

# Jemena Electricity Networks (Vic) Ltd

## JEN response to Electricity Distribution Price Review Regulatory Information Notice

REG-JEN 034

Confidentiality claims

Public

30 April 2015



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## 1. CONFIDENTIALITY CLAIMS

The Australian Energy Regulator (**AER**) served Jemena Electricity Network (**JEN**) a final electricity distribution price review regulatory information notice (**EDPR RIN**) on 30 January 2015. Section 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 sets out specific sections of JEN's 2015 EDPR RIN response that JEN claims to be commercial-in-confidence and the basis of the claim. JEN's confidentiality claims for the JEN's EDPR proposal are separately listed at appendix 1.1 to the EDPR proposal.

JEN has applied the rationale for claiming information as commercial-in-confidence as set out in the AER's confidentiality guideline.

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.

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.

JEN has marked confidential information in spreadsheets by formatting the cells as [c-i-c] or using the AER built-in macro to highlight cells in red.

**Table 1–1: JEN EDPR RIN response 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  |
|--|---|---|------------------------------|--|---|--|
| <b>Response to section 1 of Schedule 1 to the RIN</b>  |   |   |                              |  |   |  |
| Regulatory templates - basis of preparation<br><br>As marked against Table 7.5.1.2, (column 5, pp. 49-50)  | Disclosure of profit margins and fees (per cent and/ dollar amount)           | Margins and prices for services               | Market sensitive cost inputs | The information relates to JEN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JEN seeks to procure such services in the future. Disclosure could therefore harm JEN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers. | Public disclosure of this information may prejudice future tender processes between JEN and its service providers, as well as commercial negotiations between JEN's related parties and their unrelated customers. 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 JEN). | 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. |
| <b>RIN templates (section 1 supporting documents), including files: REG-JEN 019 - Estimated – Historical/Forecast – Locked – confidential', 'REG-JEN 020 - Consolidated – Historical/Forecast – Locked – confidential'</b> |   |   |                              |  |   |  |
| Template 2.2— Repex, Table 2.2.1, Cells E11:J145   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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   |

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|--|---|---|------------------------------|--|---|--|
|  |   |   |                              | 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.  |
| <p>Template 2.3— Augex,<br/>Table 2.3.1,<br/>Cells O13:O19, Q13:Q19, S13:S19, V13:V19, Y13:Y19</p> <p>Table 2.3.2,<br/>Cells K74:K75, N74:N75, Q74:Q75, T74:T75, W74:W75</p> <p>Table 2.3.3.2,<br/>Cells E152:J153, E155:J156, E158:J160</p> <p>Table 2.3.4,<br/>Cells E174:J174</p> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |

## 1 — CONFIDENTIALITY CLAIMS

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| <p>Template 2.3— Augex,<br/>Table 2.3.1<br/>Cells AA13:AB19</p> <p>Table 2.3.2<br/>Cells Y74:Z75</p> | The margin paid to JEN's related parties    | Margin  | Market sensitive cost inputs | Revealing the margin 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. 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 JEN). Totals are also confidential to ensure margin cannot be derived. | The details relating to JEN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JEN and could harm JEN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JEN and its service providers, as well as commercial negotiations between JEN's related parties and their unrelated 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>Template 2.4—Augex Model,<br/>Table 2.4.1,<br/>Cells I13:J14,N13:O14,<br/>R13:R14</p>             | Customer maximum demand and growth rate     | Maximum demand / growth rate                  | Personal Information         | This information relates to a customer whose identity is apparent or can reasonably be ascertained from the information.  | Revealing demand levels or growth rates of individual customers would reveal customers private information.   | 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.  |
| Template 2.4—Augex Model, Table 2.4.2, Cells H1282:I1282, M1282:N1282, Q1282 | Customer maximum demand and growth rate     | Maximum demand / growth rate                  | Personal Information     | This information relates to a customer whose identity is apparent or can reasonably be ascertained from the information. | Revealing demand levels or growth rates of individual customers would reveal customers private information. | 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. |
| Template 2.4—Augex Model, Table 2.4.3 Cells I6726:J6726, Q6726:R6726, X6726  | Customer maximum demand and growth rate     | Maximum demand / growth rate                  | Personal Information     | This information relates to a customer whose identity is apparent or can reasonably be ascertained from the information. | Revealing demand levels or growth rates of individual customers would reveal customers private information. | 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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| <p>Template 2.4—Augex Model,<br/>Table 2.4.6,<br/>Cells D7853:S7863,<br/>T7857:AA7858,<br/>T7861:AA7862</p>  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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>Template 2.5—Connections,<br/>Table 2.5.1,<br/>Cells:<br/>F14:K15, F22:K28<br/>F30:K31, F33:K33<br/>F35:K36, F39:K40<br/>F42:K42, F44:K47</p> <p>Table 2.5.2<br/>Cells F67:K67,<br/>F70:K76</p> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |



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|---|--|---|-------------------------------------|---|--|---|
| <p>Template 2.6—Non-Network<br/>Table 2.6.1<br/>Cells F13:K14, F19:K28</p>                          | <p>Capital / Operating expenditure amounts by which unit rates can be derived, or unit rates</p> | <p>Capex / Opex – unit rates</p>              | <p>Market sensitive cost inputs</p> | <p>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.</p> | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.</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>Template 2.11—Labour,<br/>Table 2.11.1<br/>Cells L12:Q12, L33:Q33, L36:Q36, L51:Q51, L57:Q57</p> | <p>Unit rates</p>  | <p>Labour rates</p>                           | <p>Personal Information</p>         | <p>This information relates to three or less employees whose labour rate is apparent or can reasonably be ascertained from the information.</p>   | <p>Revealing labour rates of individual employees would reveal private information.</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>Template 2.12—Input Tables,<br/>Cells Q31:AB76</p>   | <p>Capital / Operating expenditure amounts by which unit rates can be</p>                        | <p>Capex / Opex – unit rates</p>              | <p>Market sensitive cost inputs</p> | <p>This information contains underlying internal (and contractor) labour costs which, if published, could</p>   | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the</p>   | <p>While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit</p>   |

