



Goldfields Gas Pipeline

2025-29 Access Arrangement revised proposal

Claim for confidentiality

5 September 2024



1. Introduction

Goldfields Gas Transmission has submitted a revised proposal for the revision of the Goldfields Gas Pipeline access arrangement. The revised 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
<p>Tariff model</p> <p>Filename: GGP AA5 Tariff model - Confidential</p> <p>Tabs Load Yarraloola</p> <p>Tabs Load NGI</p>	<p>Commercial in confidence – details of individual customers</p>	<p>Demand forecast and receipt point information for individual customers</p>	<p>Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities)</p> <p>Other (information which the NSP claims is confidential but does not fit into one of the above categories)</p>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Detriment to GGT's customers – competitors may be able to determine operational requirements for GGT customers activities.</p>	<p>Disclosure of the identified information would cause GGT to be in breach of its commercial agreements.</p> <p>Publication of individual customer information likely to be detrimental to customers. This information is not in the long-term interest of consumers.</p> <p>The significant detriment is not outweighed by the public benefit.</p>



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<p>Demand forecast supplementary information</p> <p>Filename: Demand forecast supplementary information – Confidential</p> <p>Entire attachment</p>	<p>Commercial in confidence – details of individual customers</p>	<p>Demand forecast for individual customers and potential new customers</p>	<p>Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities)</p> <p>Other (information which the NSP claims is confidential but does not fit into one of the above categories)</p>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Detriment to GGT's customers – competitors may be able to determine operational requirements for GGT customers activities.</p>	<p>Disclosure of the identified information would cause GGT to be in breach of its commercial agreements.</p> <p>Publication of individual customer information likely to be detrimental to customers. This information is not in the long-term interest of consumers.</p> <p>The significant detriment is not outweighed by the public benefit.</p>



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<p>Demand forecast model</p> <p>Filename: GGP AA5 Attachment 3.3 – Demand forecast model - revised – Confidential</p> <p>Tab 1.1. AA4 by customer</p> <p>Tab 2.1 AA5 by customer</p>	<p>Commercial in confidence – details of individual customers</p>	<p>Demand forecast information for individual customers</p>	<p>Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities)</p> <p>Other (information which the NSP claims is confidential but does not fit into one of the above categories)</p>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Detriment to GGT's customers – competitors may be able to determine operational requirements for GGT customers activities.</p>	<p>Disclosure of the identified information would cause GGT to be in breach of its commercial agreements.</p> <p>Publication of individual customer information likely to be detrimental to customers. This information is not in the long-term interest of consumers.</p> <p>The significant detriment is not outweighed by the public benefit.</p>



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<p>Cost allocation model</p> <p>Filename: GGP AA5 Attachment 3.4 - Cost allocation model – revised – Confidential</p> <p>Entire workbook</p>	<p>Commercial in confidence – details of individual customers</p>	<p>Demand forecast information for individual customers</p>	<p>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)</p>	<p>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.</p> <p>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</p>	<p>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.</p> <p>Detriment to GGT’s customers – competitors may be able to determine operational requirements for GGT customers activities.</p>	<p>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.</p>



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<p>Capex coverage allocation model</p> <p>Filename: GGP AA5 Attachment 4.1 – Capex coverage allocation model – revised – Confidential</p> <p>Entire workbook</p>	<p>Includes information relating to specific customers</p> <p>Information concerning the physical security of GGT’s assets.</p>	<p>Capex</p>	<p>Market intelligence</p> <p>Other (information which the NSP claims is confidential but does not fit into one of the above categories)</p>	<p>Information on costs relating to specific customers.</p> <p>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</p>	<p>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.</p> <p>The information identified as confidential can affect the security of GGT assets and result in disruptions to supply to the customer.</p> <p>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.</p>	<p>No public benefit has been identified which could outweighs the detriment.</p> <p>The identified detriment risks significant financial and operational impacts and consequences for GGT impacts.</p> <p>Disruptions would have broader impact and ramifications across the economy and society</p> <p>The significant detriment is not outweighed by the public benefit.</p> <p>Publication of information is not in the long-term interest of consumers.</p>

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<p>ITOT project delivery supplementary information</p> <p>Filename: GGP AA5 Attachment 4.2 – ITOT project delivery – supplementary information - Confidential</p> <p>Entire document</p>	<p>IT project delivery information</p>	<p>Capex Opex</p>	<p>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).</p>	<p>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</p>	<p>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.</p>	<p>No known public benefit of disclosing this information outweighs the identified detriments.</p> <p>The only interested / beneficial parties are those seeking to disrupt and cause a cyber event.</p>
<p>Opex model</p> <p>Filename: GGP AA5 Attachment 5.1 – Opex model – revised – Confidential</p> <p>Tab 1.1 Detailed opex Tab 1.2 AA5 proposal CY23 Tab 2.1 NGI adjustment Tab 3.1 Corporate costs Tab 3.2 Transformation Tab 3.3 SoCI adjustment</p>	<p>Detailed GGT and APA historic operating expenditure</p>	<p>Opex</p>	<p>Market intelligence (information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities)</p>	<p>Market intelligence - Disclosing this information may influence future tender and commercial negotiations with future contractors and suppliers.</p>	<p>Disclosure of the information may undermine GGT's competitive procurement processes leading to higher costs.</p>	<p>No known public benefit of disclosing this information outweighs the identified detriments</p>