

Jemena Gas Networks (NSW) Ltd

JGN response to Access Arrangement Regulatory Information Notice

Appendix L

Confidentiality claims

Public

30 June 2014



Page intentionally blank

1. CONFIDENTIALITY CLAIMS

The Australian Energy Regulator (**AER**) served Jemena Gas Network (**JGN**) a final access arrangement regulatory information notice (**AA RIN**) on 28 March 2014. Clause 21 of the RIN requires JGN to make claims for confidentiality over any JGN information in accordance with the requirements of the AER's confidentiality guideline.

Table 1–1 sets out specific sections of JGN's 2015 AA RIN that JGN claims to be commercial-in-confidence and the basis of the claim. JGN's confidentiality claims for the JGN's 2015 access arrangement submission are separately listed at appendix 1.8 to the access arrangement information.

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

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

JGN 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, JGN has made it clear in Table 1-1 that the relevant item is subject to a confidentiality claim.

JGN has marked confidential information in spreadsheets by formatting the cells as [c-i-c].

1 — CONFIDENTIALITY CLAIMS

Table 1–1: JGN AA 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
Response to clause 3.1 of Schedule 1 to the RIN						
Page 9	Forecast 2014-15 volume of demand in GJ and number of users	Pipeline and pipeline services	Personal information	The information relates to individual customer consumption.	JGN considers that publishing the information would reveal private information relating to individual customer consumption.	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.
Response to clauses 6.11, 6.13 and 6.14 of Schedule 1 to the RIN						
Supporting documentation (see the clause 6 folder) File name: 'RIN clauses 6.11 and 6.13 - AA2015 - JGN IT Capex' Cells G5 to L181 (but excluding cells L16, L55, L74, L89, L110, L131, L141, L159, L182) Cells G186 to K194.	IT capex values	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 JGN 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 JGN 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 JGN's legitimate business	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.

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
					interests and, ultimately, increase costs passed on to customers.	
<p>Supporting documentation (see the clause 6 folder)</p> <p>File name: 'RIN clauses 6.11, 6.13 and 6.14 - AA2015 - JGN Network Capex' Cells D4 to K291</p>	Capex values and project summary	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 JGN 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 JGN 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 JGN's legitimate business interests and, ultimately, increase costs passed on to customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. 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 (see the clause 6 folder)</p> <p>File name: 'RIN cl 6.14 - AA2015 - JGN IT Capex'</p>	IT capex values	Capex	Market sensitive cost inputs	The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and	Public disclosure of this information could undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	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

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
Cells F3 to F34				commercial negotiation processes between JGN and its potential service providers.	This is because vendors would gain an insight into how much JGN 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 JGN's legitimate business interests and, ultimately, increase costs passed on to 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.
Response to clause 6.15 of Schedule 1 to the RIN						
Supporting documentation Policy documents folder (see the cl6.15 folder under the cl 6 folder) Capacity Management Plan File name: 'C414 - Capacity Management Plan Policy Jun 2014' Third column of	Capacity Management Plan	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 JGN 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 JGN has historically paid, or forecast to pay to establish the required capability. This could set a floor in the market when procuring	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.

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
Table 13, pp. 34-35.					such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed on to customers.	
Supporting documentation Policy documents folder (see the cl6.15 folder under the cl 6 folder) Minor capital works procedure File name: 'Minor Capital Works Procedure v1 May 2014' Entire document	Minor capital works procedure	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 JGN 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 JGN 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 JGN's legitimate business interests and, ultimately, increase costs passed on to customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. 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

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 documentation Policy documents folder (see the cl6.15 folder under the cl 6 folder) Asset strategy File name: 'C516 & 517- MDL System Asset Strategy Policy Jun 2014' Entire document	Asset strategy	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 JGN 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 JGN 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 JGN's legitimate business interests and, ultimately, increase costs passed on to customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
Supporting documentation 'Opportunity briefs etc' folder (see the cl6.15 folder under the cl 6 folder). Entire folder	JGN's internal opportunity briefs	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 JGN and its potential service	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 JGN has historically paid, or	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

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
				providers.	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 JGN's legitimate business interests and, ultimately, increase costs passed on to customers.	the relevant interested parties involved in regulatory processes.
Response to clause 6.16 of Schedule 1 to the RIN						
Supporting documentation (see the clause 6 folder) File name: 'FY15-21 JGN Distribution Capital Program Delivery Plan' Entire document	Capex deliverability	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 JGN 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 JGN 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 JGN's legitimate business	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.