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|--|---|---|------------------------------|--|---|--|
|  | derived, or unit rates  |   |                              | 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.  |
| Template 4.1—<br>Public Lighting, Table 4.1.2<br>Cells F18:K18,<br>F21:K21 | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Template 4.1—Public Lighting, Table 4.1.3<br>Cells F76:K80,<br>F116:K142   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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            | 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 arrangements  |

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|---|---|---|------------------------------|--|---|--|
|   |   |   |                              | processes.   | business interests and, ultimately, increase costs passed onto customers.   | can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.   |
| Template 4.2— Metering, Table 4.2.2 Cells O12:T45         | Metering expenditure amounts by which unit rates can be derived, or unit rates  | Metering capex – 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. |
| Template 4.3—Fee-based services Table 4.3.1 Cells E11:J26 | Fee-based expenditure amounts by which unit rates can be derived, or unit rates | Fee-based expenditure – 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.   |
| Template 4.3—<br>Quoted services,<br>Table 4.3.2<br>Cells E12:J23  | Quoted services expenditure amounts by which unit rates can be derived, or unit rates | Quoted services expenditure – 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. |
| Template 5.4—MD and utilisation—Spatial<br>Table 5.4.1,<br>Cells:<br>H44:M55<br>H1119:M1140<br>H1527:M1536<br>H1549:M1558<br>H1835:M1844 | Customer demand   | Customer demand                               | Personal Information                      | This information relates to a customer whose identity is apparent or can reasonably be ascertained from the information.   | Revealing demand levels of individual customers would reveal customers private information.   | 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. |
| Template 2.11—<br>Labour<br>Cells: L12:Q12,  | Labour expenditure information for employee   | Labour opex                                   | Personal information and market sensitive | Labour classifications with three or less Average Staffing Levels (ASLs) are   | Detriment would be caused by breaching privacy laws in  | While the detriment of publishing the information is clear, JEN is not aware of any  |

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|--|---|---|------------------------------|---|---|--|
| L33:Q33, L36:Q36, L51:Q51, L57:Q57   | categories with three or less employees     |   | cost impacts                 | commercial in confidence, as the employees' salaries within these bands could be identified. Salary information is 'personal information'.<br>Furthermore it is also market sensitive information as this could be used by competing firms to target JEN employees for recruitment. | circumstances where personal information is published that can identify an employee. Disclosure could also harm JGN's legitimate business interests by making it more difficult to retain qualified staff.      | 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.   |
| Template 7.4—<br>Shared assets<br>Cells: E10:U12   | Shared assets unregulated revenue           | Unregulated revenue                           | Market sensitive cost inputs | Information contains the revenues in the unregulated business of JEN.   | Disclosing the information would provide an opportunity for competitors in the unregulated business of JEN to obtain advantage by providing information to the market that is otherwise not publicly available. | While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| <b>Backcast RIN templates (section 1 supporting documents), including files: 'REG-JEN 024 - Actual - Backcast – Locked – confidential'</b> |   |   |                              |   |   |  |
| Template 2.12 'Input tables'   | The margin paid to JEN's related            | Margin  | Market sensitive cost inputs | Revealing the margin could set a floor in the market  | The details relating to JEN's outsourcing   | While the detriment of publishing the information is   |

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|--|---|---|------------------------------|--|---|---|
| Cells AI52:AN52  | parties                                     |   |                              | when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers. 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 JEN). Totals are also confidential to ensure margin cannot be derived. | arrangements (including structure and activity scope) are commercially confidential to JEN and could harm JEN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JEN and its service providers, as well as commercial negotiations between JEN's related parties and their unrelated 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. |
| <b>RIN template supporting document (section 1 supporting documents): ' REG-JEN 037 - Estimated - Historical/Forecast - Unlocked – confidential'</b> |   |   |                              |  |   |   |
| "2.12 Input Tables" sheet<br>Cells: E4:P5,<br>E26:P71  | Direct material and labour expenditure      | Opex and capex                                | 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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|--|---|---|---|---|--|---|
| <b>Response to section 4 of Schedule 1 to the RIN</b>              |   |   |   |   |  |   |
| Response to 4.4<br>Cell D98:199,<br>'Schedule 1<br>response' sheet | 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 has a direct relationship on the security of the network and the price paid for insurance coverage.</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"> <li>• JEN's ability to negotiate price and coverage terms with insurers deteriorates</li> <li>• JEN's competitors for this type of insurance could gain competitive advantage in a new and small market</li> <li>• security of the network is put at risk or breached—the information pinpoints the areas JEN identifies as its largest exposure or commercial vulnerability</li> </ul> |

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| <b>Response to section 5.2b of Schedule 1 to the RIN (folder 'Schedule 1 – Section 5.2b – Capital Expenditure)</b>      |   |   |                              |   |   |  |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure/Business cases'<br>All documents in folder     | JEN's internal business cases   | Capex   | Market sensitive cost inputs | The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between 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 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. | 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. |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure/ Asset Class Strategies'<br>JEN PL 0005 - iNet | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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       | 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 arrangements  |



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|---|---|---|------------------------------|--|---|--|
| Radio & 3G Communications Systems<br>• Paragraph 4, 1st bullet point (p 16)   |   |   |                              | processes.   | business interests and, ultimately, increase costs passed onto customers.   | can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.   |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0006 - Multiplexers & Voice Frequency Equipment asset class strategy<br>• Paragraph 4, 1st bullet (p 15) | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0007 - Remote Terminal Unit Asset Class  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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                        | 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   |

