



# Jemena Electricity Networks (Vic) Ltd

## 2021-26 Electricity Distribution Price Review Revised Proposal

Attachment OV-02

Claims for confidentiality



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## Overview

As a part of this revised regulatory proposal, Jemena Electricity Network (Vic) Ltd (**JEN**) claims confidentiality over some of the materials. JEN is making this confidential information available to assist the AER to perform its functions under the National Electricity Rules. These claims and the approach to presenting them are made in accordance with the requirements of the Australian Energy Regulator's (**AER's**) confidentiality guideline.<sup>1</sup>

JEN has detailed how and why the disclosure of the information would cause detriment to the business or our customers. JEN considers that, in each case, the 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 identifies the confidential information in the revised proposal documents by highlighting the content in yellow text [REDACTED]. It has not been possible to highlight all diagrams or elements included as pictures in documents due to document formatting restrictions. In these instances, JEN has made it clear in section 1 that the relevant item is subject to a confidentiality claim.

Where we provide confidential information, and therefore the document is identified as confidential, an equivalent public version of the document is also provided – the public document has the relevant confidential sections redacted. This approach applies in all cases, except where the whole document is flagged as confidential, in which case, only a confidential version of the document is provided.

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

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

## 1. Revised regulatory proposal – confidentiality claims

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
<p><b>JEN - AON Att 05-04 Jemena Insurance Report 2020 – 20201203 – Confidential</b></p> <p>Whole report</p>	<p>Details of JEN's insurance arrangements</p>	<p>Operating expenditure</p>	<p>Market sensitive cost inputs</p>	<p>Reveals details of our insurance costs and strategic approach for procuring insurance</p>	<p>Disclosure of this information may harm JEN's ability to procure competitively priced insurance in the future and impact the legitimate commercial interests of JEN and its related parties</p>	<p>JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices</p>
<p><b>JEN – 09-07M ACS Metering Exit Fees Model – 20201203 – Confidential</b></p> <p>'Input Costs' tab Cells N64:T65, N71:T72, I94 and K97</p> <p>'Calc Infil and execution costs' tab Cells I37, N37:T37, K39 and N39:T39.</p>	<p>Unit rates based on supplier contracted values Associated volumes have also been claimed as confidential to avoid the unit rate being inferred</p>	<p>Capital expenditure and operating expenditure</p>	<p>Market sensitive cost inputs</p>	<p>Revealing unit rates may prejudice future tender and commercial negotiation processes between JEN and its service providers</p>	<p>Disclosure of this information may harm JEN's ability to procure competitively priced services in the future and impact the legitimate commercial interests of JEN</p>	<p>JEN is not aware of any material public benefit in publicly disclosing information. Customers benefit from JEN procuring cost efficient inputs to the delivery of network services</p>
<p><b>JEN – 09-11M ACS Fee Based Services Model – 20201203 – Confidential</b></p> <p>Tab 'Input Time' cells K25:K27, M25:N27, K41:K43 &amp; M41:N43</p> <p>Tab 'Calc Base year cost' cells L33:M35 &amp; L49:M51</p> <p>Tab 'A1 NC 1Ph BH' cells I86:J96</p>	<p>Unit rates and costs of suppliers e.g. contractor costs, material costs, etc</p>	<p>Capital expenditure and operating expenditure</p>	<p>Market sensitive cost inputs</p>	<p>Revealing unit rates may prejudice future tender and commercial negotiation processes between JEN and its service providers</p>	<p>Disclosure of this information may harm JEN's ability to procure competitively priced services in the future and impact the legitimate commercial interests of JEN</p>	<p>JEN is not aware of any material public benefit in publicly disclosing information. Customers benefit from JEN procuring cost efficient inputs to the delivery of network services</p>