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
					interests and, ultimately, increase costs passed on to customers.	
Responses to clauses 9.4 and 9.5 of Schedule 1 to the RIN						
Response to 9.5(c) in relation to JGN AMA, p. 44 (Five highlighted items in bullets)	Cost information	Related party transactions	Market sensitive cost inputs	Information specifies JAM incurred costs by category. Provision of the detailed capex program financial information undermines the request for quote, request for tender and negotiating strategies to achieve efficient costs.	Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers.	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.
Response to 9.5(c) in relation to JGN FSA, pp. 44 and 45 (Two highlighted items)	Margin	Pipeline service delivery model	Market sensitive cost inputs	Provides margin percentages. These are commercially sensitive for Zinfra as this could provide a baseline for which other clients seek matching deals.	Public 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, 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

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
Response to 9.5(e) in relation to JGN FSA, p. 46 (2 highlighted items)	Margin	Pipeline service delivery model	Market sensitive cost inputs	Provides margin percentages. These are commercially sensitive for Zinfra as this could provide a baseline for which other clients seek matching deals.	Disclosure could harm Zinfra's negotiations with other clients should these potential clients seek to impose similar terms.	processes. 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.
Supporting documentation (see the clause 9 folder) File name: 'Internal memorandum - change notice to JGN AMA' Entire document	Change notice for 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, 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.

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>Supporting documentation (see the clause 9 folder)</p> <p>Including the files:</p> <p>a) 'FSA - executed version13 09 12 Field Services Agreement between JGN (NSW) Limited, JAM PL and Zinfra Contracting PL'</p> <p>b) 'FSA Annexure A General Terms & Conditions'</p> <p>c) 'FSA Annexure B Contract Schedules'</p> <p>Entire documents</p>	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, 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.
<p>Supporting documentation (see the clause 9 folder)</p> <p>Including the files:</p> <p>a) '090824 Asset</p>	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, JGN is not aware of any material incremental benefit from the AER publishing this

Title, page and paragraph number of document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Reasons supporting why the identified detriment is not outweighed by the public benefit
Management Agreement JGN & JAM original' b) 'AMA change notice' c) '13 06 07 Letter to JAM re Amendments to the Asset Management Agreement between JGN and JAM' d) '13 09 12 Field Services Agreement between JGN (NSW) Limited, JAM PL and Zinfra Contracting PL' e) 13 12 18 Ltr from JGN re Asset Management Agreement - first extension of agreement						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

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
(clause 4.3) between JGN and JAM Entire documents						
Supporting documentation File names: a) JGN board paper with file name 'Paper 5 - JGN Field Services Procurement' b) 16 08 09 JAM Board paper re JGN Field Services Agreement (Revised 190813) Entire documents	Internal consideration of the supply of outsourced services.	Pricing methodology	Market sensitive cost inputs	Information specifies cost and pricing structures and JGN's procurement strategy.	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, 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.
Supporting documentation File name: 'PwC expert report on 2008-09 costs' Entire document	Assessment of Jemena's whole of business cost allocation methodology	Cost allocation	Market sensitive cost inputs and market intelligence	The document refers to detailed listing of cost centre structure and function, cost allocation and attribution principles and detailed methodology applying to Jemena Group where JGN	Disclosing the information would provide an opportunity for competitors in the unregulated business of Jemena to obtain advantage by providing information to the	Jemena's businesses including JGN benefit from economies of scale resulting in competitive advantage to the group and lower costs to customers. Compromising competitive processes may lead to higher

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>is only one of many assets owned.</p> <p>It also details the organisational cost structure across both regulated and unregulated / competitive businesses.</p>	<p>market that is otherwise not publicly available.</p> <p>The document contains information pertaining to cost categories, cost allocation and attribution that might adversely impact the ability of the business to obtain competitive prices in future transactions such as tender processes.</p>	<p>input costs and higher cost of service to customers.</p>
Appendix A - RIN Templates						
<p>Template 3 – capex summary</p> <p>Tables 3.1, 3.2 and 3.3.</p> <p>Cell range includes all rows with heading ‘Related party margin’ in column B.</p> <p>Cell range includes all rows with totals for which related party margin could be derived.</p>	<p>The margin paid to JGN’s related parties</p>	<p>Margin</p>	<p>Market sensitive cost inputs</p>	<p>Revealing the margin could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN’s legitimate business interests and, ultimately, increase costs passed onto customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers’ commercial negotiations with other clients (who would likely</p>	<p>The details relating to JGN’s outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN’s and those parties’ legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial</p>	<p>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.</p>