## 1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document   | Description of the confidential information                                   | Topic the confidential information relates to | Confidentiality category     | Why the confidential information falls into the selected category  | How and why detriment would be caused from disclosing the confidential information  | Reasons supporting why the identified detriment is not outweighed by the public benefit  |
|--|---|---|------------------------------|--|---|--|
| Strategy ,<br>• Paragraph 4, 1st bullet (p 14)   |   |   |                              |  | passed onto customers.  | the relevant interested parties involved in regulatory processes.  |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure/ Asset Class Strategies'<br>JEN PL 0009 - Communications network devices<br>• Table OV-2, entire table (p viii)<br>• 1st paragraph, cost information (2 instances) (p 10)<br>• Table 7-2, entire table (p 17)<br>• Section 5.2 Asset Class Criticality, 2 <sup>nd</sup> paragraph, 1st bullet point (p 14) | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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   |

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|--|--|---|-------------------------------------|---|--|---|
| <p>JEN PL 0010 - GPS Clocks Asset Class Strategy,</p> <ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Section 5.2 Asset Class Criticality, 2nd paragraph, 1st bullet point (p 13)</li> <li>• Table 7-2, entire table (p 16)</li> </ul>  |  |   |                                     | <p>obtain competitive prices in future procurement processes.</p>   | <p>Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.</p>  | <p>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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0021 - Zone Substation Protection &amp; Control Equipment Asset Class Strategy,</p> <ul style="list-style-type: none"> <li>• Table OV-1, entire table (p viii)</li> <li>• Table 7-1, entire table (p 33)</li> <li>• Appendix C1, 5th paragraph, (3 instances) (p C-1)</li> </ul> | <p>Capital expenditure amounts by which unit rates can be derived, or unit rates</p> | <p>Capex – unit rates</p>                     | <p>Market sensitive cost inputs</p> | <p>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.</p> | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.</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> |

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|--|---|---|------------------------------|--|---|--|
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0022 - PQM System Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Paragraph 1, 3rd bullet, cost information (p 13)</li> <li>• Table 7-2, entire table (p 22)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0023 - Zone Substation DC Supply System Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Table 7-2, entire</li> </ul>  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |

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|--|---|---|------------------------------|--|---|--|
| table (p 36)   |   |   |                              |  |   |  |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0024 - Poles Asset Class Strategy,<br>• Table OV-2, entire table (p viii)<br>• Paragraph 4, 2nd bullet (p ix)<br>• 3rd bullet (p 3)<br>• Paragraph 7, (p 25) (2 instances)<br>• 1st bullet (p 26)<br>• Paragraph 4, 2nd bullet (p 42)<br>• Table 7-2, entire table (p 41) | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0025 - Pole Top Structures Asset  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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            | 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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|---|---|---|------------------------------|--|---|--|
| Class Strategy,<br>• Table OV-2, entire table (p viii)<br>• Table 7-2, entire table (pp 25-26)  |   |   |                              | processes.   | ultimately, increase costs passed onto customers.   | access to the information for the relevant interested parties involved in regulatory processes.  |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0026 - Conductors and connectors<br>Asset Class Strategy<br>• Table OV-2, entire table (p viii)<br>• Table 7-2, entire table (p 21) | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0027 - Overhead Line Switchgear Asset   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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                        | 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   |

| 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  |
|--|---|---|------------------------------|--|---|--|
| Class Strategy,<br>• Table OV-2, entire table (p vii)<br>• Table 7-2, entire table (p 27)  |   |   |                              |  | passed onto customers.  | the relevant interested parties involved in regulatory processes.  |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0028 - Automatic Circuit Recloser Asset Class Strategy,<br>• Table OV-2, entire table (p vii)<br>• Table 7-2, entire table (p 17) | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0029 - Public Lighting Asset Class Strategy<br>• Table OV-2, entire   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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                        | 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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|---|---|---|------------------------------|--|---|--|
| <p>table (p vii)</p> <ul style="list-style-type: none"> <li>Table 7-2, entire table (p 21)</li> </ul>   |   |   |                              |  | passed onto customers.  | involved in regulatory processes.  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0030 - High Voltage Outdoor Overhead Fuse Asset Class Strategy</p> <ul style="list-style-type: none"> <li>Table OV-2, entire table (p vii)</li> <li>Table 7-2, entire table (p 16)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0031 - Distribution Surge Arresters Asset Class Strategy</p> <ul style="list-style-type: none"> <li>Table OV-2, entire</li> </ul>   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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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|---|---|---|------------------------------|--|---|--|
| <p>table (p vii)</p> <ul style="list-style-type: none"> <li>Table 7-2, entire table (p 20)</li> </ul>   |   |   |                              |  |   | processes.   |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0032 - Pole Type Transformers Asset Class Strategy</p> <ul style="list-style-type: none"> <li>Table OV-2, entire table (p vii)</li> <li>Table 7-2, entire table (p 20)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0033 - Non Pole Type Distribution Substations Asset Class Strategy</p>  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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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|---|---|---|------------------------------|--|---|--|
| <ul style="list-style-type: none"> <li>Table OV-2, entire table (p vii)</li> <li>Table 7-2, entire table (p 24)</li> </ul>  |   |   |                              |  |   | processes.   |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0034 - Earthing Systems Asset Class Strategy<br><ul style="list-style-type: none"> <li>Table OV-2, entire table (p viii)</li> <li>Table 7-2, entire table (p 16)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0035 - Underground Distribution Systems Asset Class Strategy  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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                        | 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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|---|--|--|------------------------------|--|---|--|
| <ul style="list-style-type: none"> <li>Table OV-2, entire table (p vii)</li> <li>Table 7-2, entire table (p 22)</li> </ul>  |  |  |                              |  | passed onto customers.  | involved in regulatory processes.  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0036 - Low Voltage Overhead Services Asset Class Strategy</p> <ul style="list-style-type: none"> <li>Table OV-2, entire table (p viii)</li> <li>Table 7-2, entire table (p 17)</li> </ul> | <p>Capital expenditure amounts by which unit rates can be derived, or unit rates</p>   | Capex – 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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0037 - Grounds/Domestic Management of Zone &amp; Non-Pole Type Substations Asset</p>  | <p>Capital expenditure amounts by which unit rates can be derived, or unit rates</p> <p>Cost of monitoring and maintenance of Zone substations</p> | <p>Capex – unit rates</p> <p>Capex – cost to build new zone substation</p> <p>Opex – cost of maintenance for zone substation</p> | 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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|---|---|---|------------------------------|--|---|--|
| <p>Class Strategy,</p> <ul style="list-style-type: none"> <li>• Paragraph 3, (p vi) (2 instances)</li> <li>• Table OV-2, entire table (p vii)</li> <li>• Table 7-2, entire table (p 19)</li> </ul>  |   |   |                              |  |   | processes.   |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0038 - Zone Substation Capacitor Banks Asset Class Strategy,</p> <ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Table 7-2, entire table (p 16)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'</p> <p>JEN PL 0039 - Zone Substation Circuit</p>  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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            | 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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|--|---|---|------------------------------|--|---|--|
| Breakers Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Table 7-2, entire table (p 28)</li> </ul>   |   |   |                              | processes.   | ultimately, increase costs passed onto customers.   | access to the information for the relevant interested parties involved in regulatory processes.  |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0041 - Zone Substation Disconnectors & Buses Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Table 7-2, entire table (p 24)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation<br>Sub-folder:<br>'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0042 - Zone  | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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                               | 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   | 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.   |

