



## **Jemena Gas Networks (NSW) Ltd**

### **Response to the 2020-25 Access Arrangement Regulatory Information Notice**

RIN Attachment 13

Confidentiality claims



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## 1. Access Arrangement RIN Response confidentiality claims

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
<b>RIN Attachment 1 - Written Response</b>						
Schedule 3 Historical Information, 2 Compliance with Current AA Responses to paragraphs 2.4 and 2.6	Identification of the names or addresses of specific customers or delivery points	Delivery point re-assignments	Other	Information identifies individual customers.	Information identifies individual customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
Schedule 3 Historical Information, 2 Compliance with Current AA Responses to paragraph 2.10	Identification of users requesting tariff re-assignment	Tariff re-assignment	Other	Information identifies individual users.	Information identifies individual users.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
<b>RIN Attachment 2 - Basis of Preparation</b>						
Page 45, Section "E20.2.2 – Non-Reference Services"	Customer information	Customer information	Market sensitive cost inputs	The information is financial information that relates to a small number of customers.	Publicly disclosing the information may undermine the business interests of the related customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
<b>RIN Attachment 3 - JGN - Workbook 1 - Reset (forecast) data – Consolidated</b>						
<b>RIN Attachment 5 - JGN - Workbook 1 - Reset (forecast) data - Estimated Information</b>						
RIN Table E3.1F	Capital Contribution paid by a third parties to JGN	Customer contributions	Market sensitive cost inputs	Capital contribution value relates to individual customer projects in a small segment of the market.	As these services are provided to individuals, publicly disclosing this information could harm JGN and third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
RIN Tables E2.1.1B, E3.1B, E4.1.3B, E4.1.4B, E5.1.1B, E12.1B and E13.1B.	Direct contract expenditure	Capex – unit rates	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
RIN Tables E4.1.1C, E4.1.2C and E4.1.4C.	Other direct expenditure	Capex – unit rates	Market sensitive cost inputs	This information contains underlying material costs which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
RIN Tables E4.2.1, E4.2.2 and E4.2.3.	Meter replacement volumes	Capex – unit rates	Market sensitive cost inputs	Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to JGN's outsourcing arrangements (including structure and activity) are commercially confidential to JGN and could harm JGN's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
					related parties and their unrelated customers.	
RIN Tables E5.1.2 and E5.2.2	Connections volumes and unit rates	Capex – Unit rates	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
RIN Table N1.2 Only relates to rows associated with tariffs DC5, DC9, DMT1, DMT2, DMT3, DCFR1, DCFR6, DMTFR3 and Prudent Discounts)	Demand for tariffs with three or fewer customers	Demand	Market sensitive cost inputs	The tariff classes identified have three or less customers which, if published, could potentially enable the demand from individual customers to be identified.	Public disclosure could potentially harm JGN and the third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
RIN Table F3.1.1 Only relates to rows associated with tariffs DC5, DC9, DMT1, DMT2, DMT3, DCFR1, DCFR6, DMTFR3 and Prudent Discounts	Revenue for tariffs with three or fewer customers	Revenue	Market sensitive cost inputs	The tariff classes identified have three or less customers which, if published, could potentially enable the revenue from individual customers to be identified.	Public disclosure could potentially harm JGN and the third-party's commercial interests.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
RIN Table F3.4	Revenue for non-reference services for three or fewer customers	Revenue	Market sensitive cost inputs	The revenue for non-references services relates to three or fewer customers. If published this could enable the revenue from an individual customer to be identified.	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers receiving the non-reference service.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.
RIN Table F8	Averaging period for equity and debt for each year of 2020-25 AA period	Rate of return	Market sensitive cost inputs	The averaging periods relate to commercially sensitive information about SGSPAA's refinancing and hedging window, as well as commercially sensitive inputs to portfolio growth valuation methodologies, that is not available in public domain.  This information is not required to understand and assess the substance of the issues arising in JGN's AA proposal.	If the information is made public, it would likely to lead to opportunistic behaviour that results in consumers paying high debt costs than would otherwise be the case and also compromises competitively sensitive portfolio information potentially impacting the commercial interests of the group.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
<b>RIN Attachment 6 - Workbook 2 - Historical data - Consolidated</b> <b>RIN Attachment 7 - Workbook 2 - Historical data - Actual Information</b> <b>RIN Attachment 8 - Workbook 2 - Historical data - Estimated Information</b>						
RIN Tables E1.1.1, E2.1.1.E, E2.1.2.E3.1.E, E4.1.1.E, E4.1.2.E, E4.1.3.E, E4.1.4.E, E5.1.1.E, E12.1.E, E13.1.E, E20.3, F2.1.3, F2.3.3, F4.2.2, F4.2.3, F4.2.5, F6.1, F6.2 and F6.3.	Related party expenditure, margin and transaction information (and associated 'total', 'customer contributions' and/or 'direct contractor expenditure' rows to avoid back solving)	Related party margin expenditure	Market sensitive cost inputs	Disclosing the related party margin could harm JGN and related party's commercial interests.	Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	While the detriment of publishing the information is clear, JGN is not aware of any public benefit that would arise from publicly disclosing this information.

