



Jemena Electricity Networks (Vic) Ltd

Application to reopen the 2021-26 Electricity Distribution Price Review Determination

Claims for confidentiality



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Overview

Section 1 below sets out specific sections of the supporting materials and models that make up Jemena Electricity Networks (Vic) Ltd.'s (**JEN's**) application to the Australian Energy Regulator (**AER**) to reopen its current electricity distribution price determination covering the regulatory control period between 1 July 2021 and 30 June 2026 (current regulatory period) for a capital expenditure variation event, that JEN claims to be confidential and the basis of the claim. JEN has applied the rationale for claiming information as confidential as set out in the AER's confidentiality guideline.¹

JEN has provided reasons detailing how and why disclosure of the information would cause detriment to the business or to our customers. JEN understands that this confidential information being available to the AER to perform its functions under the rules provides a public benefit. JEN has assessed that, in all identified cases, JEN's confidentiality reasons, together with the benefits already realised through the AER's confidential use of this data, are not outweighed by any additional public benefit to disclosure of the information.

JEN has marked confidential information in documents by highlighting the content in yellow text [REDACTED]. It has not been possible to highlight all diagrams or elements included as pictures in documents. In these instances, JEN has made it clear in section 1 that the relevant item is subject to a confidentiality claim.

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

¹ AER, *Better Regulation, Confidentiality Guideline*, August 2017.

1. Reopener application confidentiality claims

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
JEN – Att 01-01 – 2021-26 Regulatory Proposal Reopener Application – 20241015 Pages [11, 14-17]	Customer information, including names, consumption capacity, and unique identifies	Customer names and demand	Market sensitive information	Reveals commercially sensitive information about major connection customers' capacity requirements and connection work staging	This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers	This is customer confidential information that may impact those customer's business interests. There is no public benefit to identifying this customer information
JEN – Att B-01 – Unforeseen event expenditure – CONFIDENTIAL Pages [9-11, 17-20, 23-25, 29-33, 39, 40, 42, 43, 50-55]	Customer information, including names, consumption capacity, and unique identifies Procurement arrangements relating to project delivery	Customer names and demand Procurement arrangements relating to project delivery	Market sensitive information	Reveals commercially sensitive information about major connection customers' capacity requirements and connection work staging Reveals information that could prejudice JEN's future commercial procurement activities	This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers Public disclosure could impact Jemena's ability to procure resources in the future, meaning customers may be more exposed to higher costs in the future.	This is customer confidential information that may impact those customer's business interests. There is no public benefit to identifying this customer information While the detriment of publishing the information is clear, JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Page [21]	Outlining competitive strategic information that customers consider	Procurement arrangements relating to project delivery	Market sensitive information	Reveals commercially sensitive information about major connection customers' business decisions when developing their business models and making investment decision	Publishing this strategic information from customers in a highly competitive market could impact them and other customers	This is customer confidential information shared with Jemena that may impact those customer's business interests. There is no public benefit to identifying this customer information While the detriment of publishing the information

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
						<i>is clear, JEN is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.</i>
JEN – ACIL Allen Att B-02 – 20241011 Briefing Note to Jemena – CONFIDENTIAL Pages [4, 5]	<i>Customer information, including names, consumption capacity, and unique identifiers</i>	<i>Customer names and demand</i>	<i>Market sensitive information</i>	<i>Reveals commercially sensitive information about major connection customers’ capacity requirements and connection work staging</i>	<i>This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers</i>	<i>This is customer confidential information that may impact those customer’s business interests. There is no public benefit to identifying this customer information</i>
JEN – Att B-03 – Network impacts case study – CONFIDENTIAL All pages	<i>Customer information, including names, consumption capacity, and unique identifiers</i>	<i>Customer names and demand</i>	<i>Market sensitive information</i>	<i>Reveals commercially sensitive information about major connection customers’ capacity requirements and connection work staging</i>	<i>This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers</i>	<i>This is customer confidential information that may impact those customer’s business interests. There is no public benefit to identifying this customer information</i>
JEN – Morgan Stanley Research Att B-07 – Data Centre Handbook - 20240505 – CONFIDENTIAL All pages	<i>Customer information, including names, consumption capacity, and unique identifiers</i>	<i>Customer names and demand</i>	<i>Market sensitive information</i>	<i>Reveals commercially sensitive information about major connection customers’ capacity requirements and connection work staging</i>	<i>This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers</i>	<i>This is customer confidential information that may impact those customer’s business interests. There is no public benefit to identifying this customer information</i>
JEN – Att C-01 – Unforeseen Major Connections Model – CONFIDENTIAL Cells C38:C78, O38:X78, AE38:AF78, AI38:AJ78 of the ‘Inputs’ sheet; cells C11:C51 of the	<i>Customer information, including names, consumption capacity,</i>	<i>Customer names and demand</i>	<i>Market sensitive and personal information</i>	<i>Reveals commercially sensitive information about major connection customers’ capacity requirements, connection work staging, and</i>	<i>This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers</i>	<i>This is customer confidential information that may impact those customer’s business interests. There is no</i>

