



# Jemena Electricity Networks (Vic) Ltd

## 2021-26 Electricity Distribution Price Review Regulatory Proposal

Attachment 01-01

Claims for confidentiality



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## Overview

The Australian Energy Regulator (**AER**) served Jemena Electricity Network (Vic) Ltd (**JEN**) a final Electricity distribution price review regulatory information notice (**EDPR RIN**) on 4 October 2019. Clause 34 of the RIN requires JEN to make claims for confidentiality over any JEN information in accordance with the requirements of the AER's confidentiality guideline.

Section 1 below, sets out specific sections of JEN's regulatory proposal—covering the 1 July 2021 to 30 June 2026 regulatory control period—that JEN claims to be confidential and the basis of the claim. JEN has applied the rationale for claiming information as confidential as set out in the AER's confidentiality guideline.<sup>1</sup>

JEN has provided reasons detailing how and why disclosure of the information would cause detriment to the business or to our customers. JEN understands that this confidential information being available to the AER to perform its functions under the rules provides a public benefit. JEN has assessed that, in all identified cases, JEN'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.

JEN has marked confidential information in documents by highlighting the content in yellow text [REDACTED]. It has not been possible to highlight all diagrams or elements included as pictures in documents. In these instances, JEN has made it clear in section 1 that the relevant item is subject to a confidentiality claim.

JEN has marked confidential information in spreadsheets by formatting the cells as [C-i-C] or [REDACTED].

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<sup>1</sup> AER, *Better Regulation, Confidentiality Guideline*, August 2017.

## 1. EDPR proposal confidentiality claims

Title page and paragraph number of the 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	Why the identified detriment is not outweighed by the public benefit
<b>JEN – Att 05-01 Forecast capital expenditure report – 20200131</b> Pages 61 and 70	Third-party forecasts of construction activity in Victoria	Capital expenditure	Other	Reveals proprietary information of third party who developed the forecasts	Disclosure of this information would commercially disadvantage the value of the third party's proprietary information and would be inconsistent with JEN's obligations with respect to the terms of use governing that information	JEN is not aware of any material public benefit in disclosing this information that could outweigh the potential detriment
<b>JEN – WSP Att 05-06 REFCL solution report – 20200131</b> Page A-4	Equipment unit rates sourced from JEN and another DNSP	Capital expenditure	Market sensitive cost inputs	Revealing the unit rates may prejudice future tender and commercial negotiation processes with potential service providers	Disclosure of this information may harm JEN's ability to procure competitively priced services in the future and impact the legitimate commercial interests of JEN and the other relevant DNSP	JEN is not aware of any material public benefit in publicly disclosing information. Customers benefit from JEN procuring cost efficient inputs to the delivery of network services
<b>JEN – Att 06-05 Operating expenditure step changes – 20200224</b> Pages 17-18	Averaging periods and debt transition costs	Operating expenditure	Market sensitive cost inputs	Reveals commercially sensitive information about SGSPAA's debt hedging window and third-party quoted debt transition costs. Release of the relevant period before the averaging period has passed could affect market behaviour.	Any adverse change in market behaviour could cause JEN's actual cost of debt to be worse than it would be if that information were not in the public domain. In addition, disclosure of costs may impact JEN's ability to procure competitively priced debt in the future and its legitimate commercial interests	JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices
Pages 22-26	Cybersecurity arrangements	Operating expenditure	Information affecting the security of the network	Reveals information about JEN's cybersecurity vulnerabilities and plans for improvement	Information could be used by external parties to gain an understanding of JEN's cybersecurity capabilities and vulnerabilities that could then be exploited. Disclosure of information may lead to cyber attacks	JEN is not aware of any material public benefit in disclosing information relating to JEN's approach to maintaining the security of the network

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Page 28	Auditor costs	Operating expenditure	Market sensitive cost inputs	Reveals commercially sensitive information about the auditor's charges	Disclosure of this information may impact JEN's ability to procure competitively priced services in the future impacting the legitimate commercial interests of JEN	JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices
<b>JEN – AON Att 06-06 Insurance premium forecast report – 20200131</b> Whole report	Details of JEN's insurance arrangements	Operating expenditure	Market sensitive cost inputs	Reveals details of our insurance costs and strategic approach for procuring insurance	Disclosure of this information may harm JEN's ability to procure competitively priced insurance in the future and impact the legitimate commercial interests of JEN and its related parties	JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices
<b>JEN – Att 07-03 Averaging periods – 20200131</b> Page 5, Table 1-1 Page 6. Para 1.3 (in part only)	Averaging periods	Rate of return	Market sensitive cost inputs	Reveals commercially sensitive information about SGSPAA's refinancing and hedging window. Release of this information before the averaging period has passed could affect market behaviour	Any adverse change in market behaviour could cause JEN's actual cost of debt to be worse than it would be if that information were not in the public domain	JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices
<b>JEN – Att 07-08 Managing risk and uncertainty – 20200131</b> Sections 3.2 and 3.3 (in part only, and including Fig 3 and fn 13)	Details of JEN's insurance arrangements	Cost pass through events	Market sensitive cost inputs and strategic information	Reveals details of our insurance costs and strategic approach for procuring insurance	Disclosure of this information may harm JEN's ability to procure competitively priced insurance in the future and impact the legitimate commercial interests of JEN and its related parties	JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices
<b>JEN – Att 07-29 ACS Metering exit fees model – 20200131</b> 'Input\Costs' tab Cells N63:T64, N70:T71, I93 and K96	Unit rates based on supplier contracted values Associated volumes have also	Capital expenditure and operating expenditure	Market sensitive cost inputs	Revealing unit rates may prejudice future tender and commercial negotiation processes between JEN and its service providers	Disclosure of this information may harm JEN's ability to procure competitively priced services in the future and impact the legitimate commercial interests of JEN	JEN is not aware of any material public benefit in publicly disclosing information. Customers benefit from JEN procuring cost efficient inputs to the delivery of network services