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
RIN Tables E2.1.1B, E3.1B, E4.1.3B, E4.1.4B, E5.1.1B, E12.1B and E13.1B.	Capex - Unit rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any public benefit that would arise from publicly disclosing this information.
RIN Tables E3.1F, E5.1.1F(v) and E13.1F.	Capital Contribution paid by a third parties to JGN	Customer contributions	Market sensitive cost inputs	Capital contribution value relates to one customer in a small segment of the market.	As these services are provided to a single party, publicly disclosing this information could harm JGN and third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
RIN Tables E4.1.1C, E4.1.2C, and E4.1.4C.	Meter cost – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying material costs which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
RIN Tables E4.2.1, E4.2.2 and E4.2.3.	Meter replacement volumes	Capex	Market sensitive cost inputs	Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to JGN's outsourcing arrangements (including structure and activity) are commercially confidential to JGN and could harm JGN's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service provides, as well as commercial negotiations between JGN's related parties and their unrelated customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
RIN Table E5.1.2	Connections capex – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
RIN Table E5.2.2	Connections capex – Unit rates	Capex	Other	This information can be used to back-calculate the unit rates.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
RIN Table E5.3.2	Capital Contribution paid by a third parties to JGN	Customer contributions	Market sensitive cost inputs	Where there are three or less customer contributions this data can be used to estimate individual contributions paid by a customer.	Publicly disclosing this information could harm JGN and third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.