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
				demand terms no worse than those provided to JGN). Totals are also confidential to ensure margin cannot be derived.	negotiations between JGN's related parties and their unrelated customers.	
Template 3 – capex summary Tables 3.2 and 3.3. Cell range includes all rows with heading 'Contributions' in column B.	The customer contributions paid by third parties to JGN	Customer Contributions	Market sensitive cost inputs, Personal information	Revealing the customer contributions will provide information about third parties payments to JGN, potentially exposing information that is commercially sensitive to those parties.	Disclosure of customer contributions could breach confidentiality obligations and may adversely impact third parties' legitimate business interests.	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.
Template 4 – Connections market expansn Tables 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.11, 4.12, 4.13, 4.14, 4.15, 4.16, 4.18. Cell range includes all rows with heading 'Related	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a	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

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
party margin' in column B.				interests and, ultimately, increase costs passed onto customers.	competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	involved in regulatory processes.
Template 4 – Connections market expansn Tables 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.10, 4.11, 4.12, 4.13, 4.14, 4.15, 4.16, 4.18. Cell range includes all rows with heading 'Customer contributions' in column B.	The customer contributions paid by third parties to JGN	Customer Contributions	Market sensitive cost inputs, Personal information	Revealing the customer contributions will provide information about third parties payments to JGN, potentially exposing information that is commercially sensitive to those parties.	Disclosure of customer contributions and third party information could breach confidentiality obligations and may also harm third parties' legitimate business interests.	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.
Template 4 – Connections market expansn Table 4.3 Entire table	New customer connections unit rates	Capex - unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JGN'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 JGN's legitimate business	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

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
				processes.	interests and, ultimately, increase costs passed onto customers.	access to the information for the relevant interested parties involved in regulatory processes.
<p>Template 4 – Connections market expansn</p> <p>Tables 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.11, 4.11, 4.12, 4.13, 4.14, 4.15, 4.16, 4.17.</p> <p>All rows with the following headings in Column B:</p> <ul style="list-style-type: none"> • "Direct contractor costs (excl escalation)" • "Total direct costs (excl escalation)" • "Total direct costs (incl escalation)" • "Total gross costs" • "Total net 	New customer connections unit rates	Capex - unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. 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
costs"						
<p>Template 4 – Connections market expansn Table 4.17.</p> <ul style="list-style-type: none"> Cells I619:L629, AY619:BB629, E691:G701 and AU691:AW701. 	New customer connections unit rates	Capex - unit rates	Personal information	The information relates to individual projects for a single customer. 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, 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.
<p>Template 5 – Augmentation growth capacity Tables 5.1, 5.2 and 5.3 Cell range includes all rows with heading 'Related party margin', 'customer contributions', 'total gross costs' and 'total net costs' in column D.</p>	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN'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 JGN and its service providers, as well as commercial negotiations between JGN'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	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.

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
					would likely demand terms no worse than those provided to JGN).	
<p>Template 6 - Mains & services renewal Tables 6.1, 6.2, 6.3 and 6.4</p> <p>Cell range includes all rows with heading 'Related party margin' in column E.</p>	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future.</p> <p>Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p>	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	While the detriment of publishing the information is clear, JGN is not aware of any 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 6 - Mains & services renewal Table 6.1</p> <p>All rows with the following headings in Column E:</p> <ul style="list-style-type: none"> "Direct 	Mains replacement unit rates	Capex - unit rates	Market sensitive cost inputs	This information contains underlying internal (and contractor) labour costs which, if published, could affect JGN'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 JGN's	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

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>contractor costs of mains replaced (excl escalation)"</p> <ul style="list-style-type: none"> • "Total direct costs of mains replaced (excl escalation)" • "Total direct costs of mains replaced (incl escalation)" • "Gross total costs of mains replaced (incl escalation)" • "Net total cost of mains replaced (incl escalation)" 				<p>processes.</p>	<p>legitimate business interests and, ultimately, increase costs passed onto customers.</p>	<p>can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.</p>
<p>Template 7 – Mine subsidence Entire template (all tables)</p>	<p>Mine subsidence</p>	<p>Mine subsidence</p>	<p>Other</p>	<p>Claims are under legal dispute</p>	<p>Claims are under legal dispute</p>	<p>Claims are under legal dispute</p>

