

Goldfields Gas Pipeline 2025-29 Access Arrangement proposal

Claim for confidentiality

1 January 2024



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1. Introduction

Goldfields Gas Transmission has submitted a proposal for the revision of the Goldfields Gas Pipeline access arrangement. The proposal is for the five-year period from 1 January 2025 to 31 December 2029.

GGT is claiming confidentiality for some supporting information submitted with the proposed revisions.

Chapter 10, Part 2 of the National Gas Law contains provisions for the handling of confidential information. Part 16 of the National Gas Rules contains provisions relating confidential information including Rule 137 which requires that a scheme pipeline service provider must not disclose relevant confidential information; or use relevant confidential information for a purpose other than the purpose for which the information was given to the service provider. This is relevant to claims for confidentiality relating to customer information.

We have also been guided by the requirements set out in the Economic Regulation Authority's Gas Access Arrangement Guideline - A procedural guideline for the economic regulation of Western Australian gas pipelines (July 2022).

In considering the claim for confidentiality we have sought to minimise the amount of confidential information. We understand the importance of transparency and providing the information to enable greater understanding of our proposal.

Attachment 1: Claim for confidentiality

Title, page and paragraph number of document containing the confidential information	Description of the confidential information.	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Identify the recognised confidentiality category that the confidential information falls within.	Provide a brief explanation of why the confidential information falls into the selected category.	Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
Demand forecast model (filename GGP- AA5-Demand forecast model-1 January 2024- Confidential Tab 3. Capacity by customer Tab 4. Throughput by customer	Commercial in confidence – details of individual customers	Demand forecast information for individual customers	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities) Other (information which the NSP claims is confidential but does not fit into one of the above categories)	Market intelligence – GGT's competitors would have visibility of the terms on which we have contracted with our customers. For example, trucked LNG and trucked diesel providers are competitors to GGT. Other - Customer specific information (contracting entities, agreement Term information, contracted capacity). This information is confidential information in accordance with Part 16 of the National Gas Rules. Rule 137 requires that a scheme pipeline service provider must not: (a) disclose relevant confidential information; or(b) use relevant confidential information for a purpose other than the purpose for which the information was given to the service provider.	Detriment to GGT – result in breach of contract, loss of customer confidence in GGT, GGT's competitors gaining access to sensitive contract information increasing risk of loss of revenue. Detriment to GGT's customers – competitors may be able to determine operational requirements for GGT customers activities.	Disclosure of the identified information would cause GGT to be in breach of its commercial agreements. Publication of individual customer information likely to be detrimental to customers. This information is not in the long-term interest of consumers. The significant detriment is not outweighed by the public benefit.



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GGP-AA5-Attachment 6.1-Cost allocation method-1 January 2024-Confidential. Section 8, page 27	The percentage of shared corporate expenditure allocated to covered portion of GGP.	Security of Critical Infrastructure – capex and opex	Information affecting the security of the network (information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network).	The Security of Critical Infrastructure Act 2018 (the SOCI Act) limits the use and disclosure of protected information as defined within the Act. For a summary refer to <u>Protected information</u> (cisc.gov.au) Claiming confidentiality for the cost allocation percentage to prevent disclosure of the size of APA's SoCI program and the total GGP SoCI program.	The information identified as confidential can affect the security of the GGP and result in disruptions to supplies to customers. APA (which owns GGP) is Australia's largest natural gas infrastructure business with a broad portfolio of energy assets. GGP has a high degree of interconnectedness with other industries and services. Impacts to GGP from disruptions would have broader impact and ramifications across the economy and society. There is a risk of comparable recent global events to result in significant financial and operational impacts and consequences for GGP.	The identified detriment risks significant security and reliability of services. Disruptions would have broader impact and ramifications across the economy and society The detriment is not outweighed by the public benefit. Cost allocation method has oversight by the ERA. There is no public benefit of this information being disclosed. The only interested / beneficial parties are those seeking to disrupt and cause a cyber event. Publication of information is not in the long-term interest of consumers.



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Cost allocation model GGP-AA5-Attachment 6.2-Cost allocation model-1 January 2024- Confidential	Commercial in confidence – details of individual customers	Demand forecast information for individual customers	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities) Other (information which the NSP claims is confidential but does not fit into one of the above categories)	Market intelligence – GGT's competitors would have visibility of the terms on which we have contracted with our customers. For example, trucked LNG and trucked diesel providers are competitors to GGT. Other - Customer specific information (contracting entities, agreement Term information, contracted capacity). This information is confidential information in accordance with Part 16 of the National Gas Rules	Detriment to GGT – result in breach of contract, loss of customer confidence in APA, APA's competitors gaining access to sensitive contract information increasing risk of loss of revenue. Detriment to GGT's customers – competitors may be able to determine operational requirements for GGT customers activities.	Disclosure of the identified information would cause GGT to be in breach of its commercial agreements. The significant detriment is not outweighed by the public benefit. Publication of information is not in the long-term interest of consumers.



