

Revised Final Plan  
Attachment 1.4A

# Confidentiality Claims

October 2020



Dampier Bunbury  
Pipeline

# 1. Introduction

Where possible, we have relied upon non-confidential information in the Revised Final Plan. However, in some cases it is necessary to call upon commercially sensitive or otherwise confidential information to ensure our AA Proposal is robust and complies with the requirements of the NGL and NGR.

We have assessed confidential information in accordance with the ERA's *Gas Access Arrangement* Guideline, Section 3.5 Confidential information, and the associated template, as well as having regard to NGR 43(2).

Where confidential information has been identified within a document we have marked confidential information:

- in public versions of documents by redacting confidential information; and
- in confidential versions by highlighting the equivalent confidential information (redacted in public versions) in yellow highlight.

Electronic file names for these documents are clearly labelled "PUBLIC" or "CONFIDENTIAL".

In some instances, it was also necessary to make entire documents or models confidential. These documents are clearly marked "CONFIDENTIAL" in the title, cover page and electronic file name.

Table 1 of this Attachment summarises all confidentiality claims made in relation to our revised Final Plan, attachments and proposed revisions to the Access Arrangement Document.

Table 1: DBNGP Revised Final Plan Confidentiality

Claim number	Document Title	Page number	Paragraph/Section number	Topic (eg, capex, rate of return)	Description of the Confidential information	Confidentiality category	Briefly explain why the confidential information falls within the category	Provide reasons supporting how and why detriment would be caused from disclosing the confidential information	Provide reasons supporting why the identified detriment is not outweighed by the public benefit and long term consumer interests
1	Attachment 7.2A Addendum to Opex Business Case DBP05	3, 9, 10, 11	n/a	Opex	Unit cost information, Supplier information	Market sensitive cost inputs, personal information	Contains confidential unit cost information and identity of suppliers	A recipient of the business cases would be able to identify unit cost information turbine overhauls purchased for the DBNGP and the particular supplier. This information is confidential to us, and also to our suppliers, who may suffer detriment if the prices they have charged us become public information.	There is no public benefit in publication of our unit cost information and the identify of our suppliers. It is not necessary to understand the proposal because it is the overall RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure.
2	Attachment 8.5A Addendum to Capex Business Cases  Associated references in Attachment 8.11: Response to Draft Decision on Capex	Throughout	n/a	Capex	Unit cost information, supplier information, personal information including vehicle registration information	Market sensitive cost inputs, personal information	Contains confidential unit cost information. Contains confidential personal information such as vehicle registration information	A recipient of the business cases would be able to identify unit cost information about capital items purchased for the DBNGP. This information is confidential to us, and also to our suppliers, who may suffer detriment if the prices they have charged us become public information.	There is no public benefit in publication of our unit cost information and personal information. It is not necessary to understand the proposal because it is the overall RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure.

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								Disclosure of personal information related to that person/supplier may enable the identification of that person/supplier.	
3	Supporting information to Attachment 8.5A Addendum to Capex Business Cases (Updated NPV analysis for DBP10 and DBP22)	All tabs	n/a	Capex	Unit cost information, Personal information	Market sensitive cost inputs	Contains confidential unit cost information and personal information	A recipient of the business cases would be able to identify unit cost information about capital items purchased for the DBNGP. This information is confidential to us, and also to our suppliers, who may suffer detriment if the prices they have charged us become public information.	There is no public benefit in publication of our unit cost information and disclosure of personal information. It is not necessary to understand the cost analysis because it is the overall RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure.
4	Attachment 8.6A Capex forecast model	Capex calcs worksheet columns E-I, K-O	Volumes and unit rates	Capex	Unit cost information	Market sensitive cost inputs	Contains confidential unit cost information	A recipient of the model would be able to identify unit cost information about capital items purchased for the DBNGP. This information is confidential to us, and also to our suppliers, who may suffer detriment if the prices they have charged us become public information.	There is no public benefit in publication of our unit cost information. It is not necessary to understand the proposal because it is the overall RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure.