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>Template 8 - Facilities renewal & upgrade</p> <p>Tables 8.1, 8.2, and 8.3</p> <p>Cell range includes all rows with heading 'Related party margin', 'Total gross costs' and 'Total net costs' in column D.</p>	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p> <p>Totals are also confidential to ensure margin cannot be derived.</p>	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	While the detriment of publishing the information is clear, JGN is not aware of any 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 9 - SCADA & network control</p> <p>Tables 9.1, 9.2, 9.3 and 9.6</p> <p>Cell range includes all rows with heading 'Related party margin', 'Total gross costs' and 'Total net costs' in</p>	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business</p>	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a	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

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
column D.				<p>interests and, ultimately, increase costs passed onto customers.</p> <p>Totals are also confidential to ensure margin cannot be derived.</p>	<p>competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p>	<p>involved in regulatory processes.</p>
<p>Template 10 - Meter renewal & upgrade</p> <p>Tables 10.2, 10.3, 10.4, 10.5, 10.6, and 10.7</p> <p>Cell range includes all rows with heading 'Related party margin', 'Total gross costs' and 'Total net costs' in column B.</p>	<p>The margin paid to JGN's related parties</p>	<p>Margin</p>	<p>Market sensitive cost inputs</p>	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future.</p> <p>Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p> <p>Totals are also confidential to ensure margin cannot be derived.</p>	<p>Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p>	<p>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.</p>

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>Template 10 - Meter renewal & upgrade</p> <p>Tables 10.2, 10.3, 10.4, 10.5, 10.6, and 10.7</p> <p>All rows with the following headings in Column B:</p> <ul style="list-style-type: none"> • "Direct contractor costs (excl escalation)" • "Total direct costs (excl escalation)" • "Total direct costs (incl escalation)" • "Total gross costs" • "Total net costs" 	Meter replacement unit rates	Capex - unit rates	Market sensitive cost inputs	This information includes underlying internal (and contractor) labour costs which, if published, might affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
<p>Template 10 - Meter renewal & upgrade</p> <p>Table 10.1 – entire</p>	Meter replacement volumes by meter type	Capex	Market sensitive cost inputs	Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable	The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this

Title, page and paragraph number of document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Reasons supporting why the identified detriment is not outweighed by the public benefit
table				<p>purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.</p>	<p>confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers.</p>	<p>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 10 - Meter renewal & upgrade Table 10.6 All rows with heading "Volumes" in Column B</p>	<p>Meter replacement volumes by meter type</p>	<p>Capex</p>	<p>Market sensitive cost inputs</p>	<p>Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.</p>	<p>The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial</p>	<p>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.</p>

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
					negotiations between JGN's related parties and their unrelated customers.	
Template 10 - Meter renewal & upgrade Entire column D	Meter removal and expiry volumes by meter type	Capex	Market sensitive cost inputs	Revealing the volumes could disadvantage JGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to JGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to JGN's outsourcing arrangements (including structure and activity scope) are commercially confidential to JGN and could harm JGN's and those parties' legitimate business interests if published. Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
Template 11 - Govt Authority Work Tables 11.1, 11.2, and 11.3 Cell range includes all rows with heading 'Related	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.

Title, page and paragraph number of document	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
party margin', 'Total gross costs' and 'Total net costs' in column D.				<p>such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p> <p>Totals are also confidential to ensure margin cannot be derived.</p>	<p>JGN'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 JGN).</p>	<p>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 12 – IT & communications Table 12.1</p> <p>Cell range includes all rows with data entries related to the following headings in column D:</p> <ul style="list-style-type: none"> • 'Related party margin' • 'Total gross costs' • 'Total net costs' • 'Customer contributions' 	<p>IT historical forecast capex margin values 2010/11 to 2014/15</p>	<p>Margin</p>	<p>Market sensitive cost inputs</p>	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p> <p>Totals are also confidential to ensure margin cannot be derived.</p>	<p>Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p>	<p>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.</p>

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>Template 12 – IT & communications Table 12.1 Cells J55:J65 and AC55:AC65</p>	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	JGN uses a small number of vendors and suppliers. This information provides expenditure trends that may reduce JGN's ability to reduce future prices and expenditure for these types of products.	<p>Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers.</p> <p>Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers of products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.</p>	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.
<p>Template 12 – IT & communications Table 12.1 Cells J67:J77 and AC67:AC77</p>	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	The information names a specific vendor and product set. Disclosure of this information may lead to potential competitors choosing not to bid in future tenders as it might be viewed that the incumbent is entrenched. The information is also commercial in confidence to the product vendor, re-seller and service provider.	<p>Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers.</p> <p>Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers of products and services. This will diminish</p>	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.

