

Jemena Electricity Networks (Vic) Ltd

**2016-20 Electricity Distribution Price Review
Regulatory Proposal**

Revocation and substitution submission

Attachment 1-1 Claims for Confidentiality

Public

6 January 2016



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1. CONFIDENTIALITY CLAIMS

1. Table 1-1 sets out specific sections of Jemena Electricity Network (**JEN**) electricity distribution price review (**EDPR**) revocation and substitution submission that JEN claims to be commercial-in-confidence and the basis of the claim.¹
2. JEN has applied the rationale for claiming information as commercial-in-confidence as set out in the Australian Energy Regulator's (**AER's**) confidentiality guideline.
3. JEN has provided reasons detailing how and why disclosure of the information would cause detriment to the business. 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.
4. JEN 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, JEN has made it clear in Table 1-1 that the relevant item is subject to a confidentiality claim.
5. JEN has marked confidential information in spreadsheets by formatting the cells as [c-i-c].

¹ The AER served JEN a final EDPR regulatory information notice (RIN) on 30 January 2015. 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.

Table 1–1: JEN 2016-20 EDPR revocation and substitution 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
Revocation and substitution submission overview						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Customer overview						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Fact sheet						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
JEN ATTACHMENTS						
Attachment 1-1 - Confidentiality claims						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 1-2 – Interrelationships, errors and countervailing benefits						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 1-3 – Continuing engagement with our customers						
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
Attachment 2-1 – Classification of services						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 2-2 – Price control mechanisms						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 3-1 – Incentive mechanisms						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 4-1 – Risk management framework						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 5-1 – Revenue requirement and true-up						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 5-2 – PTRM model						
'PTRM input' worksheet Cells: F269:L274	Individual customer forecast prices (Base year prices per tariff component for 2015)	PTRM	Personal information & market sensitive cost inputs	Contains easily identifiable personal information relating to individual customer prices (or enables this to be derived). Disclosing future prices that are applicable to individual customers, could lead to	Contains easily identifiable personal information relating to individual customer prices (or enables this to be derived). Disclosing future prices that are applicable to individual customers, could	While the detriment of publishing the information is clear, JEN is not aware of any material incremental 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
				bypass of the network and detrimentally impact JEN's legitimate business interests and lead to higher long term costs for all customers.	lead to bypass of the network and detrimentally impact JEN's legitimate business interests and lead to higher long term costs for all customers.	
'Forecast revenues' worksheet Cells: F74:EG79	Individual customer forecast prices	PTRM	Personal information & market sensitive cost inputs	Contains easily identifiable personal information relating to individual customer prices (or enables this to be derived). Disclosing future prices that are applicable to individual customers, could lead to bypass of the network and detrimentally impact JEN's legitimate business interests and lead to higher long term costs for all customers.	This is private information relating to individual customers' demand and/or bills. Disclosing future prices that are applicable to individual customers, could lead to bypass of the network and detrimentally impact JEN's legitimate business interests and lead to higher long term costs for all customers.	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis
'Forecast revenues' worksheet Cells: F112:EG117	Forecast revenues	PTRM	Personal information	Contains easily identifiable personal information relating to individual customer demand and revenue (or enables this to be derived).	This is private information relating to individual customers' demand and/or bills.	While the detriment of publishing the information is clear, JEN is not aware of any material incremental 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
Attachment 5-3 – RAB roll forward model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 5-4 – Asset base roll forward and depreciation						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 5-5 – 2010 s-factor close out model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-1 – Rate of return						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-2 – Rate of return model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-3 – Averaging periods						
Paragraph 6, p. 1. (eight highlighted items)	JEN's proposed averaging period for the allowed return on debt for the years two to five of the 2016 regulatory period.	WACC - Nominated averaging period	Market sensitive cost inputs	SGSPAA (on JEN's behalf) intends to use the averaging periods to either issue debt or enter hedging transactions so that it can align its actual cost of debt to the allowed return on debt. Release of this information	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.	There is no material benefit to customers from knowing this period in advance, but the detriment to JEN (and therefore its customers) could be significant.