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'Calc Infil and execution costs' tab Cells I37, N37:T37, K39 and N39:T39.	been claimed as confidential to avoid the unit rate being inferred					
<b>JEN – Att 07-31 ACS Fee based services model – 20200127</b> Tab 'Input Time' cells K25:K27, M25:N27, K41:K43 & M41:N43 Tab 'Calc Base year cost' cells L33:M35 & L49:M51 Tab 'A1 NC 1Ph BH' cells I86:J96 Tab 'A2 NC 1Ph AH' cells I86:J96 Tab 'A3 NC 3Ph BH' cells I86:J93 Tab 'A4 NC 3Ph AH' cells I86:J93 Tab 'A5 Temp 1Ph BH' cells I86:J96 Tab 'A6 Temp 1Ph AH' cells I86:J96 Tab 'A7 Temp 3Ph BH' cells I86:J93 Tab 'A8 Temp 3Ph AH' cells I86:J93 Tab 'A9 Supply upgrade BH' cells I86:J93 Tab 'A10 Supply upgrade AH' cells I86:J93 Tab 'A11 OH SL repl. BH' cells I86:J95 Tab 'A12 OH SL repl. AH' cells I86:J95 Tab 'A13 Field Re-en BH' cells D22:J25, D43:J43, J58, J61 & J131:J132.	Unit rates and costs of suppliers e.g. contractor costs, material costs, etc	Capital expenditure and operating expenditure	Market sensitive cost inputs	Revealing unit rates may prejudice future tender and commercial negotiation processes between JEN and its service providers	Disclosure of this information may harm JEN's ability to procure competitively priced services in the future and impact the legitimate commercial interests of JEN	JEN is not aware of any material public benefit in publicly disclosing information. Customers benefit from JEN procuring cost efficient inputs to the delivery of network services

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<p>Tab 'A14 Field Re-en AH' cells D22:J25, D43:J43, J58, J61 &amp; J131:J132..</p> <p>Tab 'A15 Field De-en BH' cells D22:J27, D43:J43, J58, J61 &amp; J131:J132.</p> <p>Tab 'A29 Meter read – field' cells D22:J25, D43:J43, I50:J50, J61 &amp; J131:J132.</p> <p>Tab 'A30 Meter test BH' cells D22:J27, D43:J43, I50:J50, J61 &amp; J131:J132.</p> <p>Tab 'A31 Meter test AH' cells D22:J27, D43:J43, I50:J50, J61 &amp; J131:J132.</p> <p>Tab 'A32 type 7 metering' cells M23:M24.</p> <p>Tab 'A37 OH 3Ph SL repl. BH' cells I86:J91.</p> <p>Tab 'A38 OH 3Ph SL repl. AH' cells I86:J91</p>						
<p><b>JEN – Att 07-34 ACS Metering Capex Forecast Model – 20200131</b></p> <p>'Input\Meter Activity' tab Cells N252:U252</p> <p>'Input\Meter Inventory' tab Cells N59:U65 and N78:U83</p> <p>'Input\Comms Volumes' tab N23:U27</p>	<p>Unit rates based on supplier contracted values. Associated volumes have also been claimed as confidential to avoid the unit rate being inferred</p>	<p>Capital expenditure</p>	<p>Market sensitive cost inputs</p>	<p>Revealing unit rates may prejudice future tender and commercial negotiation processes between JEN and its service providers</p>	<p>Disclosure of this information may harm JEN's ability to procure competitively priced services in the future and impact the legitimate commercial interests of JEN</p>	<p>JEN is not aware of any material public benefit in publicly disclosing information. Customers benefit from JEN procuring cost efficient inputs to the delivery of network services</p>