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
					JGN's ability to obtain the most suitable products at the most efficient prices.	
Template 12 – IT & communications Table 12.1 Cells L115:L125 and AE115:AE125	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	The information names a specific vendor and product set. Disclosure of this information may lead to potential competitors choosing not to bid in future tenders as it might be viewed that the incumbent is entrenched. The information is also commercial in confidence to the product vendor, re-seller and service provider.	Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers. Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers of products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.	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.
Template 12 – IT & communications Table 12.1 Cells J127:L137, J139:L149, AC127:AC137, AC139:AE149	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	The information names a specific vendor and product set. Disclosure of this information may lead to potential competitors choosing not to bid in future tenders as it might be viewed that the incumbent is entrenched. The information is also commercial in	Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers. Public disclosure could discourage future bidding by vendors and resellers	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

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
				confidence to the product vendor, re-seller and service provider.	who are not incumbent providers of products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.	the relevant interested parties involved in regulatory processes.
<p>Template 12 – IT & communications</p> <p>Table 12.1</p> <p>Cells I163:M173, J175:K185, AB163: AF173, AC175:AE185</p>	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	The projects were delivered by a single service provider. Identification of the product and vendor may discourage future competitive products and service providers from bidding for new products and services.	<p>Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers.</p> <p>Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers or products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.</p>	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.
<p>Template 12 – IT & communications</p> <p>Table 12.1</p> <p>Cells J211:K221, AC211: AD221</p>	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	The projects were delivered by a single service provider. Identification of the product and vendor may discourage future competitive products and service providers from bidding for new products and	Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.

Title, page and paragraph number of document	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
				services.	Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers or products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.	Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
<p>Template 12 – IT & communications Table 12.1 Cells L235:L245, AE235: AE245</p>	<p>IT historical capex values 2010/11 to 2012/13</p>	<p>Capex</p>	<p>Market sensitive cost inputs</p>	<p>The information names a specific vendor and product set. Disclosure of this information may lead to potential competitors choosing not to bid in future tenders as it might be viewed that the incumbent is entrenched. The information is also commercial in confidence to the product vendor, re-seller and service provider.</p>	<p>Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers. Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers of products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.</p>	<p>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.</p>
<p>Template 12 – IT & communications Table 12.1</p>	<p>IT historical capex values 2010/11 to 2012/13</p>	<p>Capex</p>	<p>Market sensitive cost inputs</p>	<p>The information names a specific vendor and product set. This can discourage potential competitors in</p>	<p>Public disclosure of this information may prejudice future tender and commercial negotiation</p>	<p>While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit</p>

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
Cells K247:L257, AD247: AE257				future from bidding for new purchases as it might view the incumbent as entrenched. The information is also commercial in confidence to the product vendor, re-seller and service provider.	processes between JGN and its potential service providers. Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers or products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.	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 12 – IT & communications Table 12.1 Cells J271:L281, AC271: AE281	IT historical capex values 2010/11 to 2012/13	Capex	Market sensitive cost inputs	JGN uses a small number of vendors and suppliers. This information provides expenditure trends that may reduce JGN's ability to reduce future prices and expenditure for these types of products.	Public disclosure of this information may prejudice future tender and commercial negotiation processes between JGN and its potential service providers. Public disclosure could discourage future bidding by vendors and resellers who are not incumbent providers or products and services. This will diminish JGN's ability to obtain the most suitable products at the most efficient prices.	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.

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>Template 12 – IT & communications Table 12.3</p> <p>Cell range includes all rows with following headings in column D:</p> <ul style="list-style-type: none"> • ‘Related party margin’ • ‘Total gross costs’ • ‘Total net costs’ • Total Gross costs of augmentation • Total Net Costs of augmentation 	<p>IT historical forecast capex margin values 2010/11 to 2014/15</p>	<p>Margin</p>	<p>Market sensitive cost inputs</p>	<p>The information relates to JGN’s outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN’s and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p> <p>Totals are also confidential to ensure margin cannot be derived.</p>	<p>Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN’s related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers’ commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).</p>	<p>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.</p>
<p>Template 12 – IT & communications Table 12.1, 12.2 and 12.3</p> <p>Project level information in Columns M, N, Q to U (inclusive), AF,</p>	<p>IT Capex individual project level information</p>	<p>Capex</p>	<p>Market sensitive cost inputs</p>	<p>The material contains detailed capex program financial or strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between JGN and</p>	<p>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</p>	<p>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</p>

