

Revised Final Plan
Attachment 1.4A

Confidentiality Claims

August 2025

PUBLIC



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 7.2 – Pipeline and Reference Services	6-9, 10	Section 1.4.1, Section 1.4.2	SUG use	Shows detail on actual SUG use and prices	Market sensitive cost inputs	As it shows the actual amount of SUG used daily, as well as prices	It would give away highly sensitive information about how we run our pipeline, which would be very valuable to competing pipelines elsewhere	Shippers gain no value from knowing precisely how much SUG is used, so there is no countervailing benefit.
2	Attachment 7.2 – Pipeline and Reference Services	12-13	Section 1.4.1, Section 1.4.2	Customer demand	Shows detail on demand for services by individual shippers	Customer sensitive inputs	As it provides detail on specific things we do to respond to specific issues our shippers have.	Shippers would suffer hardship if details on their issues were made public	There is no benefit from other shippers knowing the issues their peers face.
3	Attachment 7.2 – Pipeline and Reference Services	17-19	Section 1.4.1, Section 1.4.2	SUG use	Shows detail on SUG use	Market sensitive inputs	As it shows in fine detail how we manage our pipeline	It would give away information which is commercially sensitive to use.	There is no benefit for shippers in knowing the fine-grained detail on how we run the pipeline.
4	Attachment 8.7: Salary Expenses	All	n/a	Opex	Staff remuneration	Staff remuneration details	Contains confidential remuneration information	Disclosure would give external parties access to confidential remuneration data, potentially leading to internal and external benchmarking, poaching of staff, and undermining of salary negotiations. It could also damage	There is no clear public benefit in publishing detailed staff remuneration information. Disclosure would not enhance transparency in a way that supports consumer interests but rather risks compromising internal business operations and staff

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								employee relations if salary disparities are misinterpreted without full context.	privacy.
5	Attachment 8.4A Forecast Insurance Expenses	All	n/a	Opex	Insurance premium information	Market sensitive cost inputs	Contains confidential unit cost information	A recipient of the insurance expense would be able to identify unit cost information about 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 or consumer benefit in disclosing detailed unit cost information related to insurance expenses. Such information does not enhance transparency in a meaningful way for consumers and may instead harm commercial interests without delivering any long-term value to the public.
6	Attachment 8.8: Electricity Cost	All	n/a	Opex	Electricity cost	Market sensitive cost inputs	Contains confidential unit cost information related to electricity supply	Disclosure would allow recipients to identify unit cost information for electricity purchased for the DBNGP. This information is confidential to both the business and its electricity suppliers. Public release could negatively impact supplier relationships and future	There is no public benefit in publication of our unit cost information. There is no public benefit or long term consumer interest in disclosure.

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								procurement negotiations and may also lead to competitive disadvantage if pricing structures are exposed.	
7	9.6A Revised final plan Capex forecast model	Capex calcs historical included worksheet columns G-K, M-Q, AK-AO, AQ-AU	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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8	<p>9.12 Response to draft decision – OneERP</p> <p>Appendix A KPMG ERP benchmarking report</p> <p>Appendix B Advice on OneERP delivery – R de Fonseca</p>	<p>All</p> <p>All</p> <p>All</p>	N/A	Capex	Cost information, Supplier information	Market sensitive cost inputs	Contains commercially sensitive information	The document contains details on the costs of undertaking specific works, including services procured from external provider.	Public disclosure of this information could materially increase actual capital expenditure in the future, as suppliers may adjust their pricing based on knowledge of previously incurred costs. This would undermine our ability to obtain competitive pricing, leading to higher future costs and, ultimately, increased prices for consumers.