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				before the averaging period has passed could affect market behaviour.		
Attachment 6-4 – The required return on equity under a foundation model approach						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-5 – The relationship between government bond yields and the market risk premium						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-6 – Estimating the equity beta for the benchmark efficient entity						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-7 – The Cost of Equity: Response to the AER’s Draft Decisions for the Victorian Electricity Distributors						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-8 – Criteria for assessing fair value curves						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-9 – Critique of the AER’s approach to transition						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-10 – September 2015 cost of debt and inflation forecasts						
No confidential	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
information						
Attachment 6-11 – Critique of AER analysis of New Issue Premium						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 6-12 – The appropriate use of tax statistics when estimating gamma						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-1 – Forecast capital expenditure						
Table 5-4 p. 24.	Customer information	Capex	Personal information, Information affecting the security of the network.	The information relates to individual customer demand at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties. Additionally, the project relates to critical infrastructure and revealing details would better enable a malicious attack.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests. Additionally, the project relates to critical infrastructure and revealing details would better enable a malicious attack.	While the detriment of publishing the information is clear, JEN 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.
Attachment 7-2 – Capex model						
Whole model	JEN's capex forecast model	Capex forecast methodology	Market intelligence and market sensitive cost inputs	The model and methodology is proprietary information that if disclosed would diminish the intellectual	The model and methodology is proprietary information that if disclosed would diminish	JEN provides detailed capex information in its proposal and via its public RIN response. JEN does not consider there

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				<p>property JEN 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 JEN 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 intellectual property JEN 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 JEN 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 JEN's legitimate business interests and, ultimately, increase costs passed on to customers.</p>	<p>would be any additional public benefit to disclosure of the information via the capex forecast model.</p> <p>JEN (and therefore its customers) should not be funding or producing intellectual property that would benefit those other than JEN and its customers. Disclosure would reduce JEN's incentive to produce intellectual property and innovate in ways that might enhance the long term interests of consumers.</p>
Attachment 7-3 – Demand forecast						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A

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Attachment 7-4 – Demand forecast report						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-5 – Demand forecast models						
All electricity demand forecast models including: <ul style="list-style-type: none"> • Summer system model • Winter system model 	ACIL Allen proprietary methodologies	ACIL Allen demand and customer forecasts	Market intelligence and personal information	Model contains proprietary information that if disclosed would provide an advantage to ACIL Allen’s competitors. Contains easily identifiable personal information relating to individual customer demand.	ACIL Allen operates in a competitive market, and disclosing their proprietary information would provide an advantage to ACIL Allen’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.	JEN’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 EDPR process. Additionally, the model includes private information relating to individual customers’ demand and/or bills.
Attachment 7-6 – Load demand forecast 2015						
Paragraph 1 and Table ES-2 p viii.	Customer information	Demand	Personal information	The information relates to individual customer demand at customer- owned substations. Disclosure would potentially expose information that is	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties’ legitimate business	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to

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				commercially sensitive to those parties.	interests.	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 2 p 9.	Customer information	Demand	Personal information	The information relates to individual customer demand at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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 E3-2 p 10.	Customer information	Demand	Personal information	The information relates to individual customer demand at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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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						access to the information for the relevant interested parties involved in regulatory processes.
2 nd bullet, paragraph 1, p. 10	Customer information	Demand	Personal information	The information relates to individual customer demand at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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 4-1, p. 12	Customer information	Demand	Personal information	The information relates to individual customer demand and embedded generation levels at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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

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						processes.
All tables, as marked pp. 19, 23, 29, 32-34, 36, 37, 53, 61, 62, 68-72, 77, 78, 80, 81, 88, 89, 91, 93-96, 99-101, 105, 106	Customer information	Demand	Personal information	The information relates to individual customer demand and embedded generation levels at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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 A, p. 108	Customer information	Demand growth rates	Personal information	The information relates to individual customer demand at customer- owned substations. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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.