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RIN Table N1.2 Only relates to rows associated with tariffs DC5, DC9, DMT1, DMT2, DMT3, DCFR1, DCFR6, DMTFR3 and Prudent Discounts	Demand for tariffs with three or fewer customers	Demand	Market sensitive cost inputs	The tariff classes identified have three or less customers which, if published, could potentially enable the demand from individual customers to be identified.	Public disclosure could potentially harm JGN and the third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
RIN Table F3.1.1 Only relates to rows associated with tariffs DC5, DC9, DMT1, DMT2, DMT3, DCFR1, DCFR6, DMTFR3 and Prudent Discounts	Revenue for tariffs with three or fewer customers	Revenue	Market sensitive cost inputs	The tariff classes identified have three or less customers which, if published, could potentially enable the revenue from individual customers to be identified.	Public disclosure could potentially harm JGN and the third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
RIN Table F3.4	Revenue for non-reference services for three or fewer customers	Revenue	Market sensitive cost inputs	The revenue for non-references services relates to three or fewer customers. If published this could enable the revenue from an individual customer to be identified.	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers receiving the non-reference service.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.
RIN Table F4.1.2, F4.2.2, F4.2.3 and F4.2.5.	Financial adjustments to JGN's financial statements	Financial statement adjustments that reconcile the RIN to the Financial Statements	Market sensitive cost inputs	Most of these adjustments to the financial statements are in relation to the recognition and measurement of financial transactions, which are not regulated. Examples of these are the exclusion of unregulated opex costs from the RIN. Disclosure could harm JGN's legitimate unregulated business interests.	The details relating to JGN's financial statement adjustments are commercially confidential to JGN and could harm JGN's and its unregulated business interests if published. Public disclosure of this information may prejudice as well as commercial negotiations in relation to its unregulated business interests.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis.
RIN Supporting Documents						
<b>2-20.4-1-JGN-Related party agreements</b>						
Section 2.3.2, paragraph 6, and associated footnote (footnote 5) page 5	Contractor pricing and margin	Capex and opex	Market sensitive cost inputs	Disclosing contractor pricing and margin information can harm JGN and the related party's commercial interests.	Revealing margins paid to parties that operate in a competitive market could prejudice future tender and commercial negotiation processes between JGN and its potential service providers, and also Zinfra's negotiations with other clients	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.
Section 2.3.4, paragraph 7, page 6, and last two rows of Table 2-1, and footnotes 12 and 13	Contractor pricing and margin	Capex and opex	Market sensitive cost inputs	Disclosing contractor pricing and margin information can harm JGN's and its service providers commercial interests.	Revealing margins paid to parties that operate in a competitive market could prejudice future tender and commercial negotiation processes between JGN and its potential service providers, and also harm JGN's service providers' commercial negotiations with other clients.	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.
Section 2.4.4, paragraph 4 and paragraph 8, page 8,  Table 2-2, last two rows, page 9 and footnote 20.	Contractor pricing and margin	Capex and opex	Market sensitive cost inputs	Disclosing contractor pricing and margin information can harm JGN and the related party's commercial interests.	Revealing margins paid to parties that operate in a competitive market could prejudice future tender and commercial negotiation processes between JGN and its potential service providers, and also Zinfra's negotiations with other clients	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
Section 3.3, Table 3-1, last two rows, page 12	Contractor pricing and margin	Capex and opex	Market sensitive cost inputs	Disclosing contractor pricing and margin information can harm JGN and the related party's commercial interests.	Revealing margins paid to parties that operate in a competitive market could prejudice future tender and commercial negotiation processes between JGN and its potential service providers, and also Zinfra's negotiations with other clients	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.
Section 4.4, paragraph 3, and Table 4-1, last two rows, p14	Contractor pricing and margin	Capex and opex	Market sensitive cost inputs	Disclosing contractor pricing and margin information can harm JGN and the related party's commercial interests.	Revealing margins paid to parties that operate in a competitive market could prejudice future tender and commercial negotiation processes between JGN and its potential service providers, and also Zinfra's negotiations with other clients	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.
Section 5.1, paragraph 2 bullet points, and section 5.2 second paragraph	Contracting strategy	Contracting strategy for outsourcing arrangements	Strategic information	Disclosing JGN's contracting strategy may adversely impact its contract negotiations	Revealing JGN's contracting strategy could prejudice JGN's commercial negotiation and interfere with competitive market process.	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.
<b>2-20.4-3 to 2.20.4-23 Contracts and associated award/approval documentation</b>						
Individual contracts with related party suppliers and award documentation related to the: <ul style="list-style-type: none"> <li>Asset Management Agreement</li> <li>Northern Services Agreement</li> <li>Field Services Agreement-</li> <li>Capital Works Framework Agreement</li> <li>Metering Services Agreement</li> </ul>	Commercial agreements	Negotiated terms and conditions relating to outsourced services agreement	Market Sensitive cost inputs	Information contains the negotiated commercial terms and conditions including the price of the services	Disclosure could prejudice future tender and commercial negotiation processes between JGN and its potential service providers, and also Zinfra's negotiations with other clients.	Revealing such information could inhibit getting a commercially competitive outcome in future, adversely impacting JGN's future costs and prices which is not in the long-term interests of consumers.
<b>JGN-2-3.15-2-10022734- Bankstown/Chullora/Greenacre 7 kPa-OA-20190327-confidential</b>						
Bankstown/Chullora/Greenacre 7 kPa Network, Appendix B	UAG contract rate	Capex	Market sensitive cost inputs	UAG contract rate is confidential under the terms of the UAG supply contract	JGN would be in breach of UAG purchase contract by publicly disclosing the information	Release of this information could inhibit JGN's ability to secure a competitive UAG rate when it next goes to tender.
<b>JGN-2-3.15-2-10022731-Kurri Kurri Rehabilitation (100kPa)-OA-20190326-confidential</b>						
Kurri Kurri 100kPa Network, Appendix B	UAG contract rate	Capex	Market sensitive cost inputs	UAG contract rate is confidential under the terms of the UAG supply contract	JGN would be in breach of UAG purchase contract by publicly disclosing the information	Release of this information could inhibit JGN's ability to secure a competitive UAG rate when it next goes to tender.
Kurri Kurri 100kPa Network, Appendix D	Benchmark of rehabilitation rates	Capex	Market intelligence	This information contains mains rehabilitation unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for construction of particular types of mains or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
<b>JGN-2-3.15-2-10022510-Matraville 2kPa and 7kPa-OA-20190322-confidential</b>						
Matraville 2kPa and 7kPa Rehabilitation, 2.2.5 Leakage Appendix B	UAG contract rate	Capex	Market sensitive cost inputs	UAG contract rate is confidential under the terms of the UAG supply contract	JGN would be in breach of UAG purchase contract by publicly disclosing the information	Release of this information could inhibit JGN's ability to secure a competitive UAG rate when it next goes to tender.
Matraville 2kPa and 7kPa Rehabilitation, 3.3.1 Benefits Appendix D	Cost per metre of expected project cost and benchmarking rate	Capex	Market intelligence	This information contains mains rehabilitation unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for construction of particular types of mains or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>JGN-2-3.15-2-10022511-Newcastle MP1 (30kPa) Rehabilitation-OA-20190325-confidential</b>						
Newcastle MP1 30kPa Network, 3.3.1 Benefits Appendix D	Cost per metre of expected project cost and benchmarking rate	Capex	Market intelligence	This information contains mains rehabilitation unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for construction of particular types of mains or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Newcastle MP1 30kPa Network, Appendix B	UAG contract rate	Capex	Market sensitive cost inputs	UAG contract rate is confidential under the terms of the UAG supply contract	JGN would be in breach of UAG purchase contract by publicly disclosing the information	Release of this information could inhibit JGN's ability to secure a competitive UAG rate when it next goes to tender.
<b>JGN-2-3.15-2-10022499-Haberfield/Strathfield/Campsie 7kPa-OA-20190325-confidential</b>						
Haberfield/Strathfield/Campsie 7kPa Network Rehabilitation 2.2.4.2 Mains replacement Appendix D	Cost per metre of expected project cost and benchmarking rate	Capex	Market intelligence	This information contains mains rehabilitation unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for construction of particular types of mains or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Haberfield/Strathfield/Campsie 7kPa Network Rehabilitation Appendix B	UAG contract rate	Capex	Market sensitive cost inputs	UAG contract rate is confidential under the terms of the UAG supply contract	JGN would be in breach of UAG purchase contract by publicly disclosing the information.	Release of this information could inhibit JGN's ability to secure a competitive UAG rate when it next goes to tender.
<b>JGN-2-3.15-2-Measurement Asset Class Strategy-20190614-Confidential</b>						
Measurement Asset Class Strategy 4.1.3.2.2 Condition Assessment 4.1.4.1 Creation	Calling out specific manufacturer failing product.	Capex	Other	Defective equipment does not need to be identified to the public. Nor does the specific failures of the defective equipment need to be made public.	Making public information related to failure of specific manufacturer products can jeopardise both the manufacturer's reputation and future earning capability. And may impact Jemena's relationship with those manufacturers leading to problems procuring in the future.	No public benefit in releasing information that relates to identifiable manufacturer equipment that becomes defective.



Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
Measurement Asset Class Strategy 4.1.4.3 Asset Replacement/disposal Table 4-8 Table 4-9	Listing replacement approach for specific equipment manufacturers	Capex	Strategic Information	The release of this information could adversely impact JGN's ability to negotiate a fair market price for these items.	If manufacturers can see the replacement strategy for their competitors' products, this could interfere with market competition.	Release of this information could inhibit JGN's ability to secure a competitive price when it next goes to tender.
Measurement Asset Class Strategy 4.2.1 Introduction (Water Measurement)	Listing replacement approach for specific equipment manufacturers	Capex	Strategic Information	The release of this information could adversely impact JGN's ability to negotiate a fair market price for these items.	If manufacturers can see the replacement strategy for their competitors' products, this could interfere with market competition.	Release of this information could inhibit JGN's ability to secure a competitive price when it next goes to tender.
Measurement Asset Class Strategy 4.2.3.1 Life Expectancy 4.2.3.2.2 Condition Assessment Table 4-13	Calling out specific manufacturer failing product.	Capex	Other	Defective equipment does not need to be identified to the public. Nor does the specific failures of the defective equipment need to be made public.	Making public information related to failure of specific manufacturer products can jeopardise both the manufacturer's reputation and future earning capability. And may impact JGN's relationship with those manufacturers leading to problems procuring in the future.	No public benefit in releasing information that relates to identifiable manufacturer equipment that becomes defective.
Measurement Asset Class Strategy 4.3.2.3 Current Risks	Highlighting risks with single supplier	Capex	Strategic Information	The release of this information could adversely impact JGN's ability to negotiate a fair market price for these items.	Publishing details of JGN's procurement strategy could adversely impact its ability to negotiate a fair market price for these items.	Release of this information could inhibit JGN's ability to secure a competitive price when it next goes to tender.
Measurement Asset Class Strategy 4.3.3.2.1 Age Profile	Naming single supplier	Capex	Strategic Information	The release of this information could adversely impact JGN's ability to negotiate a fair market price for these items.	If other manufacturers can see the sole supplier of specific equipment, this could interfere with market competition.	Release of this information could inhibit JGN's ability to secure a competitive price when it next goes to tender.
Measurement Asset Class Strategy 4.3.3.2.1 Age Profile Table 4-25 Table 4-26 4.2.4.3 Asset Replacement / disposal Table 4-14	Listing age and replacement approach for specific equipment manufacturers	Capex	Strategic Information	The release of this information could adversely impact JGN's ability to negotiate a fair market price for these items.	If manufacturers can see the replacement strategy for their competitors' products, this could interfere with market competition.	Release of this information could inhibit JGN's ability to secure a competitive price when it next goes to tender.
<b>JGN-2-3.15.2-Connections capex forecast model-20190630-confidential</b>						
Entire model.	Connections capex – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>JGN-2-3.15-2-Meter replacement capex forecast model-20190630-confidential</b>						
Entire model	Meter replacement capex – Volumes and unit rates	Capex	Market sensitive cost inputs	This information contains underlying (contractor) labour and material costs which, if published, could affect JGN's (and third-party service providers') ability to	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
				obtain competitive prices in future procurement processes.	therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	publishing this information, as opposed to using it on a confidential basis.
<b>JGN-2-3.15-2-Meter replacement volume forecast model-20190630-confidential</b>						
Entire model	Meter replacement volumes by types	Capex	Market sensitive cost inputs	Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to JGN's outsourcing arrangements (including structure and activity) are commercially confidential to JGN and could harm JGN's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>JGN-2-3.15-2-Capacity Augmentation Development Plan-NPV Model (1) -50 years-20190630-confidential</b>						
Tab "Input Assumptions" – Unit Rates	Capex – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm JGN's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any public benefit that would arise from publicly disclosing this information.
<b>JGN-2-3.15-2-Capacity Augmentation Development Plan-NPV Model (2) -70 years-20190630-confidential</b>						
Tab "Input Assumptions" – Unit Rates	Capex – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm JGN's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any public benefit that would arise from publicly disclosing this information.
<b>JGN-2-3.15-1-SPM corrosion failure due to CP shielding-OA-20190624-confidential</b>						
Sydney Primary Main Integrity Management (Corrosion Failure due to CP shielding) 2.6 Strategy	Information to determine network operator	Capex	Other	Information relates to another network operator and does not relate to JGN's network.	Information relates to another network operator and does not relate to JGN's network.	JGN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
<b>JGN-2-3.15-2-Connection and metering forecasting methodology-20190630-confidential</b>						
Page 3 Figure 1-1 Page 5 Figure 1-2, 1-3 Page 6 Figure 1-4 Page 10, Tables 2-1, 2-2, 2-3. Page 11, Tables 2-4, 2-5 Page 13 – Tables 2-12, 2-13, 2-14, 2-15, 2-16, 2-17 Page 14, Tables 2-18, 2-19, 2-20	Unit rates, contractor price changes (and information that can be used to derive this material)	Connections capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any public benefit that would arise from publicly disclosing this information.