## 1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document   | Description of the confidential information                                   | Topic the confidential information relates to | Confidentiality category     | Why the confidential information falls into the selected category  | How and why detriment would be caused from disclosing the confidential information  | Reasons supporting why the identified detriment is not outweighed by the public benefit  |
|--|---|---|------------------------------|--|---|--|
| Substation Transformers Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Paragraph 3 (p vii)</li> <li>• Table OV-2, entire table (p viii)</li> <li>• Paragraph, first bullet (p 11)</li> <li>• Paragraph 4, 1<sup>st</sup> bullet (p 15)</li> <li>• Table 7-2, entire table (p 25)</li> </ul>     |   |   |                              | future procurement processes.  | harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.   | Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.  |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0043 - Zone Substation Instrument Transformer Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Table OV-2, entire table (p vii)</li> <li>• Table 7-2, entire table (p 17)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |
| Supporting documentation   | Capital expenditure amounts by which  | Capex – unit rates                            | Market sensitive cost inputs | 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  |
|--|---|---|------------------------------|--|---|--|
| Sub-folder: 'Replacement Capital Expenditure / Asset Class Strategies'<br>JEN PL 0045 - Electricity Metering and Associated Communication Assets Asset Class Strategy,<br><ul style="list-style-type: none"> <li>• Table OV-2, entire table (p ix)</li> <li>• Table 7-2, entire table (p 37)</li> </ul>      | unit rates can be derived, or unit rates                                      |   |                              | 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.  |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'<br>ELE PL 0010- Non Preferred Service Replacement Strategic Planning Paper,<br><ul style="list-style-type: none"> <li>• Paper Summary, 1<sup>st</sup> bullet point, cost information (p iv)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |

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|---|---|---|------------------------------|--|---|--|
| <ul style="list-style-type: none"> <li>Table 3-2, all cost information (p 12)</li> <li>Paragraph 1, (p 16)</li> <li>Table 5-1, all cost information (p 16)</li> </ul>   |   |   |                              |  |   |  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0011 - Pole Replacement and Reinforcement Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>Paper Summary, 2<sup>nd</sup> and 3<sup>rd</sup> bullet, (p v)</li> <li>Table OV-1.1, all costs information (p vii)</li> <li>Paragraph 5, (p 17)</li> <li>Table 4-1, all cost information (p 18)</li> <li>Table 6-1, all cost information (p 21)</li> <li>Appendix C1, (p C-1)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |



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|--|--|---|-------------------------------------|---|--|---|
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0012 - Pole Top Structure Replacement Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paper Summary, 2<sup>nd</sup> bullet (p v);</li> <li>• Table OV-1-1, all costs information (p vi)</li> <li>• Table 4-1, all cost information (p 15)</li> <li>• Table 6-1, all cost information (p 18)</li> <li>• Appendix B1, (p B-1)</li> </ul> | <p>Capital expenditure amounts by which unit rates can be derived, or unit rates</p> | <p>Capex – unit rates</p>                     | <p>Market sensitive cost inputs</p> | <p>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.</p> | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.</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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning</p>   | <p>Opex value</p>  | <p>Opex – unit rates</p>                      | <p>Market sensitive cost inputs</p> | <p>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</p>                               | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore</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.</p>   |

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|---|--|---|------------------------------|---|--|--|
| <p>Papers'</p> <p>ELE PL 0013 - Public Lighting Switch Wire Removal Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paper summary, 2<sup>nd</sup> bullet (p iv)</li> <li>• Paragraph 2, 2<sup>nd</sup> bullet (p iv)</li> <li>• Paragraph 3 &amp; Table 3-3 (p 7)</li> </ul> |  |   |                              | future procurement processes.   | harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.  | Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0013 - Public Lighting Switch Wire Removal Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paragraph 3 (p 6)</li> </ul>                           | Discount rate or variables by which discount rate can be derived | Rate of return                                | Market sensitive cost inputs | This information contains underlying cost of finance. If published, could affect JEN's ability to obtain competitive prices for external funding.                   | Revealing cost of finance could set a floor in the market when sourcing external funding. 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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure /</p>   | Capex value  | Capex – 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   |
|--|---|---|-------------------------------------|---|--|---|
| <p>Strategic Planning Papers’<br/>ELE PL 0014 - LV Mains Removal in the HBRA Strategic Planning Paper</p> <ul style="list-style-type: none"> <li>• Paper summary, 2<sup>nd</sup> bullet (p iv) (2 instances)</li> <li>• Paragraph 6, 2<sup>nd</sup> bullet (p 7)</li> <li>• Paragraph 1, (2 instances) (p 10)</li> <li>• Table 5-1 (p 10)</li> </ul> |   |   |                                     | <p>obtain competitive prices in future procurement processes.</p>   | <p>Disclosure could therefore harm JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.</p>  | <p>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>Supporting documentation<br/>Sub-folder: ‘Replacement Capital Expenditure / Strategic Planning Papers’<br/>ELE PL 0015 - Pole Top Fire Mitigation Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paper summary, 2<sup>nd</sup> bullet (2 instances) (p v);</li> <li>• Paragraph 4 (p 3)</li> </ul>                        | <p>Capex value</p>                          | <p>Capex – unit rates</p>                     | <p>Market sensitive cost inputs</p> | <p>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.</p> | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.</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> |