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
AG, AI to AM (inclusive)				its potential service providers.	how much JGN 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 JGN's legitimate business interests and, ultimately, increase costs passed on to customers.	can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
Template 13 - Other (non-distribution) Table 13.3 Cell range includes all rows with heading 'Related party margin', 'Total gross costs' and 'Total net costs' in column D.	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers. Rows with totals removed to ensure margin cannot be derived.	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. 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	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.

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
					provided to JGN).	
<p>Template 14 – Overheads Table 14.1(a) Cells: C55:Q55, T55:AH55, C103:Q103, T103:AH103 Table 14.1(b) Cells: C178:Q178, T178:AH178</p>	Labour expenditure information for employee categories with 4 or less employees	Labour opex	Personal information and market sensitive cost impacts	<p>Labour classifications with 4 or less Average Staffing Levels (ASLs) are commercial in confidence, as the employees' salaries within these bands could be identified. Salary information is 'personal information'.</p> <p>Furthermore it is also market sensitive information as this could be used by competing firms to target JGN employees for recruitment.</p>	Detriment would be caused by breaching privacy laws in 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.	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.
<p>Template 15 - Related party transactions Entire template</p>	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p>	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who	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.

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
					would likely demand terms no worse than those provided to JGN).	
<p>Template 16 – Capex allocation Tables 16.1 and 16.2</p> <p>All rows with the following headings in Column B: - "Contributions" - "Total"</p>	The customer contributions paid by third parties to JGN	Customer Contributions	Market sensitive cost inputs, Personal information	Revealing the customer contributions will provide information about third parties payments to JGN, potentially exposing information that is commercially sensitive to those parties. Totals need to be removed to ensure contributions cannot be derived.	Disclosure of customer contributions could breach confidentiality obligations and may adversely impact third parties' legitimate business interests.	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.
<p>Template 17(b) - Capex excl RPM Entire template</p>	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers'	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.

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
				customers.	commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	
<p>Template 23a - Opex incl. RPM, tables 23(a).1 and 23(a).2, Cells B43:AH61, B74:AH92, B144:B163, H144:L163, Y144:AC163, B175:B194, H175:L194, Y175:AC194, B198:B216, H198:L216, Y198:AC216</p>	<p>Enterprise Support Function values by category</p>	<p>Opex – administration and overheads</p>	<p>Market sensitive cost inputs</p>	<p>Information relates to JGN's administration and overhead costs by category.</p>	<p>The quantum expenditure and associated allocations can be used to calculate the apportionment of overheads to different service groups. Expenditure overheads allocated to service groups is commercially confidential as it could jeopardise JGN or Jemena limited's commercial position in future negotiations with prospective service providers.</p>	<p>Jemena's customers would be disadvantaged by facing higher long term costs were Jemena's negotiating position with prospective service providers deteriorates.</p>
<p>Template 23a - Opex incl. RPM, table 23(a).1, ancillary reference services, cells C107:Q116, T107:AH116</p>	<p>Disconnection and Meter removal Unit Rates.</p>	<p>Opex - unit rates</p>	<p>Market sensitive cost inputs</p>	<p>This information includes underlying internal (and contractor) labour costs which, if published, might affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement</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 JGN's</p>	<p>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</p>

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
				processes.	legitimate 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 23b - Opex excl. RPM, Table 23(b).1, ancillary reference services, cells C106:Q120, S106:AG120.	Disconnection and Meter removal Unit Rates.	Opex -unit rates	Market sensitive cost inputs	This information includes underlying internal (and contractor) labour costs which, if published, might affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
Template 23b - Opex incl. RPM, tables 23(b).1 and 23(b).2, Cells B44:AG62, B75:AG93, B143:B162, H143:L162, Y143:AC162, B174:B193, H174:L193,	Enterprise Support Function values by category	Opex – administration and overheads	Market sensitive cost inputs	Information relates to JGN's administration and overhead costs by category.	The quantum expenditure and associated allocations can be used to calculate the apportionment of overheads to different service groups. Expenditure overheads allocated to service groups is commercially confidential as it could jeopardise JGN or Jemena	Jemena's customers would be disadvantaged by facing higher long term costs were Jemena's negotiating position with prospective service providers deteriorates.

