

Attachment 1.4

# Confidentiality Claims

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January 2020



Dampier Bunbury  
Pipeline

# 1. Introduction

Where possible, we have relied upon non-confidential information in the 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 Final Plan, attachments and proposed revisions to the Access Arrangement Document.

Table 1: DBNGP 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 Opex Business Cases	16, 17, 20, 21, 23, 28, 30, 33-35, 38, 41-45, 54, 57, 62, 66, 70, 75, 77, 80, 94	n/a	Opex	Unit cost information	Market sensitive cost inputs	Contains confidential unit cost information	A recipient of the business cases 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 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.
2	Attachment 7.3 Market Gas Cost assessment	all	n/a	Opex	Unit cost information-contained in consultant report.	Market sensitive cost inputs	Contains confidential unit cost information	Includes wholesale gas price and demand information about third parties. This information is confidential to us, and also to our supplier, and could cause detriment to third parties.	There is no public benefit in disclosing this information. Unit costs are not necessary to understand the proposal. The relevant information is available in aggregated form. There is no

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									public benefit or long term consumer interest in disclosure.
3	Attachment 7.4 Expenditure Reclassification Review	9,10	n/a	Opex	Asset Inspection Costs	Market sensitive cost inputs	Contains confidential cost information	A recipient of the attachment would be able to identify unit cost information about inspection activities 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 disclosing this information. Unit costs are not necessary to understand the proposal. The relevant information is available in aggregated form. There is no public benefit or long term consumer interest in disclosure.
4	Attachment 8.1 Asset Management System Framework	all	n/a	asset management	Detailed asset management information	Strategic information	Contains details of how we manage and operate assets	A recipient would be able to identify unique strategy, management plans, and asset specific details including engineering and design, which could be used for competitive	Individual business cases provide details to demonstrate that expenditure is prudent and efficient and in the long-term interests of consumers.

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								advantage or to the detriment of asset security. Contents appropriate for public release have been included in the Final Plan, specifically in Chapters 7 and 8.	Publication of this information is not necessary to understand the proposal and there is no public benefit or long term consumer interest in disclosing asset specific details.
5	Attachment 8.2 Asset Management Plan General	all	n/a	asset management	Detailed asset management information	Strategic information	Contains details of how we manage and operate assets	A recipient would be able to identify unique strategy, management plans, and asset specific details including engineering and design, which could be used for competitive advantage or to the detriment of asset security. Contents appropriate for public release have been included in the Final Plan, specifically in Chapters 7 and 8.	Individual business cases provide details to demonstrate that expenditure is prudent and efficient and in the long-term interests of consumers. Publication of this information is not necessary to understand the proposal and there is no public benefit or long term consumer interest in disclosing asset specific details.

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6	Attachment 8.3 Safety Case	all	n/a	asset management and safety	Detailed asset management information	Strategic information	Contains details of how we manage and operate assets	A recipient would be able to identify unique strategy, management plans, and asset specific details including engineering and design, which could be used for competitive advantage or to the detriment of asset security. Contents appropriate for public release have been included in the Final Plan, specifically in Chapters 7 and 8.	Individual business cases provide details to demonstrate that expenditure is prudent and efficient and in the long-term interests of consumers. Publication of this information is not necessary to understand the proposal and there is no public benefit or long term consumer interest in disclosing asset specific details.
7	Attachment 8.5 Capex Business Cases	Throughout	n/a	Capex	Unit cost information	Market sensitive cost inputs	Contains confidential unit cost 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	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

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								charged us become public information.	long term consumer interest in disclosure.
8	Attachment 8.6 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.
9	Attachment 8.7 Cost estimation methodology	all	n/a	Capex	Unit cost information	Market sensitive cost inputs	Contains confidential unit cost information	A recipient of the attachment would be able to identify cost estimation information for the DBNGP. This information is confidential to us, and also to our	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

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								suppliers, who may suffer detriment if the prices they have charged us become public information.	RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure.
10	Attachment 8.8 Operational Risk Management Framework	Risk model page 1	Risk model consequence definitions	Risk management	Definitions used in risk assessment regarding financial, health, safety and reputational impacts	Other	Contains commercially sensitive information regarding the assessment of qualitative risks	Information in the attachment could be used for competitive advantage or to the detriment of security and safety because it describes how certain risks are assessed and categorised based on their impact on DBP, people, the environment, supply, loss, etc.	Specific consequence definitions are not required to understand the governance process in place to assess and manage risk for expenditure proposals. This information is not necessary to understand the proposal and there is no public benefit or long term consumer interest in disclosure.