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Attachment 7-7 – Forecast customer numbers						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-8 – Forecast customer numbers report						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-9 – Forecast customer numbers model						
Whole model	ACIL Allen proprietary methodologies	ACIL Allen demand and customer forecasts	Market intelligence and personal information	Model contains proprietary information that if disclosed would provide an advantage to ACIL Allen’s competitors. Contains easily identifiable personal information relating to individual customer demand.	ACIL Allen operates in a competitive market, and disclosing their proprietary information would provide an advantage to ACIL Allen’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.	JEN’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 EDPR process. Additionally, the model includes private information relating to individual customers’ demand and/or bills.
Attachment 7-10 – Addendum to April 2015 repex report						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A

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Attachment 7-11 – PB report on Sunbury						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-12 – Revised Sunbury network development strategy						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-13 – PB report on Flemington						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-14 – Revised Flemington network development strategy						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-15 – PB report on Preston						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-16 – Demand management options						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-17 – Power of choice business case						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A

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Attachment 7-18 – Deloitte - Power of choice business case						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-19 – Melbourne Airport development strategy						
Whole document	Customer information	Network development strategy	Personal information, Market sensitive cost inputs	The information relates to individual customer demand and forecast growth driven by a single customer's expansion plans. Disclosure would potentially expose information that is commercially sensitive to those parties.	Disclosure of individual customer information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	While the detriment of publishing the information is clear, JEN 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.
Attachment 7-20 – Addendum to Preston Network Development strategy						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 7-21 – Updated RIN templates						
'2.2 Repex (CA RIN 2013)' worksheet Cells D11:H151	Expenditure information that can be used to derive implied unit rates	Replacement capex activities	Market sensitive cost inputs	Implied unit rates for various replacement activities can be derived when expenditure is divided by the corresponding volumes. This could reveal	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this

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				underlying supplier prices, internal labour costs, and information which would affect JEN's (and third party suppliers) ability to obtain competitive prices in future procurement processes.	such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	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.
Attachment 8-1 – Operating expenditure forecasting method and base year efficiency						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-2 – Operating expenditure step changes report						
p. iv Contents references to chapter 11 and Table 11-1	Insurance premiums	Opex step changes	Market sensitive cost information, information affecting the security of the network.	The information would reveal the insurance type and therefore the relevant expected premiums which JEN is seeking coverage for. This would potentially create a floor price and impact JEN's ability to negotiate for the insurance cover. Additionally, JEN competes with other utilities for this type of insurance cover in a new and small Australian market.	The risks identified by JEN would allow external parties, potential tenderers and competitors to determine the areas JEN views as their biggest exposure with the largest severity in the event of an incident.	JEN's customers would be detrimentally impacted if: <ul style="list-style-type: none"> JEN's ability to negotiate price and coverage terms with insurers deteriorates JEN's competitors for this type of insurance could gain competitive advantage in a new and small market security of the network is put at risk or breached—the information pinpoints the areas JEN identifies as its largest exposure or

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				<p>The information identifies the category of risks that JEN view as having a potential impact on business operations. This information has a direct relationship on the security of the network and the price paid for insurance coverage.</p>		<p>commercial vulnerability</p>
<p>Table OV-1, p. xii</p>	<p>Insurance premiums</p>	<p>Opex step changes</p>	<p>Market sensitive cost information, information affecting the security of the network.</p>	<p>The information would reveal the insurance type and therefore the relevant expected premiums which JEN is seeking coverage for. This would potentially create a floor price and impact JEN's ability to negotiate for the insurance cover.</p> <p>Additionally, JEN competes with other utilities for this type of insurance cover in a new and small Australian market.</p> <p>The information identifies the category of risks that JEN view as having a potential impact on business operations. This information has a direct relationship on</p>	<p>The risks identified by JEN would allow external parties, potential tenderers and competitors to determine the areas JEN views as their biggest exposure with the largest severity in the event of an incident.</p>	<p>JEN's customers would be detrimentally impacted if:</p> <ul style="list-style-type: none"> • JEN's ability to negotiate price and coverage terms with insurers deteriorates • JEN's competitors for this type of insurance could gain competitive advantage in a new and small market • security of the network is put at risk or breached—the information pinpoints the areas JEN identifies as its largest exposure or commercial vulnerability

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				the security of the network and the price paid for insurance coverage.		
3 rd bullet, paragraph 85, p. 15.	Legal advice relating to vegetation management	Opex step changes	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.
Final bullet, paragraph 89, p. 16.	Legal advice relating to vegetation management	Opex step changes	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.