Title page and paragraph number of document containing the confidential information	Description of the confidential information	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Confidentiality category	Reason why the information falls into the selected category. If information is "other", further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidentiality information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
Page 18, Tables 2-30 Page 19, Tables 2-31 Page 20 – Tables 2-32, 2-33, 2-34, 2-35 Page 21, Tables 2-38, 2-39 Page 23, Tables 2-45, 2-47						
<b>E.B-1.1(a)-1-JGN-RIN Reconciliation model - Part A-20190630-Confidential</b>						
<ul style="list-style-type: none"> <li>o Whole model</li> </ul>	Capex – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect JGN's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm JGN's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any public benefit that would arise from publicly disclosing this information.
<b>Attachment E.B-1.4-1-JGN-RIN Reconciliation model - Part B-20190630-Confidential</b>						
Whole model	JGN's model to reconcile regulatory models to RIN	Rate of return information	Market sensitive cost information and Other	The model is designed to help the AER by providing a reconciliation between information from various regulatory models and the RIN. It includes confidential information on JGN's averaging periods which are included in the RIN template F8. WACC inputs	There is no benefit of making this public as it only is a reconciliation tool to assist the AER in its review. The averaging periods included in RIN Template sheet "F8. WACC inputs" is sensitive information and cannot be made public.	Disclosure of averaging period could increase cost of refinancing for JGN and increase costs to customers. JGN is not aware of any public benefit from publicly disclosing this information.

## 2. Proportion of confidential information

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Written response	3	70	73	4%	96%
Basis of preparation	1	105	106	1%	99%
Regulatory templates	23	32	55	42%	58%
Other Attachments	2297	2751	5048	46%	54%