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|---|--|---|------------------------------|---|--|--|
| <p>(2 instances)</p> <ul style="list-style-type: none"> <li>• Table 3-1 (p 14);</li> <li>• Paragraphs 1 &amp; 2 (p 18)</li> <li>• Table 3-2 (p 18)</li> <li>• Paragraph 1 (p 19)</li> <li>• Paragraph 1 &amp; table at end of section, all cost information (p 23)</li> <li>• Appendix D1 entire worksheet (p D-1)</li> </ul> |  |   |                              |   |  |  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0015 - Pole Top Fire Mitigation Strategic Planning Paper (),</p> <ul style="list-style-type: none"> <li>• Paragraph 1 (p 13)</li> </ul>  | Discount rate or variables by which discount rate can be derived | Rate of return                                | Market sensitive cost inputs | This information contains underlying cost of finance. If published, could affect JEN's ability to obtain competitive prices for external funding. | Revealing cost of finance could set a floor in the market when sourcing external funding. 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>Supporting documentation</p> <p>Sub-folder:</p>  | Capital expenditure amounts by which unit rates can be           | Capex – 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   |
|---|--|---|-------------------------------------|---|--|---|
| <p>'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0018 - High Voltage Installation Replacement Program Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paper Summary, 3<sup>rd</sup> bullet (p iv)</li> <li>• Paragraph 1, 3<sup>rd</sup> bullet (p iv)</li> <li>• Paragraph 1, (p 8)</li> <li>• Paragraph 1, (p 9)</li> <li>• Paragraph 1, (p 10)</li> <li>• Table 3.1, all cost information (p 11)</li> <li>• Table 3.2, all cost information (p 11)</li> </ul> | <p>derived, or unit rates</p>  |   |                                     | <p>which, if published, could affect JEN's (and third party service providers') ability to obtain competitive prices in future procurement processes.</p>   | <p>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.</p>                            | <p>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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure /Strategic Planning Papers'</p> <p>ELE PL 0021 - Adopting Fault</p>   | <p>Capital expenditure amounts by which unit rates can be derived, or unit rates</p> | <p>Capex – unit rates</p>                     | <p>Market sensitive cost inputs</p> | <p>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.</p> | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and,</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</p>             |

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|--|---|---|------------------------------|--|---|--|
| <p>Current Limiter technology to reduce risk of bushfire ignition Strategic Planning Paper</p> <ul style="list-style-type: none"> <li>• Costs in table p v</li> <li>• Paragraph 4, p 12</li> <li>• Costs in table p 18</li> <li>• Table 9-1 p 25</li> <li>• Costs in table p 26</li> </ul> |   |   |                              |  | ultimately, increase costs passed onto customers.   | access to the information for the relevant interested parties involved in regulatory processes.  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0022 - Power Quality Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Table column 2, rows 4 and 6 (pp. vi, vii),</li> </ul>              | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning</p>   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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   |
|---|---|---|-------------------------------------|--|---|---|
| <p>Papers’<br/>ELE PL 0023 - Power Factor Improvement Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paragraph 3, 3<sup>rd</sup> bullet (p iv)</li> <li>• Table 3-2 (pp. 7-8)</li> <li>• Table 3-4 (pp. 8-9)</li> <li>• Table 3-5 (pp. 9-10)</li> <li>• Paragraph 1 (p 10)</li> <li>• Paragraph 1 (p 11)</li> <li>• Paragraph 1, 2<sup>nd</sup> bullet</li> <li>• Paragraph 2 (2 instances) (p 13)</li> <li>• Appendix C1, Cost information in table (p C-1)</li> </ul> |   |   |                                     | <p>obtain competitive prices in future procurement processes.</p>  | <p>Disclosure could therefore harm JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.</p>   | <p>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>Supporting documentation<br/>Sub-folder: ‘Replacement Capital Expenditure / Strategic Planning Papers’<br/>ELE PL 0032 - AMI Benefits Realisation Outage Management</p>  | <p>Discount rate or variables by which discount rate can be derived</p> | <p>Rate of return</p>                         | <p>Market sensitive cost inputs</p> | <p>This information contains underlying cost of finance. If published, could affect JEN’s ability to obtain competitive prices for external funding.</p> | <p>Revealing cost of finance could set a floor in the market when sourcing external funding. Disclosure could therefore harm JEN’s legitimate business interests and, ultimately, increase costs passed onto customers.</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</p> |

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|--|---|---|------------------------------|--|---|--|
| Strategic Planning Paper,<br><ul style="list-style-type: none"> <li>• Paragraph 1 (p vi);</li> <li>• Final paragraph (p 22)</li> <li>• Table 7-1, last row (p 22)</li> </ul>   |   |   |                              |  |   | the relevant interested parties involved in regulatory processes.  |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'<br>ELE PL 0032 - AMI Benefits Realisation Outage Management Strategic Planning Paper,<br><ul style="list-style-type: none"> <li>• Table 5-1, Capex and Opex columns (p 13)</li> <li>• Table 5-2, capex column (p 14)</li> <li>• Table 6-5, cost column (p 19)</li> <li>• Last 2 bullets (p 20)</li> <li>• 2<sup>nd</sup> paragraph (p 21)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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. |