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Paragraph 94, p. 17.	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
Paragraph 95, p. 18. (3 instances)	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
Paragraph 100, p. 18.	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could	Revealing unit rates for procuring particular types of materials or services could set a floor in the	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit

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				affect JEN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	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 101, p. 19.	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
Paragraph 107, p. 20. (3 instances).	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN's (and third party service providers') ability to obtain competitive prices in future procurement	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 JEN's legitimate	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality

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				processes.	business interests and, ultimately, increase costs passed onto customers.	arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
Paragraph 111 First and 4 th bullet pp. 21-22. (6 instances).	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
Footnote 60, p. 22.	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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

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
						regulatory processes.
Paragraph 122, p. 23.	Unit rates	Opex	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
Section 5.3.5 pp. 24-25.	Legal advice relating to vegetation management	Opex step changes	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.
Table 5-3, p. 27.	Legal advice relating to vegetation	Opex step changes	Other	This section contains sensitive legal advice	Release of the information may adversely impact	There is potential detriment to JEN but no real public benefit

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
	management			obtained by JEN as to its legal obligations and risks.	JEN's commercial position	if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.
Section 11 – entire section pp. 42-43	Insurance premiums	Opex step changes	Market sensitive cost information, information affecting the security of the network.	<p>The information would reveal the insurance type and therefore the relevant expected premiums which JEN is seeking coverage for. This would potentially create a floor price and impact JEN's ability to negotiate for the insurance cover.</p> <p>Additionally, JEN competes with other utilities for this type of insurance cover in a new and small Australian market.</p> <p>The information identifies the category of risks that JEN view as having a potential impact on business operations. This information</p>	The risks identified by JEN would allow external parties, potential tenderers and competitors to determine the areas JEN views as their biggest exposure with the largest severity in the event of an incident.	<p>JEN's customers would be detrimentally impacted if:</p> <ul style="list-style-type: none"> • JEN's ability to negotiate price and coverage terms with insurers deteriorates • JEN's competitors for this type of insurance could gain competitive advantage in a new and small market • security of the network is put at risk or breached—the information pinpoints the areas JEN identifies as its largest exposure or commercial vulnerability

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				has a direct relationship on the security of the network and the price paid for insurance coverage.		
Attachment 8-3 – Operating expenditure forecasting model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-4 – IJM Consulting - audit report of JEN's compliance with Electricity Safety 2010 Regulations						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-5 – Select Solutions - letter confirming vegetation growth rates						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-6 - Susan Brennan QC - advice on vegetation management matters						
Section: 'Introduction', Paragraph 1, p. 1.	Legal advice	Vegetation management step change	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.

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
Section: 'Introduction', Paragraph 2(c), p. 1.	Legal advice	Vegetation management step change	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.
Section: 'Advice which must be provided to municipal councils', Paragraph 46 to 54 pp. 16–18.	Legal advice	Vegetation management step change	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.
Section: 'Overall conclusions on ESV's interpretation as to the effect of obligations	Legal advice	Vegetation management step change	Other	This section contains sensitive legal advice obtained by JEN as to its legal obligations and risks.	Release of the information may adversely impact JEN's commercial position	There is potential detriment to JEN but no real public benefit if the information is released. The AER has the information and is able to assess it in

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
contained in the 2015 Regulations', Paragraph 56, p 19.						making its regulatory determination. Sufficient information is provided in our step change attachment for the public to assess the general efficiency of our proposal.
Attachment 8-7 - Letter from JEN to ESV						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-8 - Letter from ESV to JEN						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-9 - Letter from ESV to JEN						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-10 - Definition of RIN actuals						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-11 - Business case for RIN actuals						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 8-12 - Conversion of RIN information to actuals						
No confidential	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
information						
Attachment 8-13 - JEN GSL and Chapter 5A step change						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 9-1 – Alternative control metering services						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 9-2 – PTRM ACS metering						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 9-3 – ACS metering capex model						
Whole model	JEN's capex forecast model - metering	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 JEN 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 JEN and its potential service providers.</p>	<p>The model and methodology is proprietary information that if disclosed would diminish the intellectual property JEN 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</p>	<p>JEN provides detailed capex information in its proposal and via its public RIN response. JEN does not consider there would be any additional public benefit to disclosure of the information via the capex forecast model.</p> <p>JEN (and therefore its customers) should not be funding or producing intellectual property that would benefit those other than JEN and its customers. Disclosure would reduce JEN's incentive</p>

