



Jemena Electricity Networks (Vic) Ltd

2026-31 Electricity Distribution Price Review Regulatory Proposal

Attachment 12-02

Claims for confidentiality



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Overview

The Australian Energy Regulator (**AER**) served Jemena Electricity Network (Vic) Ltd (**JEN**) a final Electricity distribution price review regulatory information notice (**EDPR RIN**) on 17 October 2024. Section 2.4 of the RIN requires JEN to make claims for confidentiality over any JEN information in accordance with the requirements of the AER's confidentiality guideline.

Section 1 below, sets out specific sections of JEN's regulatory proposal—covering the 1 July 2026 to 30 June 2031 regulatory control period—that JEN claims to be confidential and the basis of the claim. JEN has also done this for all RIN response and supporting documents in *JEN - RIN 10 - Claims for confidentiality*. 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. EDPR proposal confidentiality claims

Title page and paragraph number of the document	Description of the confidential information	Topic the confidential information relates to	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing the confidential information	Why the identified detriment is not outweighed by the public benefit
JEN - Att 03-01 - CER Integration Strategy - 20250131 - Confidential Page 24, Figure 4.4	Information on our vendors services	Demand, revenue and customer information	Market sensitive cost inputs and Other	Publication of this information would affect JEN's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices	Publication of this information may influence tenders in the future.	JEN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.
JEN - Att 03-01 - CER Integration Strategy - 20250131 - Confidential Page 26, Figure 4.5	Information on our vendors services	Demand, revenue and customer information	Market sensitive cost information and Other	Publication of this information would affect JEN's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices	Publication of this information may influence tenders in the future.	JEN is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment..
JEN - Att 03-01 - CER Integration Strategy - 20250131 - Confidential Page 39 & 40, Section 5.3.5, Para. 3.2, 3.3, 3.5	Naming Customer	Project name discloses customer names	Personal information	Reveals JEN's customers' name	Disclosure of this information would violate customers' right to privacy.	JEN is not aware of any material public benefit in disclosing this information that could outweigh the potential detriment
JEN – Att 05-01 Capital expenditure – 20250131 Page 22, Figures 3-5 Page 24 Figure 3-6 and paragraph 4 and 5 Page 27 Paragraph 7 Page 113 Last paragraph Page 114 Figure 6-31	Third-party forecasts of construction activity in Victoria	Capital expenditure	Other	Reveals proprietary information of third party who developed the forecasts	Disclosure of this information would commercially disadvantage the value of the third party's proprietary information and would be inconsistent with JEN's obligations with respect to the terms of use governing that information	JEN is not aware of any material public benefit in disclosing this information that could outweigh the potential detriment
JEN – Att 06-04 – Operating Expenditure Step Changes – 20250131 – Confidential Page 21, 22, 32 & 33	Unit rates and costs of suppliers e.g. contractor costs, material costs, etc	Operating expenditure	Market sensitive cost inputs	Might impact NSP's ability to obtain competitive prices.	Disclosing this information could reveal the rates of projects and associated businesses providing quotations, undermining JEN's ability to negotiate competitive terms. Additionally, it could go against the business interest of third-party companies that provide services to JEN.	JEN is not aware of any material public benefit in disclosing this information that could outweigh the potential detriment

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 08-02 Averaging periods - 20250131 – Confidential Page 1	Averaging periods	Rate of Return	Market sensitive cost inputs	Reveals commercially sensitive information about SGSPAA's refinancing and hedging window. Release of this information before the averaging period has passed could affect market behaviour	Any adverse change in market behaviour could cause JEN's actual cost of debt to be worse than it would be if that information were not in the public domain	JEN is not aware of any material public benefit in publicly disclosing information. JEN's costs may instead increase and adversely affect prices
JEN - DEECA - 09-05 ToU proposal for the 2026-31 TSS - 20240513 – Confidential Whole document	Names and signatures	Names and signatures	Personal Information	Individuals are identified in the documents	Public disclosure of personal information could bring harm to those individuals	The substance of the issues is presented in the submission documents
JEN – Att 11-04M ACS Fee based and quoted services model – 20250131 – Confidential Sheets: "InputMaterials", "ND1P", "ND3P", "BTSO", "BTSP", "SUTK", "RTK1", "RTK3"	Unit rates and costs of suppliers e.g. contractor costs, material costs, etc	Operating expenditure	Market sensitive cost inputs	Might impact NSP's ability to obtain competitive prices.	Disclosing this information could reveal the rates of projects and associated businesses providing quotations, undermining JEN's ability to negotiate competitive terms. Additionally, it could go against the business interest of third-party companies that provide services to JEN.	JEN is not aware of any material public benefit in disclosing this information that could outweigh the potential detriment
JEN - Att 12-04 Directors' certification of reasonableness of assumptions Page 2	Staff names and signatures	Staff names and signatures	Personal Information	Individuals are identified in the documents	Public disclosure of personal information could bring harm to those individuals	The substance of the issues is still presented as there is evidence of certification of the reasonableness of the assumptions

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 regulatory proposal covering the next regulatory period. A similar table can be found in *JEN - RIN 10 - Claims for confidentiality* covering the proportion of JEN’s RIN response and supporting documents for which there is a confidential claim.