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
'Calc Expenditure' sheet; and cells C11:C51 of the 'Calc Contribution' sheet	<i>and unique identifiers</i>			<i>expenses (e.g., contribution requirements) Also reveals personal information, such as names and locations</i>		<i>public benefit to identifying this customer information</i>
JEN – farrierswier Att E-01 - Survey report - 20241002 – CONFIDENTIAL Pages [2, 5]	<i>Customer information, including customer names</i>	<i>Customer name</i>	<i>Market sensitive information</i>	<i>Reveals commercially sensitive information about a major connection customer, their views and preference</i>	<i>This confidential information outlines a customer by name and their preferences. When the surveys were issued, confidentiality over the results was offered to encourage as many responses as possible; we anticipated that few responses would be received if the option for confidentiality was not provided.</i>	<i>This is customer confidential information that may impact those customer's business interests. There is no public benefit to identifying this customer information</i>
JEN – Att F-01 – DC02 – 20241015.zip ... to JEN – Att F-19 – 20241015.zip All pages	<i>Customer information, including names, consumption capacity, and unique identifies</i>	<i>Customer names and demand</i>	<i>Market sensitive information</i>	<i>Reveals commercially sensitive information about major connection customers' capacity requirements and connection work staging</i>	<i>This confidential information relates to information about customer connection requirements and future usage. Publishing this information could harm the legitimate business interests of those customers</i>	<i>This is customer confidential information that may impact those customer's business interests. There is no public benefit to identifying this customer information</i>

2. Proportion of confidential information

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

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

Table 2–1: Proportion of confidential information

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
<i>Attachment 01-01</i>	5	51	56	89%	11%
<i>Attachment B-01</i>	26	33	59	44%	56%
<i>Attachment B-02</i>	2	6	8	25%	75%
<i>Attachment B-03</i>	8	0	8	100%	0%
<i>Attachment B-04</i>	0	40	40	0%	100%
<i>Attachment B-05</i>	0	40	40	0%	100%
<i>Attachment B-06</i>	0	400	400	0%	100%
<i>Attachment B-07</i>	82	0	82	100%	0%
<i>Attachment C-01</i>	3	4	7	43%	57%
<i>Attachment D-01</i>	0	15	15	0%	100%
<i>Attachment D-02</i>	0	14	14	0%	100%
<i>Attachment E-01</i>	2	3	5	40%	60%
<i>Attachment F-01</i>	70	0	70	100%	0%
<i>Attachment F-02</i>	66	0	66	100%	0%

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Attachment F-03	38	0	38	100%	0%
Attachment F-04	59	0	59	100%	0%
Attachment F-05	14	0	14	100%	0%
Attachment F-06	10	0	10	100%	0%
Attachment F-07	18	0	18	100%	0%
Attachment F-08	23	0	23	100%	0%
Attachment F-09	10	0	10	100%	0%
Attachment F-10	28	0	28	100%	0%
Attachment F-11	10	0	10	100%	0%
Attachment F-12	12	0	12	100%	0%
Attachment F-13	131	0	131	100%	0%
Attachment F-14	37	0	37	100%	0%
Attachment F-15	8	0	8	100%	0%
Attachment F-16	68	0	68	100%	0%
Attachment F-17	31	0	31	100%	0%
Attachment F-18	3	0	3	100%	0%
Attachment F-19	19	0	19	100%	0%
Attachment G-01	0	9	9	0%	100%
Attachment G-02	0	4	4	0%	100%
Total	783	619	1402	56%	44%

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