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9	9.12 Response to draft decision – Jandakot Facility Redevelopment	pp. 5, 6,9-12,14,16	Section 2.2	Capex	Cost information, Supplier information	Market sensitive cost inputs and operational & cyber security risk	Contains commercially sensitive information regarding the lease and business security related information	<p>The document contains details on the costs of office lease. Publishing the material may prejudice future commercial negotiation processes between DBP and potential suppliers.</p> <p>To protect critical assets by restricting the disclosure of sensitive information that could increase the risk of cyber or physical attacks on essential operational and IT systems.</p>	<p>Disclosure of the identified information could significantly harm DBP's legitimate commercial interests by exposing sensitive cost, which may undermine our competitive position and impact future negotiations or procurement processes. This could lead to inefficiencies and increased operational costs, which are ultimately borne by consumers.</p> <p>Moreover, as the operator of critical gas transmission infrastructure, DBP has a responsibility to protect information that could be linked to the security and integrity of our network. Disclosing certain details may inadvertently increase vulnerabilities or risks, which would not be in the public interest.</p>
	Appendix A Workforce Transition Plan	All	N/A						
	Appendix D Level 23 cost reduction	All	N/A						

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10	9.12 Response to draft decision – Corporate IT Sustaining Apps	pp. 6, 8, 9, 17, 22, 23, 31, 32	Section 1.2.1.2, Section 1.2.2, Section 1.2.2.3.1, Section 1.2.3.1.1, Section 1.2.3.1.2, Section 1.2.4.2	Capex, Opex	Cost information, Supplier information	Market sensitive cost inputs and operational & cyber security risk	The material contains specific vendor names and market sensitive information and IT security information	The document contains detailed information on costs and suppliers. Publishing this material could compromise DBP's position in future tenders and commercial negotiations with current and potential suppliers. Additionally, the document includes sensitive information related to critical infrastructure. Disclosure of this information could increase cybersecurity vulnerabilities, posing a risk to the integrity and security of our IT systems and operational assets.	Public disclosure of this information could materially increase actual capex & opex expenditure in the future, as suppliers may adjust their pricing based on knowledge of previously incurred costs. This would undermine our ability to obtain competitive pricing, leading to higher future costs and, ultimately, increased prices for consumers.

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11	9.12 Response to draft decision – IT Sustaining Infrastructure	pp. 6,7,8	Section 1.2.2, Section 1.2.3.1	Capex, Opex	Cost information, operational & cyber security risk related information	Market sensitive cost inputs and operational & cyber security risk	The material contains market sensitive information and IT security information	The document contains detailed information on costs and suppliers. Publishing this material could compromise DBP's position in future tenders and commercial negotiations with current and potential suppliers. Additionally, the document includes sensitive information related to critical infrastructure. Disclosure of this information could increase cybersecurity vulnerabilities, posing a risk to the integrity and security of our IT systems and operational assets.	Public disclosure of this information could materially increase actual capex & opex expenditure in the future, as suppliers may adjust their pricing based on knowledge of previously incurred costs. This would undermine our ability to obtain competitive pricing, leading to higher future costs and, ultimately, increased prices for consumers.

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12	9.12 Response to the draft decision - Turbine Exhaust Replacement	pp. 2	Section 1.2	Capex	Cost information, Supplier information	Commercial sensitive inputs	The material contains specific vendor names and market sensitive information	The document contains detailed information on suppliers and costs. Publishing this material could compromise DBP's position in future tenders and commercial negotiations with current and potential suppliers.	Public disclosure of this information could materially increase actual capex expenditure in the future, as suppliers may adjust their pricing based on knowledge of previously incurred costs. This would undermine our ability to obtain competitive pricing, leading to higher future costs and, ultimately, increased prices for consumers.
13	Attachment 13.3 - Demand	8,9,10,11,13-14,15,16,17	Section 1.4.1, Section 1.4.2, Section 1.4.3, and Section 1.4.5	Demand	Shows detail which enables the reader to obtain details on individual shipper demand	Customer sensitive inputs	It is detail on the contracts, including demand, of individual shippers	Shippers would suffer hardship if details on their particulars were made public	There is no benefit from other shippers knowing about the detail of their peers' demand and contracts.

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14	Attachment 13.3 - Demand	12-13	Section 1.4.4 and Section 1.4.5	Pipeline operations	Shows detail on aspects of how we manage the pipeline	Market sensitive inputs	It provides detail on our views of particular risks	If known, shippers could use this in negotiations	There is no benefit from other shippers knowing about the detail of their peers' demand and contracts.
15	Attachment 14.1A 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 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.