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
<p>Tab 'A2 NC 1Ph AH' cells I86:J96</p> <p>Tab 'A3 NC 3Ph BH' cells I86:J93</p> <p>Tab 'A4 NC 3Ph AH' cells I86:J93</p> <p>Tab 'A5 Temp 1Ph BH' cells I86:J96</p> <p>Tab 'A6 Temp 1Ph AH' cells I86:J96</p> <p>Tab 'A7 Temp 3Ph BH' cells I86:J93</p> <p>Tab 'A8 Temp 3Ph AH' cells I86:J93</p> <p>Tab 'A9 Supply upgrade BH' cells I86:J93</p> <p>Tab 'A10 Supply upgrade AH' cells I86:J93</p> <p>Tab 'A11 OH SL repl. BH' cells I86:J95</p> <p>Tab 'A12 OH SL repl. AH' cells I86:J95</p> <p>Tab 'A13 Field Re-en BH' cells D22:J25, D43:J43, J58, J61 &amp; J131:J132</p> <p>Tab 'A14 Field Re-en AH' cells D22:J25, D43:J43, J58, J61 &amp; J131:J132</p> <p>Tab 'A15 Field De-en BH' cells D22:J27, D43:J43, J58, J61 &amp; J131:J132</p> <p>Tab 'A29 Meter read – field' cells D22:J25, D43:J43, I50:J50, J61 &amp; J131:J132</p> <p>Tab 'A30 Meter test BH' cells D22:J27, D43:J43, I50:J50, J61 &amp; J131:J132.</p> <p>Tab 'A31 Meter test AH' cells D22:J27, D43:J43, I50:J50, J61 &amp; J131:J132</p> <p>Tab 'A32 type 7 metering' cells</p>						

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
M23:M24 Tab 'A37 OH 3Ph SL repl. BH' cells I86:J91 Tab 'A38 OH 3Ph SL repl. AH' cells I86:J91						

## 2. Proportion of confidential information

Section 3.3 of the AER’s confidentiality guideline requires Network Service Providers to complete the proportion of confidential material notice as part of the manner in which they must make confidentiality claims. JEN must specify the number of pages in their submissions which contain a confidential claim and the number of pages which do not. Table 2–1 contains the required information for our revised proposal covering the next regulatory period.

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

**Table 2–1: Proportion of confidential information**

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
JEN 2021-26 Revised Regulatory Proposal - Overview	0	79	79	0	100
JEN 2021-26 Revised Regulatory Proposal – Short on time	0	9	9	0	100
Attachment OV-01	0	4	4	0	100
Attachment OV-02	0	9	9	0	100
Attachment 01-01	0	14	14	0	100
Attachment 01-02	0	15	15	0	100
Attachment 02-01	0	16	16	0	100
Attachment 03-01	0	37	37	0	100
Attachment 03-01M	0	15	15	0	100
Attachment 03-02M	0	11	11	0	100
Attachment 03-03M	0	6	6	0	100
Attachment 03-06M	0	7	7	0	100

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Attachment 04-01	0	52	52	0	100
Attachment 04-02	0	23	23	0	100
Attachment 04-03	0	36	36	0	100
Attachment 04-04	0	3	3	0	100
Attachment 04-05	0	33	33	0	100
Attachment 04-06	0	2	2	0	100
Attachment 04-01M	0	15	15	0	100
Attachment 05-01	0	47	47	0	100
Attachment 05-02	0	45	45	0	100
Attachment 05-03	0	7	7	0	100
Attachment 05-04	2	0	2	100	0
Attachment 05-05	0	38	38	0	100
Attachment 05-06	0	6	6	0	100
Attachment 05-07	0	31	31	0	100
Attachment 05-01M	0	11	11	0	100
Attachment 06-01	0	22	22	0	100
Attachment 06-01M	0	2	2	0	100
Attachment 06-02M	0	7	7	0	100
Attachment 06-03M	0	3	3	0	100
Attachment 07-01	0	21	21	0	100
Attachment 08-01	0	22	22	0	100



Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Attachment 09-01	0	46	46	0	100
Attachment 09-01M	0	14	14	0	100
Attachment 09-02M	0	12	12	0	100
Attachment 09-03M	0	12	12	0	100
Attachment 09-07M	1	8	9	89	11
Attachment 09-09M	0	17	17	0	100
Attachment 09-10M	0	13	13	0	100
Attachment 09-11M	23	36	59	61	39
Attachment 10-01	0	17	17	0	100
Attachment 11-01	0	11	11	0	100
Attachment 11-02	0	31	31	0	100
Attachment 12-01	0	71	71	0	100
Attachment 12-02	0	233	233	0	100
Attachment 12-03	0	11	11	0	100
<b>Total</b>	<b>26</b>	<b>1180</b>	<b>1206</b>	<b>2.2%</b>	<b>97.8%</b>

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