% |
| 10.1 | 5 sheets | 10 sheets | 15 sheets | 33% | 67% |
| 10.2 | 0 sheets | 10 sheets | 10 sheets | 0% | 100% |
| Supporting documentation | 309 | 2182 | 2491 | 12% | 88% |

(1) This is an approximate indication of the proportion of material in JGN's 2015-20 Access Arrangement proposal that are subject to a claim of confidentiality compared to that which are not. A page is included in the confidential count whether it has one word, or the entire page, subject to a confidentiality claim.

(2) Excel models have been calculated as one sheet is equivalent to one page.

Attachment A
List of confidential WACC supporting
documentation

Page intentionally blank

A1. LIST OF CONFIDENTIAL WACC SUPPORTING DOCUMENTATION

Table A1-1: Confidential WACC supporting documentation

| Author | Title | Date |
|--|--|-----------|
| Blume, M. E. | On the assessment of risk, <i>Journal of Finance</i> , 26, 1, 1–10 | 1971 |
| Crotty, J. | Structural causes of the global financial crisis: a critical assessment of the 'new financial architecture', <i>Cambridge Journal of Economics</i> , 33 (4), 563-580 | 2009 |
| Diebold and Li | Forecasting the term structure of government bond yields, <i>Journal of Econometrics</i> , Volume 130, pp. 337-364 | 2006, Feb |
| Fama, E. | Stock returns, real activity, inflation, and money, <i>American Economic Review</i> , 71, 545–565 | 1981 |
| Fama, Eugene F. and French Kenneth | The cross-section of expected stock returns, <i>Journal of Finance</i> 47, 427–466 | 1992 |
| Fama, E., and G. Schwert | Asset returns and inflation, <i>Journal of Financial Economics</i> , 5, 115–146 | 1977 |
| Lewellen, J., S. Nagel and J. Shanken | A Sceptical Appraisal of Asset Pricing Tests, <i>Journal of Financial Economics</i> , 96, 175–194 | 2010 |
| Michou, M., S. Mouselli and A. Stark | On the differences in measuring SMB and HML in the UK - Do they matter? <i>British Accounting Review</i> , Volume 30, pp. 1-14 | 2014 |
| Miles, D., and A. Timmermann | Variation in expected stock returns: evidence on the pricing of equities from a cross-section of UK companies, <i>Economica</i> , 63, 369–382 | 1996 |
| Nelson and Siegel | Parsimonious modelling of yield curves, <i>The Journal of Business</i> , Volume 60, Issue 4 | 1987, Oct |
| Petkova, R., and L. Zhang | Is value riskier than growth? <i>Journal of Financial Economics</i> , 78, 187–202 | 2005 |
| Rosenberg, B. | The capital asset pricing model and the market model, <i>Journal of Portfolio Management</i> , 7, 2, 5–16 | 1981 |
| Siegel, D., M. Wright and I. Filatotchev | Private Equity, LBOs, and Corporate Governance: International Evidence, <i>Corporate Governance: An International Review</i> , 19(3), 185-194 | 2011 |
| Solnik, B. | An Equilibrium Model of the International Capital Market, <i>Journal of Economic Theory</i> , 8, 500-524 | 1974 |