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>JEN 2026-31 Proposal</i>	0	152	152	0%	100%
<i>JEN - Att 02-01 - Engagement Strategy - 20230601- Public</i>	0	86	86	0%	100%
<i>JEN - MosaicLab Att 02-02 Peoples Panel process report - 20240105 - Public</i>	0	54	54	0%	100%
<i>JEN - MosaicLab Att 02-03 Small and medium business customer forum - 20240106 - Public</i>	0	13	13	0%	100%
<i>JEN - MosaicLab Att 02-04 Customer Voice Group process report - 20240107 - Public</i>	0	22	22	0%	100%
<i>JEN - Gauge Consulting Att 02-05 Large customer forum report - 20241203 - Public</i>	0	5	5	0%	100%
<i>JEN - Gauge Consulting Att 02-06 Local Council forum report - 20240106 - Public</i>	0	14	14	0%	100%
<i>JEN - Gauge Consulting Att 02-07 Retailer forum report - 20240106 - Public</i>	0	12	12	0%	100%
<i>JEN - Sagacity Research Att 02-08 Customer priorities research report - 20241308 - Public</i>	0	27	27	0%	100%
<i>JEN - MosaicLab Att 02-09 Energy Reference Group process report - 20240105 - Public</i>	0	98	98	0%	100%
<i>JEN - RPS Att 02-10 - Joint VICDB engagement - Framework and Approach outcomes report 1 - 20230106 - Public</i>	0	28	28	0%	100%

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
JEN - RPS Att 02-11 - Joint VICDB engagement - Framework and Approach outcomes report 2 - 20232808 - Public	0	19	19	0%	100%
JEN - BD Infrastructure Att 02-12 - Joint VICDB engagement - Tariffs outcomes report 1 - 20230106 - Public	0	58	58	0%	100%
JEN - BD Infrastructure Att 02-13 - Joint VICDB engagement - Tariffs outcomes report 2 - 2023 - Public	0	76	76	0%	100%
JEN - BD Infrastructure Att 02-14 - Joint VICDB engagement - Tariffs outcomes report 3 - 2023 - Public	0	50	50	0%	100%
JEN - RPS Att 02-15 - Joint VICDB engagement - Vulnerability report 1- 20231605 - Public	0	15	15	0%	100%
JEN - RPS Att 02-16 - Joint VICDB engagement - Vulnerability report 2- 20230410- Public	0	16	16	0%	100%
JEN - Nation Partners Att 02-17- Joint VICDB engagement - Resilience report - 20242901 - Public	0	113	113	0%	100%
JEN - Att 02-18 Draft Plan Feedack Report - 20240924	0	47	47	0%	100%
JEN - Att 02-19 People's Panel Recommendations - 20240420 - Public	0	20	20	0%	100%
JEN - NewDemocracyFoundation Att 02-20 Independent Evaluation Report - 20240901 - Public	0	29	29	0%	100%
JEN - MosaicLab Att 02-21 Draft Plan Recall Day - WWS report - 20240831 - Public	0	21	21	0%	100%
JEN - MosaicLab Att 02- 22- Customer Deep Dive Outcomes Report - 20241209 - Public	0	36	36	0%	100%
JEN - Att 02-23 Energy Reference Group Report - 20240312 - Public	0	26	26	0%	100%
JEN - Att 02-24 - Engagement Strategy - 20230601- Public	0	37	37	0%	100%
JEN - Att 02-25 - Joint VICDB engagement - Small Bus Consultation Paper - 20240630 - Public	0	12	12	0%	100%
JEN - BD Infrastructure Att 02-26 - Victorian Electricity Retailers Survey - 20231023 - Public	0	26	26	0%	100%
JEN - Att 03-01 CER integration Strategy - 20250131	4	42	46	9%	91%
JEN - Att 03-02 Innovation fund - 20250131 - Public	0	32	32	0%	100%
JEN - AECOM - Att 03-03 - Joint Victorian Climate Change Study Final Report - Public	0	22	22	0%	100%