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|---|---|---|------------------------------|--|---|---|
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0032 - AMI Benefits Realisation Outage Management Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Table 5-1, Opex columns (p 13)</li> <li>• Table 7-1, opex (p 22)</li> </ul> | IT capex/opex value   | Capex/opex                                    | Market sensitive cost inputs | The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between 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 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. | 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. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0033 -</p>   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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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| 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>Demand Management Innovation Allowance – Program and Projects Proposals Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Table OV-1, all costs information (p vi)</li> <li>• Paragraph 2, (p vii)</li> <li>• Implementation costs subsection, 1<sup>st</sup> paragraph, (p 23)</li> <li>• Implementation costs subsection, 1<sup>st</sup> paragraph, (p 26)</li> <li>• Implementation costs subsection, 1<sup>st</sup> paragraph, (p 29)</li> <li>• Implementation costs subsection, 1<sup>st</sup> paragraph, (p 31)</li> <li>• Implementation costs subsection, 1<sup>st</sup> paragraph, (p 34)</li> </ul> |   |   |                          |   | ultimately, increase costs passed onto customers.                                  | 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  |
|--|--|---|------------------------------|---|--|--|
| <ul style="list-style-type: none"> <li>• Table 3-1, all cost information (p 34)</li> <li>• Appendix A1, Total expenditure estimate, (p A-2)</li> <li>• Appendix A2, Total expenditure estimate, (p A-4)</li> <li>• Appendix A3, Total expenditure estimate, (p A-6)</li> <li>• Appendix A4, Total expenditure estimate, (p A-8)</li> <li>• Appendix A5, Total expenditure estimate, (p A-10)</li> <li>• Appendix A6, Total expenditure estimate, (p A-12)</li> </ul> |  |   |                              |   |  |  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0034 - AMI Benefits Realisation Supply Monitoring</p>   | Discount rate or variables by which discount rate can be derived | Rate of return                                | Market sensitive cost inputs | This information contains underlying cost of finance. If published, could affect JEN's ability to obtain competitive prices for external funding. | Revealing cost of finance could set a floor in the market when sourcing external funding. 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 |

## 1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document   | Description of the confidential information                                   | Topic the confidential information relates to | Confidentiality category     | Why the confidential information falls into the selected category  | How and why detriment would be caused from disclosing the confidential information  | Reasons supporting why the identified detriment is not outweighed by the public benefit  |
|--|---|---|------------------------------|--|---|--|
| <p>Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Overview, 2<sup>nd</sup> last paragraph (p vi)</li> <li>• Table 8-1, last row (p 32)</li> <li>• Table 8-2, last row (p 33)</li> <li>• Last paragraph (p 33)</li> </ul>   |   |   |                              |  |   | involved in regulatory processes.  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'</p> <p>ELE PL 0034 - AMI Benefits Realisation Supply Monitoring Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Table 6-1, Capex column (p 25)</li> <li>• Table 6-2, capex column (p 26)</li> <li>• Table 6-3, capex column (p 26)</li> <li>• Table 8-1, capex (p</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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   |
|---|---|---|------------------------------|---|---|---|
| 32)   |   |   |                              |   |   |   |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'<br>ELE PL 0034 - AMI Benefits Realisation Supply Monitoring Strategic Planning Paper,<br><ul style="list-style-type: none"> <li>• Paragraph 4 (p 3)</li> <li>• Table 8-1, opex (p 32)</li> <li>• Table 8-2, first row (p 33)</li> </ul> | IT capex/opex value   | Capex/opex                                    | Market sensitive cost inputs | The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between 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 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. | 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. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Supporting documentation<br>Sub-folder: 'Replacement Capital Expenditure / Strategic Planning Papers'<br>ELE PL 0052 - High   | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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       | 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 arrangements   |

## 1 — CONFIDENTIALITY CLAIMS

| Title, page and paragraph number of document   | Description of the confidential information                                   | Topic the confidential information relates to | Confidentiality category     | Why the confidential information falls into the selected category  | How and why detriment would be caused from disclosing the confidential information  | Reasons supporting why the identified detriment is not outweighed by the public benefit  |
|--|---|---|------------------------------|--|---|--|
| <p>Voltage Installation Replacement Program (Enclosed Switches) Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paper Summary, 2<sup>nd</sup> bullet (p 1)</li> <li>• Table 2.1 (p 3)</li> <li>• Paragraph 1 (p 7)</li> <li>• Tables 4-1, 4-2, (p 8)</li> <li>• Tables 4-3, 4-4, (p 9)</li> <li>• Table 4-5, (p 11)</li> </ul>  |   |   |                              | processes.   | business interests and, ultimately, increase costs passed onto customers.   | can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.   |
| <p>Supporting documentation<br/>Sub-folder: 'Replacement Capital Expenditure/ Strategic Planning Papers'<br/>ELE PL 0053 - High Voltage Installation Replacement Program (Overhead Switches) Strategic Planning Paper,</p> <ul style="list-style-type: none"> <li>• Paper Summary, 3<sup>rd</sup> bullet (p iv)</li> <li>• Table 2-2, (p 4)</li> </ul> | Capital expenditure amounts by which unit rates can be derived, or unit rates | Capex – 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  |
|---|---|---|------------------------------|---|---|--|
| <ul style="list-style-type: none"> <li>Paragraph 2 (p 10) (2 instances)</li> <li>Table 4-1 (p 10)</li> <li>Table 4-1 (p 10)</li> <li>Table 4-3 and 4-4, (p 11)</li> </ul> |   |   |                              |   |   |  |
| <p>Supporting documentation</p> <p>Sub-folder: 'Augmentation Capital Expenditure/Development Strategies'</p> <p>All documents in folder</p>                               | JEN's Network development strategies                | Capex   | Market sensitive cost inputs | The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between 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 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. | 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>Supporting documentation</p> <p>Sub-folder:</p>  | JEN's augmentation capex (augex) forecast model and | Capex   | Market sensitive cost inputs | The models contains unit rates and detailed augex program financial or strategy   | Public disclosure of the relevant capex information could undermine the   | JEN provides detailed augex information in its proposal and via its public RIN response.   |