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GGP Tariff model GGP-AA5-Tariff model- 1 January 2024- Confidential Tabs Load Yarraloola Tabs Load NGI	Commercial in confidence – details of individual customers	Demand forecast and receipt point information for individual customers	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities) Other (information which the NSP claims is confidential but does not fit into one of the above categories)	Market intelligence – GGT's competitors would have visibility of the terms on which we have contracted with our customers. For example, trucked LNG and trucked diesel providers are competitors to GGT. Other - Customer specific information (contracting entities, agreement Term information, contracted capacity). This information is confidential information in accordance with Part 16 of the National Gas Rules. Rule 137 requires that a scheme pipeline service provider must not: (a) disclose relevant confidential information; or(b) use relevant confidential information for a purpose other than the purpose for which the information was given to the service provider.	Detriment to GGT – result in breach of contract, loss of customer confidence in GGT, GGT's competitors gaining access to sensitive contract information increasing risk of loss of revenue. Detriment to GGT's customers – competitors may be able to determine operational requirements for GGT customers activities.	Disclosure of the identified information would cause GGT to be in breach of its commercial agreements. Publication of individual customer information likely to be detrimental to customers. This information is not in the long-term interest of consumers. The significant detriment is not outweighed by the public benefit.



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Safeguard Mechanism option analysis and forecast model GGP-AA5- Attachment 13.1-Safeguard Mechanism Forecast-1 January 2024- Confidential	Forecast price of Australian Carbon Credit Units (ACCUs).	Opex. Forecast opex step change for meeting Safeguard Mechanism obligations.	Other (information which the NSP claims is confidential but does not fit into one of the above categories) Intellectual property of RepuTex Energy.	RepuTex provide data for the carbon market through a paid subscription service. APA has a contract with RepuTex for the provision of forecast price of carbon offsets. The figures used are RepuTex's intellectual property and not to be disclosed publicly. We have received permission from RepuTex to disclose the information to the ERA only.	May result in breach of contract as we do not have the rights to share this information. Publication of ACCU prices would be detrimental to our supplier RepuTex. Payment by subscribers is Reputex's business model. Disclosure of the information would result in financial and reputational harm to Reputex.	Disclosure of the identified information would cause APA to be in breach of the terms and conditions it has signed up to when receiving this pricing from RepuTex. There are other sources of information a carbon costs offsets. There is no public benefit of disclosing this information.
GGP SoCI program GGP-AA5-SoCI operations business case -1 January 2024- Confidential	Commercial in Confidence information relating to APA/GGT's Security of Critical Infrastructure vulnerabilities and remediation program	Security of Critical Infrastructure Capital expenditure Operating expenditure	Information affecting the security of the network (Information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network).	The Security of Critical Infrastructure Act 2018 (the SOCI Act) limits the use and disclosure of protected information as defined within the Act. For a summary refer to <u>Protected information</u> (cisc.gov.au) The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGT's critical infrastructure	The information identified as confidential can affect the security of the GGT and result in disruptions to supplies to customers. APA (which owns GGT) is Australia's largest natural gas infrastructure business with a broad portfolio of energy assets. GGT has a high degree of interconnectedness with other industries and services. Impacts to GGT from disruptions would have broader	The identified detriment risks significant financial and operational impacts and consequences for GGT impacts. Disruptions would have broader impact and ramifications across the economy and society The significant detriment is not outweighed by the public benefit. Publication of information is not in the long-term interest of consumers.



Title, page and paragraph number of document containing the confidential information	Description of the confidential information.	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Identify the recognised confidentiality category that the confidential information falls within.	Provide a brief explanation of why the confidential information falls into the selected category.	Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit
				assets, systems, supply chain and personnel	impact and ramifications across the economy and society. There is a risk of comparable recent global events to result in significant financial and operational impacts and consequences for GGT.	
GGP-AA5-Attachment 10.14-SIB business case - Physical security-1 January 2024-Confidential	Information concerning the physical security of GGT's assets.	Critical Infrastructure Security Capital expenditure	Other (information which the NSP claims is confidential but does not fit into one of the above categories)	The Security of Critical Infrastructure Act 2018 (the SOCI Act) limits the use and disclosure of protected information as defined within the Act. For a summary refer to <u>Protected information</u> (cisc.gov.au) The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGT's critical infrastructure	The information identified as confidential can affect the security of GGT assets and result in disruptions to supply to the customer. Physical security of GGT assets being compromised would pose a danger not only to GGT but to customers and anyone connected to the GGP – nature of transmission pipelines means that consequences due to incidents might not be isolated.	Disclosure risks potentially breaching the SoCI 2018 Act. The identified detriment risks significant security, safety, and operational impacts for personnel and the public. Disruptions would have broader impact and ramifications across the economy and society. The significant detriment significantly outweighs any public benefit. Publication of Secure Energy information is not in the long-term interest of consumers.