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
Y174:AC193, B197:B215, H197:L215, Y197:AC215					Limited's commercial position in future negotiations with prospective service providers.	
Template 23b - Opex excl. RPM, Table 23(b).1, ancillary reference services, cells C94:Q94, C104:Q104, S94:AG94, S104:AG104	Disconnection and Meter removal Unit Rates.	Opex - unit rates	Market sensitive cost inputs	This would reveal (or would allow the derivation of) underlying internal (and contractor) labour costs which would affect JGN's (and third party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm JGN's legitimate business interests and, ultimately, increase costs passed onto customers.	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. 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

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
Template 23b - Opex excl. RPM, Table 23(b).1, reference services, cells C32:Q72, S32:AG72	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN'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 JGN and its service providers, as well as commercial negotiations between JGN'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 JGN).	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.
Template 23b - Opex excl. RPM (Approved), Table 23(b).2, reference services , cells H133:L194, X133:AB194	The margin paid to JGN's related parties	Margin	Market sensitive cost inputs	The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future. Disclosure could therefore harm JGN's and other parties legitimate business	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a	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

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
				interests and, ultimately, increase costs passed onto customers.	competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	involved in regulatory processes.
Template 26, Table 26.1 Cells C40 to J40, C46 to J48, C51 to J52	Avoidable cost, stand alone cost and expected revenue	Efficient Pricing	Personal information	This is private information relating to individual customer bills.	The tariff classes identified have three or less customers which, if published, could potentially enable revenue from individual customers to be identified.	This is private information relating to individual customer bills.
Template 31, Tables 31.1 and 31.2 (and conversion to \$real tables) Cells D28:W29, D46:W47	UAG and licence fee pass through amounts	Financial details for UAG and Licence Fees	Market sensitive cost inputs	Revealing JGN's UAG pass through amount would diminish JGN's ability to obtain competitive UAG prices.	JGN considers that these details should remain confidential so as to not disadvantage JGN (and therefore its customers) when seeking to procure this gas via competitive tender. Note that the Licence fee figure is captured due to an ability to infer the UAG costs if both it and the total were to be published. The totals have previously been published as part of JGN's	As UAG is a pass through item, JGN customers would be worse off should JGN's tendering position deteriorate.

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
					annual tariff variation decisions.	
Appendix B – Regulatory templates basis of preparation						
<p>Appendix B - Basis of Preparation</p> <p>As marked against sections:</p> <ul style="list-style-type: none"> • 4.4, (column 5, p. 14) • 4.11, (column 5, p. 39) • 15.1, (column 4, p. 156) • 15.3, (column 4, pp. 157-158) • 23.1, (column 4, p. 190) • 23.1, (column 5, p. 190) • 23.2, (column 4, pp. 192-193) • 23.2, (column 5, pp. 192) 	Disclosure of profit margins and fees (per cent and/ dollar amount)	Margins and prices for services	Market sensitive cost inputs	<p>The information relates to JGN's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when JGN seeks to procure such services in the future.</p> <p>Disclosure could therefore harm JGN's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p>	Public disclosure of this information may prejudice future tender processes between JGN and its service providers, as well as commercial negotiations between JGN's related parties and their unrelated customers. Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to JGN).	While the detriment of publishing the information is clear, JGN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.

Title, page and paragraph number of document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Reasons supporting why the identified detriment is not outweighed by the public benefit
<p>Appendix B supporting documentation folder PwC letter File name: 'PwC letter on 2005-06 to 2007-08 costs' Entire document</p>	<p>Assessment of Jemena's whole of business cost allocation methodology</p>	<p>Cost allocation</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>The document refers to detailed listing of cost centre structure and function, cost allocation and attribution principles and detailed methodology applying to Jemena Group where JGN is only one of many assets owned. It also details the organisational cost structure across both regulated and unregulated / competitive businesses.</p>	<p>Disclosing the information would provide an opportunity for competitors in the unregulated business of Jemena to obtain advantage by providing information to the market that is otherwise not publicly available. The document contains information pertaining to cost categories, cost allocation and attribution that might adversely impact the ability of the business to obtain competitive prices in future transactions such as tender processes.</p>	<p>Jemena's businesses including JGN benefit from economies of scale resulting in competitive advantage to the group and lower costs to customers. Compromising competitive processes may lead to higher input costs and higher cost of service to customers.</p>
<p>Appendix E - Jemena gas and water enterprise agreement</p>						
<p>Appendix E Entire table on p.35 and bullets under E.2.1 and E.4.1 on pp. 35-36.</p>	<p>Employees private information within under the Jemena Gas and Water Enterprise Agreement 2012</p>	<p>Escalators</p>	<p>Personal information</p>	<p>The information relates to individual employees personal information</p>	<p>JGN considers that publishing the information would reveal employees private information.</p>	<p>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.</p>