## 1 — CONFIDENTIALITY CLAIMS

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|---|---|---|--------------------------|--|---|---|
| Augmentation Capital Expenditure/Supporting Documents<br>All excel documents in folder  | supporting excel files                      |   |                          | information. Publishing the material may prejudice future tender and commercial negotiation processes between JEN and its potential service providers.<br>The project totals could also be used in combination with a public version of the RIN response to determine margins. | 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. | JEN does not consider there would be any additional public benefit to disclosure of the information via the augex model.  |
| Supporting documentation<br>Sub-folder:<br>Augmentation Capital Expenditure/Supporting Documents<br>ELE PL 0038 'ACIL Allen JEN demand report 20112014'<br>Table 9 & Table 10, final column | Customer information                        | Demand  | Personal information     | The information relates to individual customer demand. 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 |



| 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 36.   |   |   |   |  |  | processes.   |
| Supporting documentation<br>Sub-folder: 'Connections expenditure requirements/Supporting documents'<br><ul style="list-style-type: none"> <li>ELE PR 0019 – customer connections capital forecast methodology<br/>Entire document</li> <li>ELE PR 0019A - JEN CIC Model – Sep 2015 (v20141007)<br/>Whole model</li> </ul> | Connections                                 | Capex for connections                         | Market sensitive cost inputs and personal information | The model and methodology contains unit rates and detailed connection program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between JEN and its potential service providers.<br><br>In addition, some information relates to individual customer whose identity is apparent or can reasonably be ascertained from the information. | 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.<br><br>In addition, revealing connection plans of individual customers would reveal customers private information. | 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. |
| Supporting documentation<br>Sub-folder: 'Non-   | JEN's internal business cases               | Capex   | Market sensitive cost inputs                          | The material contains detailed capex program financial or strategy   | Public disclosure of this information could undermine the request for  | While the detriment of publishing the information is clear, JEN is not aware of any  |

## 1 — CONFIDENTIALITY CLAIMS

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|---|---|---|------------------------------|---|---|--|
| network expenditure/Asset Management business case'<br>All documents in folder  |   |   |                              | information. Publishing the material may prejudice future tender and commercial negotiation processes between JEN and its potential service providers.  | 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. | 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.   |
| Supporting documentation<br>Sub-folder: 'Non-network expenditure/IT business cases and investment documents'<br>All documents in folder | JEN's internal business cases               | Capex   | Market sensitive cost inputs | The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between 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 has historically paid, or forecast to pay to establish the required capability. This could set a floor in the  | While the detriment of publishing the information is clear, 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   |
|--|--|---|-------------------------------------|---|--|---|
|  |  |   |                                     |   | 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>Supporting documentation<br/>Sub-folder: 'Non-network expenditure/Strategic planning<br/>ELE PL 0035 - Fleet Replacement and Rebuild Strategic Planning Paper</p> <ul style="list-style-type: none"> <li>• Table OV-1, all cost information, (p v)</li> <li>• Section 2.2.4 Variation in technical specifications, 1st paragraph, 1st bullet (p 4)</li> <li>• Table 3-2, all cost information (p 8)</li> <li>• Appendix A, B, C, D and E, entire</li> </ul> | <p>Capex amounts by which unit rates can be derived, or unit rates</p> | <p>Capex – unit rates</p>                     | <p>Market sensitive cost inputs</p> | <p>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.</p> | <p>Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.</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> |

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| 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   |
|---|---|---|--|---|--|---|
| tables  |   |   |  |   |  |   |
| <b>Response to section 10 of Schedule 1 to the RIN</b>  |   |   |  |   |  |   |
| <p>Response to 10.15<br/>Bushfire mitigation audits<br/>Supporting documents:</p> <ul style="list-style-type: none"> <li>• REG – JEN003</li> <li>• REG – JEN004</li> <li>• REG – JEN005</li> <li>• REG – JEN006</li> </ul> <p>Entire documents</p>              | Risk management                                   | Risk management                               | Information affecting the security of the network. | This information provides specific details on weaknesses on our network.  | Disclosure 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 aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.   |
| <b>Response to section 16 of Schedule 1 to the RIN</b>  |   |   |  |   |  |   |
| <p>Supporting document<br/>REG-JEN 031 – 'JEN EBT Allocation Model'<br/>Cell reference</p> <ul style="list-style-type: none"> <li>• P11:P16 (within "Input Replacement costs" sheet)</li> <li>• P22:P27 (within "Calc Allocation-Replacement" sheet)</li> </ul> | Estimated weighted average replacement unit costs | Unit replacement costs                        | Market sensitive cost inputs                       | This could reveal 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. | <p>Revealing replacement unit costs for procuring these particular asset classes could set a floor in the market when procuring such services in the future.</p> <p>Disclosure could therefore harm JEN's legitimate business interests and, ultimately, increase costs passed onto customers.</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.</p> <p>Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory</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   |
|--|---|---|------------------------------|---|---|---|
| Supporting document REG-JEN 031 – ‘JEN EBT Allocation Model’<br>Cell reference<br><ul style="list-style-type: none"> <li>P49:P54, I58:W63 (within ‘Calc Allocation- Replacement’ sheet)</li> </ul> | Depreciated replacement costs                                     | Unit replacement costs                        | Market sensitive cost inputs | The AER’s guidance to split the regulatory asset base into the prescribed asset classes within the RIN served to JEN, is to apply a depreciated replacement cost method, calculated as: <ul style="list-style-type: none"> <li>Replacement unit (A) x replacement costs (B) x remaining service life (C) / standard service life (D).</li> <li>The implied unit replacement costs (B) for various asset classes can be derived from re-engineering the prescribed formula.</li> </ul> | Revealing replacement unit costs for procuring these particular asset classes could set a floor in the market when procuring such services in the future.<br><br>Disclosure could therefore harm JEN’s legitimate business interests and, ultimately, increase costs passed onto customers. | processes.<br><br>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.<br><br>Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| <b>Response to section 18 of Schedule 1 to the RIN</b>   |   |   |                              |   |   |   |
| Supporting document REG-JEN 002—‘JAM ETU VIC Electricity Enterprise Agreement 2013’<br>Table under 1.13.4<br>P 75 & 155  | Employees private information under the Enterprise Agreement 2013 | Labour escalators                             | Personal information         | The information relates to individual employees personal information  | JEN considers that publishing the information would reveal employees private information.   | 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.  |