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
JEN - Att 04-01 Classification of services - 20250131 - Public	0	15	15	0%	100%
JEN - Att 04-02 Price control mechanisms - 20250131 - Public	0	14	14	0%	100%
JEN - Att 05-01 Capital expenditure - 20250131 - Public	7	181	188	4%	96%
JEN - Att 05-02 Energy forecasts report - 20250131 - Public	0	4	4	0%	100%
JEN - Blunomy Att 05-03 Peak demand - 20250131 - Public	0	3	3	0%	100%
JEN - Att 05-04 Customer numbers - 20250131 - Public	0	7	7	0%	100%
JEN - Houston Kemp Att 05-06 AER repex modelling - 20250131 - Public	0	18	18	0%	100%
JEN - Oxford Economics Att 05-07 Real cost escalation report - 20241008 - Public	0	42	42	0%	100%
JEN - Att 05-09 Connection policy - 20250131 - Public	0	31	31	0%	100%
JEN - Att 05-10M SCS Capex model - 20250131 - Public	0	18	18	0%	100%
JEN - Att 06-01 Operating expenditure - 20250131 - Public	0	40	40	0%	100%
JEN - CEG Att 06-02 Debt raising transaction cost report - 20250108 - Public	0	5	5	0%	100%
JEN - Att 06-03M SCS Opex model - 20250131 - Public	0	10	10	0%	100%
JEN - Att 06-04 Operating expenditure step changes - 20250131 - Public	4	36	40	10%	90%
JEN - Att 06-05M Opex benchmarking Roll Forward - 20250131 - Public	0	15	15	0%	100%
JEN - Att 07-01 Incentive mechanisms - 20250131 - Public	0	25	25	0%	100%
JEN - Att 07-02M CSIS model - 20250131 - Public	0	5	5	0%	100%
JEN - Att 07-03 CSIS - 20250131 - Public	0	20	20	0%	100%
JEN - Att 08-01 Annual revenue requirement - 20250131 - Public	0	23	23	0%	100%
JEN - Att 08-02 Averaging periods - 20250131 - Confidential	1	4	5	20%	80%
JEN - Att 08-03 Managing risk and uncertainty - 20250131 - Public	0	14	14	0%	100%
JEN - Att 08-04 Negotiating framework - 20250131 - Public	0	16	16	0%	100%

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
JEN – Att 08-05M SCS PTRM – 20250131 – Public	0	14	14	0%	100%
JEN – Att 08-06M Rate of return model – 20250131 – Public	0	7	7	0%	100%
JEN – Att 08-07M SCS RFM – 20250131 – Public	0	8	8	0%	100%
JEN – Att 08-08M SCS RFM - Depreciation tracking module – 20250131 – Public	0	7	7	0%	100%
JEN – Att 08-09M EBSS model – 20250131 – Public	0	2	2	0%	100%
JEN – Att 08-10M CESS model – 20250131 – Public	0	6	6	0%	100%
JEN – Att 08-11M CESS true-up model – 20250131 – Public	0	6	6	0%	100%
JEN - Att 09-01 Tariff structure statement - 20250131	0	31	31	0%	100%
JEN - Att 09-02 Tariff structure statement explanatory statement - 20250131	0	62	62	0%	100%
JEN - Oakley Greenwood - Att 09-03 Long run marginal cost model - 20241111	0	8	8	0%	100%
JEN - Att 09-04 SCS indicative pricing schedule - 20250131	0	1	1	0%	100%
JEN - DEECA - 09-05 ToU proposal for the 2026-31 TSS - 20240513 - Confidential	2	0	2	100%	0%
JEN - Att 10-01 Advanced metering infrastructure - 20250131 - Public	0	54	54	0%	100%
JEN - Att 10-01A Appendix B Metering unit rate model - 20250131	0	4	4	0%	100%
JEN – Att 10-02M ACS Metering PTRM – 20250131 – Public	0	13	13	0%	100%
JEN – Att 10-03M ACS Metering opex and capex model – 20250131 – Public	0	19	19	0%	100%
JEN – Att 10-04M ACS Metering RFM - 20250131 – Public	0	10	10	0%	100%
JEN – Att 10-05M ACS Metering RFM - Depreciation tracking module - 20250131 – Public	0	7	7	0%	100%
JEN – Att 10-06M ACS Metering exit fees model – 20250131 – Public	0	8	8	0%	100%
JEN - Frontier Economics Att 10-07 - Forecast replacement of smart meters - 20241220 - Public	0	22	22	0%	100%
JEN - Att 11-01 Alternative control services - 20250131 - Public	0	37	37	0%	100%

Submission title	No of pages of submission that include information subject to a claim of confidentiality	No of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
<i>JEN - Att 11-02 Public lighting services - 20250131 - Public</i>	0	38	38	0%	100%
<i>JEN - Att 11-03M 2024-25 ACS Labour rate model - 20250131 - Public</i>	0	9	9	0%	100%
<i>JEN – Att 11-04M ACS Fee based services model – 20250131 – Public</i>	8	33	41	20%	80%
<i>JEN – Att 11-05M ACS Public lighting model – 20250131 – Public</i>	0	14	14	0%	100%
<i>JEN – Att 11-06M ACS Public lighting inputs model – 20250131 - Public</i>	0	11	11	0%	100%
<i>JEN - Att 12-01 Compliance checklist- 20250131</i>	0	16	16	0%	100%
<i>JEN - Att 12-02 2026-31 Price Reset Claims for Confidentiality - 20250131</i>	0	10	10	0%	100%
<i>JEN - Att 12-03 Protected claims in JEN proposal – 20250131</i>	3	0	3	100%	0%
<i>JEN - Att 12-04 Directors' certification of reasonableness of assumptions - 20250131</i>	1	1	2	50%	50%
<i>JEN - Att 12-05 Statement of interdependencies - 20250132</i>	0	5	5	0%	100%
TOTAL	30	2217	2247	1%	99%

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