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
				The project totals could also be used in combination with a public version of the RIN response to determine margins.	gain an insight into how much JEN 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 JEN's legitimate business interests and, ultimately, increase costs passed on to customers.	to produce intellectual property and innovate in ways that might enhance the long term interests of consumers.
Attachment 9-4 – ACS metering opex model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 9-5 – ACS roll forward model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 9-6 – Metering exit fees model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 9-7 – Benchmarking Victorian metering expenditure from 2009 to 2014						
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
Attachment 9-8 – Report on metering base year adjustment						
Whole report	Metering on metering base year adjustment	Metering	Other	Information relates to advice from JEN's auditors. See Attachment A for additional information provided by KPMG as JEN's auditors.	<p>Detriment to KMPG from disclosure includes:</p> <ul style="list-style-type: none"> Breaching KPMG's intellectual property Inappropriate 3rd party reliance on the material. <p>See Attachment A for additional information provided by KPMG as JEN's auditors.</p>	<p>While the detriment of publishing the information is clear, JEN 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.</p> <p>Customers would also be detrimentally impacted if auditors are less willing to engage with JEN to undertake and provide the required advice.</p> <p>See Attachment A for additional information provided by KPMG as JEN's auditors.</p>
Attachment 10-1 – Other services (ACS and Negotiated)						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A

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Attachment 10-2 – Public lighting charges model						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Attachment 10-3 – ACS ancillary network services - cost build up model						
“NC - single ph” worksheet Cells: B4:B14, D4:G14, G15, B18, B20:B26, D16:G18. D20:G26, G27. D28:G29. G30:G33, D35:G43	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN’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 JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
“NC - single ph (AER Prelim)” worksheet Cells: B4:B14, D4:G14, G15, B16, B18:B24, D16:G16. D18:G24, H24. G26:G29. G30:G33, D31:G33	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN’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 JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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

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						involved in regulatory processes.
<p>“NC - three ph” worksheet Cells: B4:B14, D4:G14, G15, B18, B20:B26, D16:G18. D20:G26, G27. D28:G29. G30:G33, D35:G43</p>	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
<p>“NC - three ph (AER Prelim)” worksheet Cells: B4:B14, D4:G14, G15, B16, B18:B24, D16:G16. D18:G24, H24. G26:G29. G30:G33, D31:G33</p>	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.

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>“Truck visit - BH” worksheet Cells: B4:B14, D4:G14, G15, B18, D16:G18, B20:B25. D20:G25, D26:G29. D32:G40</p>	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN’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 JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
<p>“Wasted Truck visit - BH” worksheet Cells: B4:B14, D4:G14, G15, B18, D16:G18, B20:B25. D20:G25, D26:G29. D32:G40</p>	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN’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 JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
<p>“Fault Respond” worksheet Cells: B4:B14,</p>	Contractor rates and service provider rates (business hours and	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs	Revealing unit rates for procuring particular types of materials or services	While the detriment of publishing the information is clear, JEN is not aware of any

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
D4:G14, G15, B18, D16:G18, B20:B25. D20:G25, D26:G29. D32:G40	after hours)			which, if published, could affect JEN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	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.
"Temp – single ph" worksheet Cells: B4:B14, D4:G14, G15, B18, B20:B26, D16:G18. D20:G26, G27. D28:G29. G30:G33, D35:G43	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
"Temp – three ph" worksheet Cells: B4:B14, D4:G14, G15, B18, B20:B26, D16:G18. D20:G26, G27.	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN's (and third party service providers') ability to	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future.	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to

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
D28:G29, G30:G33, D35:G43				obtain competitive prices in future procurement processes.	Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	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.
“Manual re-en” worksheet Cells: B5:B8, D5:G8, G9, G11:G12, D14:G22	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
“Manual de-en” worksheet Cells: B5:B8, D5:G8, G9, G11:G12, D14:G22	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and,	While the detriment of publishing the information is clear, JEN 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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					ultimately, increase costs passed onto customers.	access to the information for the relevant interested parties involved in regulatory processes.
“temporary disconnect” worksheet Cells: B4:B9, D4:G9, G10, G12:G13, D15:G23	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
“Manual meter reads” worksheet Cells: B4:B7, D4:G7, G8, G10:G11, D13:G21	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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