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GGP-AA5-Attachment 10.1-Capital expenditure attachment-1 January 2024-Confidential Page 28	Information concerning the physical security of GGT's assets.	Critical Infrastructure Security Capital expenditure Operating expenditure	Other (information which the NSP claims is confidential but does not fit into one of the above categories)	The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGTS's critical infrastructure assets, systems, supply chain and personnel	The information identified as confidential can affect the security of GGT assets and result in disruptions to supply to the customer. Physical security of GGT assets being compromised would pose a danger not only to GGT but to customers and anyone connected to the GGP – nature of transmission pipelines means that consequences due to incidents might not be isolated.	The identified detriment risks significant financial and operational impacts and consequences for GGT impacts. Disruptions would have broader impact and ramifications across the economy and society The significant detriment is not outweighed by the public benefit. Publication of information is not in the long-term interest of consumers.
GGP-AA5-Attachment 10.3-Capital expenditure coverage allocation model-1 January 2024- Confidential	Includes information relating to specific customers	Сарех	Market intelligence	Information on costs relating to specific customers.	Our customers operate in a competitive market and providing this information publicly may provide an advance to their competitors. It may also be detrimental to GGT as it increases the knowledge of our competitors.	No public benefit has been identified which could outweighs the detriment.



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GGP-AA5- Attachment 10.4- ITOT plan-1 January 2024-Confidential	Information Technology and Operational Plan	Capex Opex	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities) Information affecting the security of the network (Information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network).	Market intelligence - Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers. Information affecting the security of the network – The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGT's critical infrastructure	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs. The information identified as confidential can affect the security of the GGP and result in disruptions to supplies to customers.	No known public benefit of disclosing this information outweighs the identified detriments. The only interested / beneficial parties are those seeking to disrupt and cause a cyber event.
GGP-AA5-Attachment 10.5-ITOT architecture vision-1 January 2024- Confidential	IT architecture plan	Capex Opex	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities) Information affecting the security of the network (Information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network).	Market intelligence - Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers. Information affecting the security of the network – The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGT's critical infrastructure	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs. The information identified as confidential can affect the security of the GGP and result in disruptions to supplies to customers.	No known public benefit of disclosing this information outweighs the identified detriments. The only interested / beneficial parties are those seeking to disrupt and cause a cyber event.



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GGP-AA5-Attachment 10.6-Technology enablement program - Business showcase-1 January 2024- Confidential	Technology enablement program	Capex Opex	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities) Information affecting the security of the network (Information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network).	Market intelligence - Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers. Information affecting the security of the network – The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGT's critical infrastructure	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs. The information identified as confidential can affect the security of the GGP and result in disruptions to supplies to customers.	No known public benefit of disclosing this information outweighs the identified detriments. The only interested / beneficial parties are those seeking to disrupt and cause a cyber event.
GGP-AA5-Attachment 10.8-Asset management performance and lifecycle plan-1 January 2024- Confidential Page 23	Information concerning the security of GGT's assets.	Critical Infrastructure Security Capital expenditure Operating expenditure	Other (information which the NSP claims is confidential but does not fit into one of the above categories)	The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGTS's critical infrastructure assets, systems, supply chain and personnel	The information identified as confidential can affect the security of GGT assets and result in disruptions to supply to the customer. Physical security of GGT assets being compromised would pose a danger not only to GGT but to customers and anyone connected to the GGP – nature of transmission pipelines means that consequences due to incidents might not be isolated.	The identified detriment risks significant financial and operational impacts and consequences for GGT impacts. Disruptions would have broader impact and ramifications across the economy and society The significant detriment is not outweighed by the public benefit. Publication of information is not in the long-term interest of consumers.