## 1 — CONFIDENTIALITY CLAIMS

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|--|---|---|------------------------------|--|--|--|
| Cells G15:G17, G20 of Appendix 'D'. Response to cl 18.2(c)' sheet  | JEN vendor price information  | Comparing historical escalators to realised price changes                 | Market sensitive cost inputs | Information relates directly to JEN's procured prices from vendors.  | JEN's ability to obtain competitive prices in future tender processes would deteriorate if the information was in the public domain.   | JEN's customers would be disadvantaged by facing higher long-term costs should JEN's tendering position deteriorate.   |
| <b>Response to section 19 of Schedule 1 to the RIN</b>   |   |   |                              |  |  |  |
| Cells D1115:I1140, of 'Schedule 1 response' sheet<br>Within text and in table<br>Cells C8:D9, D13:H14, C16:D18, C23:D23, D27:I28, C30:D30 of 'E. Update to Reset RIN Template' sheet | JEN's rationale for changes to JAM's service delivery and Terms of the Field Services Agreement (FSA) | Pipeline service delivery model   | Market sensitive cost inputs | Outlines JEN's rationale for changes to JAM's service delivery.<br>The terms of the FSA contract are commercially sensitive. | Disclosure could harm subcontractors' reputation in the market.<br>Disclosure could harm Zinfra's negotiations with other clients should these potential clients seek to impose similar terms. | 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.<br>Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes. |
| Supporting documents, including: <ul style="list-style-type: none"> <li>REG-JEN 016 'Amendments to the AMA'</li> <li>REG-JEN 017 'Amendments to</li> </ul>                           | Commercial agreement  | 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 harm Zinfra's negotiations with other clients should these potential clients seek to impose similar terms.  | 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  |
|--|---|---|--|--|--|--|
| the AMA2'<br>• REG-JEN 033<br>'Field services agreement'<br>Whole documents  |   |   |  |  |  | Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.  |
| <b>Response to section 21 of Schedule 1 to the RIN</b>   |   |   |  |  |  |  |
| Cells D1189:11189,<br>D1192:11194,<br>D1199:11201,<br>D1204:11205,<br>'Schedule 1 response' sheet<br>Within text and table | Customer names and avoided TUOS payments    | Avoided TUoS                                  | Personal information                               | The information relates to individual payments for each customer receiving avoided TUOS payments. 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. |
| <b>Response to section 31 of Schedule 1 to the RIN</b>   |   |   |  |  |  |  |
| Supporting documents<br>• REG-JEN 008<br>'RIN-E Audit report final – Actual and estimates'                                 | Audit opinion of financial information      | Audit report                                  | Market sensitive cost inputs / Market intelligence | Public disclosure could have value implications for Jemena's traded debt. If the audit report in question (and potential similar future reports) were to be published, investors could             | JEN's Special purpose financial report is confidential in entirety, as there would be harm to both JEN and the Auditor, should the report be publicly disclosed. While | 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.   |

## 1 — CONFIDENTIALITY CLAIMS

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|---|---|---|--------------------------|---|--|---|
| <ul style="list-style-type: none"> <li>REG-JEN 'RIN-E Audit report final – Backcasting'</li> </ul> Entire documents |   |   |                          | rely on the information in those reports.                         | JEN is not publicly listed, the Jemena Group has publicly listed debt. Therefore, public information could have value implications for Jemena's traded debt. If the audit report in question (and potential similar future reports) were to be published, investors could rely on the information in those reports. Most investors would not understand the difference between a statutory audit report and a regulatory audit report. Given this, any potential non-compliance with an AER Regulatory Information Notice (RIN), which may be noted in a regulatory audit report, could mistakenly be perceived by investors as an issue with JEN's statutory financial reporting. This could damage JEN's reputation with investors and result in unnecessary costs of JEN issuing explanations and |   |



| 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 |
|--|---|---|--------------------------|---|--|---|
|  |   |   |                          |   | re-assurances to the market. As KPMG have explained to the AER in the past, such a situation could also create liability for KPMG. |   |

### 2. PROPORTION OF CONFIDENTIAL INFORMATION

Section 3.3 of the AER's confidentiality guideline requires NSPs must complete the proportion of confidential material notice as part of the manner in which they must make confidentiality claims. JEN must specify the number of pages in their submissions which contain a confidential claim and the number of pages which do not. Table 2-1 contains the required information for JEN's 2016 regulatory proposal.

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 to the EDPR RIN.

**Table 2–1: JEN 2015-20 EDPR RIN response—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 |
|--|--|---|-------------------------------------|--|---|
| JEN response to EDPR RIN (Schedule 1 response and excel RIN templates, excluding supporting documentation) | 15 sheets  | 52 sheets   | 67 sheets                           | 22%  | 78%   |
| Supporting documentation   | 2922   | 3403  | 6325                                | 46%  | 54%   |

(1) This is an approximate indication of the proportion of material in JEN's 2016-20 EDPR RIN response that is subject to a claim of confidentiality compared to that which is 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.