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<p>'Input Unit Rates' tab Cells N14:U19, N32:U34, N44:U46, N52:U52, N68:U73, N86:U88, N98:U100, N116:U118 and N133:U135.</p> <p>'Calc Capex Meter Purchase' tab Cells N24:U29, N43:U48, N82:U82 and N90:U90.</p> <p>'Calc Capex Tech Comms' tab Cells N46:U48, N54:U56, N81:U82, N91:U92, N101:U102, N136:U138, N144:U146, N171:U172, N181:U182 and N191:U192.</p> <p>'Output Exit Fee Model' tab Cells O16:U17 and O21:U22.</p>						
<p><b>Attachment 08-03 Long run marginal cost model</b> 'Demand Inputs' tab Cells E76:O82</p>	Maximum demand by tariff	Demand	Market sensitive information and personal information	The tariffs identified have three or less customers which if published could potentially enable the demand and revenue with respect to individual customers to be identified	This confidential information relates 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 those customer's business interests. There is no public benefit to identifying this customer information



## 2. Proportion of confidential information

Section 3.3 of the AER’s confidentiality guideline requires NSPs to complete the proportion of confidential material notice as part of the manner in which they must make confidentiality claims. JEN 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 our regulatory proposal covering the next regulatory period.

For the purposes of this calculation, JEN has made the assumption that one sheet in an excel template equals one page. JEN has also provided totals excluding supporting documentation and appendices. The relevant page count is provided at the bottom of Table 2-1.

**Table 2–1: 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
Jemena Electricity Networks 2021-26 Regulatory Proposal – Overview	0	102	102	0%	100%
Jemena Electricity Networks 2021-26 Regulatory Proposal – Short on Time	0	14	14	0%	100%
Jemena Electricity Networks 2021-26 Regulatory Proposal – printer-friendly	0	102	102	0%	100%
Attachment 01-01	0	12	12	0%	100%
Attachment 01-02	0	12	12	0%	100%
Attachment 01-03	0	6	6	0%	100%
Attachment 02-01	0	46	46	0%	100%
Attachment 02-02	0	127	127	0%	100%

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
Attachment 02-03	0	17	17	0%	100%
Attachment 02-04	0	18	18	0%	100%
Attachment 02-05	0	3	3	0%	100%
Attachment 02-06	0	19	19	0%	100%
Attachment 05-01	2	173	175	1%	99%
Attachment 05-02	0	18	18	0%	100%
Attachment 05-03	0	108	108	0%	100%
Attachment 05-04	0	53	53	0%	100%
Attachment 05-05	0	17	17	0%	100%
Attachment 05-06	1	88	89	1%	99%
Attachment 05-07	0	42	42	0%	100%
Attachment 05-08	0	2	2	0%	100%
Attachment 05-09	0	30	30	0%	100%
Attachment 05-10	0	14	14	0%	100%
Attachment 05-11	0	15	15	0%	100%
Attachment 06-01	0	56	56	0%	100%
Attachment 06-02	0	33	33	0%	100%
Attachment 06-03	0	24	24	0%	100%
Attachment 06-04	0	11	11	0%	100%
Attachment 06-05	7	30	37	18%	82%
Attachment 06-06	27	0	27	100%	0%

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
Attachment 06-07	0	10	10	0%	100%
Attachment 07-01	0	25	25	0%	100%
Attachment 07-02	0	13	13	0%	100%
Attachment 07-03	2	4	6	33%	67%
Attachment 07-04	0	16	16	0%	100%
Attachment 07-05	0	21	21	0%	100%
Attachment 07-06	0	15	15	0%	100%
Attachment 07-07	0	19	19	0%	100%
Attachment 07-08	3	17	20	15%	85%
Attachment 07-09	0	39	39	0%	100%
Attachment 07-10	0	16	16	0%	100%
Attachment 07-11	0	45	45	0%	100%
Attachment 07-12	0	19	19	0%	100%
Attachment 07-15	0	14	14	0%	100%
Attachment 07-16	0	6	6	0%	100%
Attachment 07-17	0	12	12	0%	100%
Attachment 07-18	0	5	5	0%	100%
Attachment 07-19	0	2	2	0%	100%
Attachment 07-20	0	7	7	0%	100%
Attachment 07-21	0	10	10	0%	100%
Attachment 07-22	0	5	5	0%	100%

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
Attachment 07-23	0	14	14	0%	100%
Attachment 07-24	0	13	13	0%	100%
Attachment 07-25	0	11	11	0%	100%
Attachment 07-26	0	11	11	0%	100%
Attachment 07-27	0	14	14	0%	100%
Attachment 07-28	0	10	10	0%	100%
Attachment 07-29	2	7	9	22%	78%
Attachment 07-30	0	12	12	0%	100%
Attachment 07-31	23	34	57	40%	60%
Attachment 07-32	0	16	16	0%	100%
Attachment 07-33	0	10	10	0%	100%
Attachment 07-34	7	11	18	39%	61%
Attachment 07-35	0	5	5	0%	100%
Attachment 08-01	0	82	82	9%	91%
Attachment 08-02	0	218	218	0%	100%
Attachment 08-03	1	10	11	0%	100%
Attachment 08-04	0	20	20	0%	100%
Intervening period	0	34	34	0%	100%
<b>Total</b>	<b>53</b>	<b>2,066</b>	<b>2,119</b>	<b>2.5%</b>	<b>97.5%</b>

Note: This notice is an approximate indication of the proportion and comparative proportion of material in JEN's regulatory proposal that is subject to a claim of confidentiality compared to that which is not.