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GGP-AA5-Attachment 10.8-Asset management performance and lifecycle plan-1 January 2024- Confidentia Page 32	Brand of specific equipment	Сарех	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.
All SIB Business cases Document control: review and approvals	Employees	Personal information	Other	Information directly identifies employees and their activities	Disclosure of personal information is unnecessary. Names of personnel and their roles could be used by external parties for harmful activities including activists.	No public benefit has been identified by disclosing this information



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GGP-AA5-Attachment 10.9-Asset management presentation-1 January 2024-Confidential	Presentation to ERA about asset management processes and the SoCI program	Capex Opex Personal information	Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities). Strategic information about asset management and SoCI. Information affecting the security of the network (Information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network) Personal information 0 names of key personnel.	Market intelligence - Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers. Information affecting the security of the network – The information may affect GGT's ability to maintain the integrity, availability, integrity, reliability of GGT's critical infrastructure	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs. The information identified as confidential can affect the security of the GGP and result in disruptions to supplies to customers.	No known public benefit of disclosing this information outweighs the identified detriments. The only interested / beneficial parties are those seeking to disrupt and cause a cyber event.
GGP-AA5-Attachment 10.10-SIB business case - In-line inspection-1 January 2024-Confidential Page 16 and page 18	Cost estimate details	Сарех	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.



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GGP-AA5-Attachment 10.10-SIB business case - In-line inspection-1 January 2024-Confidential Page 14	Details on vendor product performance	Сарех	Strategic information	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.
GGP-AA5-Attachment 10.10.1-SIB business case - In-line inspection-NPV model- 1 January 2024- Confidential	Cost estimate details	Сарех	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.



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GGP-AA5-Attachment 10.11-SIB business case Rotating equipment major maintenance-1 January 2024- Confidential Page 5, 6, 8, 10, 11, 12, 16, 20	Details on current suppliers, brand of equipment and cost estimates	Сарех	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.
GGP-AA5-Attachment 10.13.1-SIB business case Wiluna wet seals- 1 January 2024- Confidential Page 5	Brand of specific equipment	Capex	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.



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GGP-AA5-Attachment 10.13.1-SIB business case Wiluna wet seals- 1 January 2024- Confidential Page 6	3 rd party information	Сарех	Personal information	This information identifies information on the operation of downstream infrastructure.	Disclosure of this information could affect the competitive position of downstream infrastructure service providers.	No known public benefit of disclosing this information outweighs the identified detriments.
GGP-AA5-Attachment 10.13.1-SIB business case Wiluna wet seals- 1 January 2024- Confidential Page 7	Cost estimate details	Сарех	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.



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GGP-AA5-Attachment 10.13.1-SIB business case - Wiluna wet seals-NPV model-1 January 2024- Confidential	Intellectual property of APA's supplier RepuTex Energy	ACCU prices, intellectual property of supplier	Other (information which the NSP claims is confidential but does not fit into one of the above categories)	RepuTex provide data for the carbon market through a paid subscription service, and therefore the figures used are RepuTex's intellectual property and not to be disclosed publicly.	Detriment to APA (GGT is a subsidiary) – may result in breach of contract as we do not have the rights to share this information. Publication of ACCU prices would create competition against our supplier RepuTex and providing such information at cost is their business model.	Disclosure of the identified information would cause APA to be in breach of the terms and conditions it has signed up to when receiving this pricing from RepuTex.
GGP-AA5-Attachment 10.15-SIB business case - GEA replacement program- 1 January 2024- Confidential Page 6, page 8	Brand of specific equipment	Сарех	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.



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GGP-AA5-Attachment 10.15-SIB business case - GEA replacement program- 1 January 2024- Confidential Page 8	Intellectual property of APA's supplier RepuTex Energy	ACCU prices, intellectual property of supplier	Other (information which the NSP claims is confidential but does not fit into one of the above categories)	RepuTex provide data for the carbon market through a paid subscription service, and therefore the figures used are RepuTex's intellectual property and not to be disclosed publicly.	Detriment to APA (GGT is a subsidiary) – may result in breach of contract as we do not have the rights to share this information. Publication of ACCU prices would create competition against our supplier RepuTex and providing such information at cost is their business model.	Disclosure of the identified information would cause APA to be in breach of the terms and conditions it has signed up to when receiving this pricing from RepuTex.
GGP-AA5-Attachment- ITOT plan-1 January 2024-Confidential Pages: • 25 to 26 (section 6.3) and • 27 to 28 (section 6.5)	 6.3 - Options Identification and assessment 6.5 - Risk Measures and Corporate Risk appetite 	Capex and opex	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.



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GGP-AA5-Attachment 11.2-AA6 regulatory proposal expenditure- 1 January 2024- Confidential	Proposed incremental costs of undertaking 2030-34 (AA6) access arrangement proposed revision.	Opex	Market sensitive cost inputs	Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers. For example, economic consultants, legal, and project management.	Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.	No known public benefit of disclosing this information outweighs the identified detriments.