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11	Attachment 9.2 Assessment of the economic life of the DBNGP	26	Table 2	Capital Base	Demand for Gas	Market sensitive cost inputs	It is related to shipper demand forecasts	Demand forecast is by commodity, but, where there are small numbers of shippers with the same commodity, competitors may be able to back-solve demand for each shipper, potentially causing detriment to shippers.	Report covers overall depreciation. The information regarding sector-by-sector demand is not required to understand the depreciation approach proposed. There is no public benefit or long term consumer interest in disclosure and potential detriment to third party shippers.
12	Attachment 9.3 ACIL Allen Economic Depreciation Study	6	Table 3.1	Capital Base	Demand for Gas	Market sensitive cost inputs	It is related to shipper demand forecasts	Demand forecast is by commodity, but, where there are small numbers of shippers with the same commodity, competitors may be able to back-solve demand for each shipper, potentially causing detriment to shippers.	Report covers overall depreciation. The information regarding sector-by-sector demand is not required to understand the depreciation approach proposed. There is no public benefit or long term consumer

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									interest in disclosure and potential detriment to third party shippers.
13	Attachment 9.3 ACIL Allen Economic Depreciation Study	7	Under heading 3.1	Capital Base	Demand for Gas	Market sensitive cost inputs	It is related to shipper demand forecasts	Demand forecast is by commodity, but, where there are small numbers of shippers with the same commodity, competitors may be able to back-solve demand for each shipper, potentially causing detriment to shippers.	Report covers overall depreciation. The information regarding sector-by-sector demand is not required to understand the depreciation approach proposed. There is no public benefit or long term consumer interest in disclosure and potential detriment to third party shippers.

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14	Attachment 9.3 ACIL Allen Economic Depreciation Study	8	para 2	Capital Base	Demand for Gas	Market sensitive cost inputs	It is related to shipper demand forecasts	Demand forecast is by commodity, but, where there are small numbers of shippers with the same commodity, competitors may be able to back-solve demand for each shipper, potentially causing detriment to shippers.	Report covers overall depreciation. The information regarding sector-by-sector demand is not required to understand the depreciation approach proposed. There is no public benefit or long term consumer interest in disclosure and potential detriment to third party shippers.
15	Attachment 9.3 ACIL Allen Economic Depreciation Study	11	1	Capital Base	Profitability	Market sensitive cost inputs	It refers to the profitability of one of our shippers and may be confidential	Disclosure of information regarding profitability of a third party shipper may adversely impact that third party and its competitive position.	The information is not necessary to understand the access arrangement proposal. There is no public benefit or long term consumer interest in disclosure and potential detriment to the third party shipper.

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16	Attachment 9.3 ACIL Allen Economic Depreciation Study	12	2	Capital Base	Demand for Gas	Market sensitive cost inputs	It is related to shipper demand forecasts	Demand forecast is by commodity, but, where there are small numbers of shippers with the same commodity, competitors may be able to back-solve demand for each shipper, potentially causing detriment to shippers.	Report covers overall depreciation. The information regarding sector-by-sector demand is not required to understand the depreciation approach proposed. There is no public or long term consumer interest in disclosure and potential detriment to third party shippers.
17	Attachment 9.5 WOOPS Modelling (3 versions)	all	n/a	Capital Base	Demand for Gas	Market sensitive cost inputs	The models contain shipper demand forecasts within them, linked to individual shippers	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.	Report covers overall depreciation. The information regarding sector-by-sector demand is not required to understand the depreciation approach proposed. There is no public benefit or long term consumer

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									interest in disclosure and potential detriment to third party shippers.
18	Attachment 9.6 Asset recategorisation model	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.
19	Attachment 11.2 ACIL Allen demand report	all	n/a	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

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									be to their detriment. There is no public benefit or long term consumer interest in disclosure and potential detriment to third part shippers.
20	Attachment 11.1 KPMG demand report	all	n/a	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 part shippers and DBP.

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21	Attachment 13.1 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 part shippers and DBP.
22	Attachment 14.1 Further information on our proposed changes to Reference Service terms and conditions	103	20.8-20.9	Reference Service terms and conditions	Information regarding confidential contractual terms with a shipper.	Other	Refers to confidential contractual arrangements with a shipper	The contractual arrangements are subject to confidentiality obligations under the contract with the shipper. The relevant paragraphs contain confidential information about the contractual arrangements and rights and obligations under the contract.	The paragraphs containing information regarding contractual arrangements are not necessary to understand the proposed amendment to clause 28.3(b) of the terms and conditions. There is no

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									public or long term consumer interest in disclosure and potential detriment due to confidentiality obligations.