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
Appendix F - response to cl. 5.2(c) of schedule 1 of the RIN						
Appendix F, fifth column of table F1-1	JGN vendor price information	Comparing historical escalators to realised price changes	Market sensitive cost inputs	Information relates directly to JGN's procured prices from vendors.	JGN's ability to obtain competitive prices in future tender processes would deteriorate if the information was in the public domain.	JGN's customers would be disadvantaged by facing higher long-term costs should JGN's tendering position deteriorate.
Appendix I - cost allocation policy and methodology						
Appendix I Jemena Cost Allocation Policy and Methodology Entire document	Details of organisational and cost centre structure Description of methodology used to attribute and allocate costs of Jemena to JGN and other assets	Cost Allocation Methodology	Market sensitive cost inputs and market intelligence	The document contains detailed listing of cost centre structure and function, cost allocation and attribution principles and detailed methodology applying to the Jemena Group where JGN is only one of many assets owned. It also details the organisational cost structure across both regulated and unregulated / competitive businesses.	The document contains details of cost allocation and attribution across a portfolio of assets and functions that are not limited to the JGN regulated gas distribution network business. It describes the methodology employed across both regulated and non-regulated businesses. This provides an opportunity for competitors in the unregulated business of Jemena to obtain advantage by providing information to the market that is otherwise not publicly available.	Jemena's businesses including JGN benefit from economies of scale resulting in competitive advantage to the group and lower costs to customers. Compromising competitive processes may lead to higher input costs and higher cost of service to customers.

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>The document contains information pertaining to cost categories, cost allocation and attribution that might adversely impact the ability of the business to obtain competitive prices in future transactions such as tender processes.</p> <p>The information may compromise the competitive standing for future service offerings such as in the asset management and works delivery segments for external customers.</p> <p>Detailed cost-centre information contained in the document may provide competitors insight into the operations and structure of the organisation that could compromise competitive standing in non-regulated market segments in which the Jemena business operates.</p>	

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
Appendix J - JGN tax loss position model						
Appendix J, JGN tax loss calculation model Cells L68:M68, L71:M71, L85:M85, and L88:M88	Forecast revenues	Revenue	Other	Forecast revenue is market sensitive information. SGSPAA does not release forecast financial information publicly. Some total values have been removed to ensure forecast revenues cannot be derived.	Disclosure of forecast financial information may influence investment decisions by current and potential investors in SGSP (Australia) Assets Pty Ltd and Jemena Ltd. The information contained in the JGN tax loss calculation model is not accompanied by information a person may reasonably require to make an informed investment decision.	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.
Appendix N – Colour coded regulatory templates						
Appendix N Entire workbook	A version of the regulatory templates response (appendix A) colour coded to indicate the level of robustness of estimated and forecast information	RIN response	Market sensitive cost inputs, personal information, other	Information contains confidential information as per appendix A to the RIN response. The only difference is that JGN has colour coded the response to provide an indication to the AER of the level of robustness of estimated and forecast information.	Detriment would be caused for the same reasons as provided for each individual claim for appendix A to the RIN response.	The colour coding of the regulatory templates RIN response has been provided for the benefit of the AER to assist in performing its functions under the law and rules. It does not provide any additional benefit to customers over and above the benefit provided to the AER and via the publicly available

Title, page and paragraph number of document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Reasons supporting why the identified detriment is not outweighed by the public benefit
						information of appendix A to this RIN response.

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. JGN 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 JGN's 2015-20 Access Arrangement proposal.

For the purposes of this calculation, JGN has made the assumption that one sheet in an excel template equals one page. JGN has also provided totals excluding supporting documentation to the AA RIN.

Table 2–1: JGN 2015-20 AA 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
JGN response to AA RIN (excluding supporting documentation)	169	475	644	26%	74%
Supporting documentation	6141	286	6427	96%	4%

(1) This is an approximate indication of the proportion of material in JGN's 2015-20 Access Arrangement proposal 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.