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	Attachment 10.2 Letter from Deloitte Tax Services Pty Ltd	all	n/a	Financing Costs	Our tax approach to capital expenditure	Other	Letter contains confidential information on our tax treatment of capital expenditure.	Along with our cost of debt, our tax practices are a key part of our commercial strategy and are commercially sensitive information	There is no public benefit or long term consumer interest in publication of our tax approach to capital expenditure, which is a key part of our commercial strategy. Publication of this information could potentially cause detriment to DBP
5	Attachment 9.6A Asset recategorisation model update	All	n/a	Capital Base	Unit cost information	Market sensitive cost inputs	Contains confidential unit cost information	A recipient of the model would be able to identify unit cost information about capital items purchased for the DBNGP. This information is confidential to us, and also to our suppliers, who may suffer detriment if the prices they have charged us become public information.	There is no public benefit in publication of our unit cost information. It is not necessary to understand the proposal because it is the overall RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure
6	Attachment 11.4 ACIL Allen "Gas Demand to Bunbury Natural Gas Pipeline"  Associated references in Attachment 11.3: Response to Draft	P .2-7	Section 2	Demand	Demand for Gas	Market sensitive cost inputs	Report contains detail of demand by shipper	A recipient would be able to identify individual shipper demand	There is no public benefit to understanding individual demand and publication of this information, private to each shipper, would be to their detriment. There is no public benefit or long term consumer interest in disclosure and potential detriment to third party shippers.

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	Decision: Demand								
7	Attachment 11.5 energyXL report  Associated references in Attachment 11.3: Response to Draft Decision: Demand	all	n/a	Demand	Demand for Gas	Market intelligence	Report contains detail of demand by shippers and description of shippers' commercial positions and strategies	A recipient would be able to identify the individual shippers, their demand and commercial strategy	There is no public benefit to understanding individual demand, commercial strategy and publication of this information, private to each shipper, would be to their detriment.  Publication of this information could also identify individual shippers and their commercial position.  Shipper commercial positions are not necessary to understand proposal related to demand  There is no public benefit or long term consumer interest in disclosure and potential detriment to third party shippers.

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8	Attachment 11.6 Statement of Jon Cleary, GM Commercial of AGIG and Attachments (schedules to full haul shipper contracts and peaker service contracts)  Associated references in Attachment 11.3: Response to Draft Decision: Demand	all	n/a	Demand	Demand for Gas, information regarding confidential contractual terms with shippers.	Market sensitive cost inputs, market intelligence, strategic information	Statement contains detail of demand by shipper, shipper strategies around contract negotiations, refers to confidential contractual arrangements with shippers	A recipient would be able to identify individual shipper demand.  The contractual arrangements are subject to confidentiality obligations under the contract with the shipper.	There is no public benefit to understanding individual demand and commercial drivers of shippers and DBP's recontracting status, and commercial strategy of parties. Publication of this information, private to each shipper, would be to their, and DBP's detriment. There is no public benefit or long term consumer interest in disclosure and may potential detriment to third party shippers and DBP.
9	Attachment 11.7 Shippers responses to questionnaire  Associated references in Attachment 11.3: Response to Draft Decision on Demand	all	n/a	Demand	Demand for Gas	Market sensitive cost inputs, market intelligence, strategic information	Responses contain individual shipper demand and their strategies around contract negotiations	A recipient would be able to identify individual shipper demand.	There is no public benefit to understanding individual demand and commercial drivers of shippers and DBP's recontracting status, and commercial strategy of the parties. Publication of this information, private to each shipper, would be to their, and DBP's detriment. There is no public benefit or long term consumer interest in disclosure and potential detriment to third party shippers and DBP.

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10	Attachment 13.1A Tariff Model	all	n/a	Tariffs	Demand for Gas	Market sensitive cost inputs	Model contains detail of demand by shipper	A recipient of the model would be able to identify individual demand for each shipper, including by competitors, potentially causing detriment to third party shippers. Additionally, there is some information tied to unit costs (as per Attachment 9.6), but individual demand information is the key issue.	There is no public benefit to understanding individual demand and publication of this information, private to each shipper, would be to their detriment. There is no public interest or long term consumer interest in disclosure and potential detriment to third party shippers and DBP.
11	Attachments: 6.2 Pipeline and Reference services (DC) , 13.2 Allocation of total revenue (CI), 14.1B Response to Draft Decision on Pipeline Access (CI)	Attachment 6.2: All  Attachment 13.2: p.7  Attachment 14.1B: pp.12-16	Attachment 6.2: All  Attachment 13.2: section 1.3.3  Attachment 14.1B: section 1.3.3	Non-reference service	Confidential information about a proposed non-reference service that, if disclosed is likely to reveal the identity of the shipper and their requirements.	Strategic information Personal Information,	The shipper does not give consent for this information to be made public.  Information contains individual shipper demand and their strategies around contract negotiations	The shipper does not give consent for this information to be made public.  A recipient would be able to identify the individual shipper potentially causing detriment.  Our discussions with the shipper on service requirements, including commercial strategies are ongoing and is commercially sensitive.	There is no public benefit to understanding individual commercial drivers and strategies of the parties. Publication of this information, private to the shipper to DBP, would be detrimental. There is no public benefit or long term consumer interest in disclosure and potential detriment to the shipper and DBP.