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						processes.
“Re-test” worksheet Cells: B4:B12, D4:G12, G13, G15:G16, D18:G26	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
“Remote reconf” worksheet Cells: B4:B8, D4:G8, G19, D11:G19	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
“Remote en”	Contractor rates and service provider rates	Unit rates	Market sensitive	This information contains underlying internal (and	Revealing unit rates for procuring particular types	While the detriment of publishing the information is

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
worksheet Cells: B5, D5:G5, G9, D8:G16	(business hours and after hours)		cost inputs	contractor) labour costs which, if published, could affect JEN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	clear, JEN 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.
"Type 7 metering" worksheet Cells: D8:G10	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
"Customer access to meter data" worksheet Cells: B5:G17	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN's (and third party	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring	While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this

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
Attachment 10-4 – ACS ancillary network services - forecast charges model						
“Input Costing” sheet Cells: K14:K17, M14:M17, O14:P17, K23:K39, M23:M39, N49:S49, O23:P39, AM14:AM17, AM23:AM39, AO14:AO17, AO23:AO39, AQ14:AR17, AQ23:AR39, S14:T17, V14:W17 S23:T39, V23:W39 AU14:AV17, AU23:AV39, AX14:AY17, AX23:AY39	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN’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 JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.

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
'Input Assumptions" worksheet Cells: N49:S49	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
'Calc Base year cost" worksheet Cells: K14:K17, K26, K29:K31, K38, R14:R17, R26, R29:R31, R38	Contractor rates and service provider rates (business hours and after hours)	Unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.

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
Attachment 10-5 – Revised negotiation framework						
No confidential information	N/A	N/A	N/A	N/A	N/A	N/A
Supporting Documentation²						
Supporting documents reference numbers: A001 to A082 Please see the index (supporting document reference:000) in the supporting documentation for a full list of confidential rate of return supporting documents	Documents referenced by JEN and provided to the AER to assist its assessment	WACC	Other	JEN does not own the copyright in the work and to publish the information would require JEN to obtain the permission and be licensed by the copyright owner. This would likely involve a lengthy commercial negotiation and the payment of a significant licence fee.	JEN does not own the copyright and to publish the information would place JEN in breach of the Copyright Act 1968.	JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
JEN safety management scheme – synopsis Document	Risk management	Risk management	Information affecting the security of the network.	This information provides specific details on strategies used by Jemena to secure our network.	Revealing JEN's strategy to secure our network strategies would better enable a malicious attack.	JEN's customers would be detrimentally impacted if security of the network is put at risk or breached. JEN is not

² Note that confidentiality claims for the supporting documentation relating to JEN's Q&A with the AER on JEN's April 2015 proposal and response to the EDPR reset RIN are provided within JEN's response to each AER question (unless the question was stipulated by the AER in which case confidentiality of JEN's response is implied). Confidentiality claims for JEN's April 2015 proposal and EDPR reset RIN are also provided with those submissions.

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
reference no: B011						aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Saferoads Pty Ltd - Pole pricing quote Document reference no: B012 Entire document	Unit rates	Alternative Control Services	Market sensitive cost inputs	This information contains underlying internal (and contractor) unit rate costs and supplier prices which, if published, could affect JEN'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 JEN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JEN 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.
Long term impacts to consumers, Document reference no: A083 Entire section 2 pp. 9-19.	Description of potential impacts on JEN expenditure if the JEN'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	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 JEN is forecast to pay in specified areas of	While the detriment of publishing the information is clear, JEN 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
				processes between JEN and its potential service providers.	its business, together with information about particular projects currently being planned. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed on to customers.	
Long term impacts to consumers, Document reference no: A083 Entire section 4 p 27.	Description of potential impacts on JEN expenditure if the JEN'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 JEN 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 JEN is forecast to pay in specified areas of its business, together with information about particular projects currently being planned. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed on to customers.	While the detriment of publishing the information is clear, JEN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis.

2. PROPORTION OF CONFIDENTIAL INFORMATION

6. Section 3.3 of the AER’s confidentiality guideline requires that Distribution Network Service Providers must 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 our submission which contain a confidential claim and the number of pages which do not. Table 2-1 contains the required information for JEN’s revocation and substitution submission.
7. 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. Supporting documentation is often subject to copyright and the relevant page count is provided at the bottom of Table 2-1.

