

# 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 8.2 Opex Business Cases	Throughout	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 8.4 Insurance Premium Forecast Report	All	n/a	Opex	Insurance premium information	Market sensitive cost inputs	Contains confidential unit cost information	A recipient of the Insurance Premium Forecast Report 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	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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								the prices they have charged us become public information.	
3	Attachment 8.5: Internal Review of Field Staff Remuneration	All	n/a	Opex	Field staff remuneration	Market sensitive cost inputs	Contains confidential remuneration information	A recipient would have access to confidential remuneration information which is not appropriate to publish.	A recipient would have access to confidential remuneration information for which there is no public benefit to publish.
4	Attachment 9.1 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 advantage or to the detriment of asset security. Contents appropriate for public release have been included in the Final Plan, specifically in Chapters 8 and 9.	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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5	Attachment 9.2 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 8 and 9.	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.
6	Attachment 9.3 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	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

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								public release have been included in the Final Plan, specifically in Chapters 8 and 9.	the proposal and there is no public benefit or long term consumer interest in disclosing asset specific details.
7	Attachment 9.4 IT Investment Plan	31	n/a	Capex	Commercial information	Market sensitive cost inputs	Contains confidential information about a supplier.	A recipient of the business cases would be able to identify confidential information about a supplier of IT business services.	There is no public benefit in releasing confidential business information about an individual supplier.
8	Attachment 9.5 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

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								charged us become public information.	no public benefit or long term consumer interest in disclosure.
9	Attachment 9.6 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.
10	Attachment 9.7 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

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								suppliers, who may suffer detriment if the prices they have charged us become public information.	overall RAB which forms the key input into our regulatory price. There is no public benefit or long term consumer interest in disclosure.
11	Attachment 9.8 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.
12	Attachment 6.2 Carbon TP Future of Gas Background Study	all	n/a	Future of Gas	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	Report covers overall depreciation. The information regarding

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								same commodity, competitors may be able to back-solve demand for each shipper, potentially causing detriment to shippers.	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.
13	Attachment 6.3 Future of Gas Model	all	n/a	Future of Gas	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 interest in disclosure and potential detriment to



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									third party shippers.
14	Attachment 7.1 Rebateable non reference service revenue detail	All	n/a	Pipeline and Reference Services	Demand for gas	Market sensitive cost inputs	The data presented represents demand for the relevant services from individual shippers	A recipient of the data would be able to identify individual demand for each shipper, including by competitors, potentially causing detriment to third party shippers	Lacking information on how much of a particular service one shipper has consumed makes no difference to any other shipper in respect of their own nominations for capacity, as nominations are dependent upon pipeline availability.
15	Attachment 13.1 - Service data and reconciliation with GSOO	All	n/a	Demand	Demand for Gas	Market sensitive cost inputs	The data presented represents demand for the relevant services from individual shippers	A recipient would now not only the consumption of particular services by rivals in the past but also,, since the reconciliation against the GSOO contains confidential information about shipper plans, confidential investment plans of other shippers	The primary purpose of the attachment is to provide information that would allow the ERA to match our forecast with one in the public domain. This is information needed only by the ERA.

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16	Attachment 13.2 - extracts from shipper contracts	All	n/a	Demand	Demand for Gas	Market sensitive cost inputs	Attachment is contract information for each shipper	These contracts are highly confidential to our shippers.	There is no public interest in the exact terms of each and every contract. The only party which needs this information is the ERA, when assessing our demand forecasts.
17	Attachment 14.1 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 party shippers and DBP.