Table 2–1: JEN 2016-20 EDPR revocation and substitution submission—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 Customer Overview, and Regulatory Proposal (excluding attachments)	0	107	107	0%	100%
Total Customer Overview, and Regulatory Proposal (including attachments)	240	2392	2632	9%	91%
Total Customer Overview, and Regulatory Proposal (including attachments and supporting documentation)	2660	10683	13343	20%	80%
By document					
Revocation and substitute submission overview	0	77	77	0%	100%
Customer Overview	0	28	28	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
Fact sheet	0	2	2	0%	100%
Attachments					
1-1	0	54	54	0%	100%
1-2	0	18	18	0%	100%
1-3	0	24	24	0%	100%
2-1	0	16	16	0%	100%
2-2	0	23	23	0%	100%
3-1	0	36	36	0%	100%
4-1	0	33	33	0%	100%
5-1	0	20	20	0%	100%
5-2	2	18	20	10%	90%
5-3	0	13	13	0%	100%
5-4	0	22	22	0%	100%
5-5	0	8	8	0%	100%
6-1	0	137	137	0%	100%
6-2	0	9	9	0%	100%
6-3	1	3	4	25%	75%
6-4	0	107	107	0%	100%
6-5	0	72	72	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
6-6	0	70	70	0%	100%
6-7	0	95	95	0%	100%
6-8	0	100	100	0%	100%
6-9	0	114	114	0%	100%
6-10	0	6	6	0%	100%
6-11	0	33	33	0%	100%
6-12	0	67	67	0%	100%
7-1	1	50	51	2%	98%
7-2	23	0	23	100%	0%
7-3	0	19	19	0%	100%
7-4	0	51	51	0%	100%
7-5	11	0	11	100%	0%
7-6	37	80	117	32%	68%
7-7	0	16	16	0%	100%
7-8	0	44	44	0%	100%
7-9	13	0	13	100%	0%
7-10	0	4	4	0%	100%
7-11	0	32	32	0%	100%
7-12	0	19	19	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
7-13	0	26	26	0%	100%
7-14	0	36	36	0%	100%
7-15	0	32	32	0%	100%
7-16	0	71	71	0%	100%
7-17	0	75	75	0%	100%
7-18	0	57	57	0%	100%
7-19	75	1	76	99%	1%
7-20	0	13	13	0%	100%
7-21	0	7	7	0%	100%
8-1	0	35	35	0%	100%
8-2	16	75	91	18%	82%
8-3	0	13	13	0%	100%
8-4	0	29	29	0%	100%
8-5	0	2	2	0%	100%
8-6	5	15	20	25%	75%
8-7	0	5	5	0%	100%
8-8	0	2	2	0%	100%
8-9	0	5	5	0%	100%
8-10	0	23	23	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
8-11	0	46	46	0%	0
8-12	0	61	61	0%	0
8-13	0	9	9	0%	0
9-1	0	65	65	0%	0
9-2	0	15	15	0%	0
9-3	25	0	25	100%	25
9-4	0	12	12	0%	0
9-5	0	14	14	0%	0
9-6	0	13	13	0%	0
9-7	0	38	38	0%	0
9-8	9	1	10	90%	9
10-1	0	26	26	0%	0
10-2	0	21	21	0%	0
10-3	18	3	21	86%	18
10-4	3	13	16	19%	3
10-5	0	13	13	0%	0
Supporting documentation (see note 3)	2420	8291	10711	23%	77%

(1) This is an approximate indication of the proportion of material in JEN's 2016-20 EDPR revocation and substitution submission—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.

- (3) For simplicity the page count excludes the following supporting information to JEN's 2016-20 EDPR revocation and substitution submission: JEN's April 2015 proposal, EDPR RIN documentation, correspondence with the AER for questions and answers on the April 2015 proposal and EDPR RIN, WACC supporting documents submitted with the April 2015 proposal..

Attachment A
Letter from KPMG related to Attachment 9-08



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Matthew Serpell
Jemena Electricity Networks (Vic) Ltd
321 Ferntree Gully Road
Mount Waverley VIC 3149

Our ref 44054166_1

By email

23 December 2015

Dear Matthew

Jemena - agreed upon procedures

We understand that it is contemplated that the Australian Energy Regulator (**AER**) may publicly disclose a report by KPMG to the Management of Jemena Electricity Networks (Vic) Ltd (**Jemena**) dated 18 December 2015 (**KPMG document**).

KPMG opposes any public disclosure of the KPMG document on the basis that disclosure has the potential to cause detriment to KPMG and there are public interest factors that favour not disclosing the KPMG document.

Potential detrimental effect of disclosure on KPMG

In accordance with the engagement letter dated 2 December 2015 (**Engagement Letter**) KPMG was engaged to perform agreed upon procedures for Jemena and to prepare a report on factual findings to the Management of Jemena. The Engagement Letter states that:

- (a) *“As required by ASRS 4400, use of our report will be restricted to Jemena the intended user, who has agreed the procedures to be performed with us, since others, unaware of the reasons for the procedures, may misinterpret the results”;*
- (b) *“The report should not be distributed to parties other than the intended users and the AER, who will receive a copy of the report on a hold harmless basis as communicated through the transmittal letter in Appendix 2”;* and
- (c) *“We expressly disclaim and do not accept any responsibility or liability to any party other than Jemena for any consequence of distribution or reliance on our report for any purpose”.*

The KPMG document was prepared within the context of the above engagement. KPMG notes that the KPMG document:

- (a) was intended to be a private communication between KPMG and the Management of Jemena;
- (b) was intended to be provided to the AER only on a hold harmless basis;

- (c) contains the intellectual property of KPMG;
- (d) was prepared in accordance with the Engagement Letter and the engagement was neither planned nor conducted in contemplation of the purposes for which third parties may access the KPMG document; and
- (e) does not contain the normal disclaimers and statements of non-reliance that KPMG usually includes in documents that are prepared with public or third party disclosure in mind.

In accordance with the Engagement Letter, Jemena will provide a copy of the KPMG document to AER with a transmittal letter dated 18 December 2015 (**Transmittal Letter**). KPMG reiterates the conditions and understanding raised in the Transmittal Letter and particularly the conditions that:

- (a) *“The Report is strictly confidential and will be treated as such by you. You must ensure that the Report is not, in whole or in part, shown, copied, provided, disseminated, given to or relied on by any other person without our express written consent which may be granted at our absolute discretion and subject to conditions”*; and
- (b) *“You must not name us in any report or document which will be publicly available or lodged or filed with any regulator without our prior written consent, which may be granted at our absolute discretion and be subject to conditions”*.

KPMG maintains that disclosure of the KPMG document could be to the detriment of KPMG for the following reasons:

- (a) broader disclosure of the KPMG document may breach KPMG’s intellectual property rights in the KPMG document;
- (b) the broader disclosure of the document could expose KPMG to a risk that a third party may inappropriately make use of or rely upon the KPMG document; and
- (c) any losses incurred by KPMG by reason of the broader disclosure may result in a need for proceedings to be brought to recover damages in respect of such losses.

Public interest factors against disclosure

KPMG notes that, in addition to the potential detriment to its position, there are also the following public interest factors against disclosure:

- (a) if the communications of auditors engaged by licensees to perform non-statutory auditing services are to be disclosed such auditors may:
 - (i) seek to reduce the amount of communication involved in an audit so as to avoid onward disclosure, potentially impacting on the free flow of information that forms part of an audit;
 - (ii) place a greater emphasis on all communications on the understanding that they may be disclosed, potentially increasing the duration and cost of any audit;

- (iii) view engagements to conduct audit work for licensees as more complex and higher risk, potentially making it more difficult for licensees to appropriately engage non-statutory auditors; and
- (b) it is unlikely that the AER will be assisted in increasing stakeholder confidence through disclosure of a document that:
 - (i) was prepared solely for the information of the Management of Jemena and was not prepared to reflect the needs or interest of other parties; and
 - (ii) was not prepared by KPMG for reliance upon by any third party.

In the circumstances, KPMG maintains that there would not be a sufficient public benefit in disclosure of the KPMG document that would outweigh the detriment to KPMG.

If you have any questions with respect to KPMG's position please contact Vicky Carlson on +61 3 9838 4027.

Yours Sincerely



Vicky Carlson
Partner