

## Attachment 1.4

# Confidentiality Claims

July 2025

**PUBLIC**



**Australian  
Gas Networks**

Attachment 1.4 Table 1

AA Proposal	Attachment number	Document Name	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.)	Confidentiality category	Reason why the confidential information falls into the selected category.  If information falls within 'other' please provide further details on why the information should be treated as confidential.	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
Final Plan		Final Plan - Five year plan for our South Australia network					Not applicable		
Chapter 1 Attachments									
Final Plan attachment	1.1	Relevant Regulatory Framework					Not applicable		
Final Plan attachment	1.2	Five year plan for our South Australian Network					Not applicable		
Final Plan attachment	1.3	Final Plan document map					Not applicable		
Final Plan attachment	1.4	Confidentiality claims					Not applicable		
Final Plan attachment	1.5	Post Tax Revenue Model	PTRM input tab cells F619:AI624 and F547:F548, Forecast revenues tab F24:BC29, F102:BC107, F179:BC184, Confidential version Prudent Discount Tab	Customer information	Customer information including name and consumption	Personal information, market sensitive information	This model contains information identifiable to a specific customer	Our customers operate in a competitive market and providing this information publicly may provide an advantage to their competitors.	AGN's customers would be detrimentally impacted if information they provided to AGN on a confidential basis was released to the public. It could also damage AGN's competitive position, which would be detrimental to the wider customer base.
Final Plan attachment	1.6	Roll Forward Model					Not applicable		
Final Plan attachment	1.7	Depreciation Model					Not applicable		
Chapter 2 Attachments									
Final Plan attachment	2.1	AGIG Environmental, Social and Governance Report 2021					Not applicable		
Chapter 5 Attachments									
Final Plan attachment	5.1	AGN Final Customer and Stakeholder Engagement Plan for Consultation					Not applicable		
Final Plan attachment	5.2	Customer and Stakeholder Feedback Summary Tables					Not applicable		
Final Plan attachment	5.3	KPMG Final Report - AGN Customer Engagement Program					Not applicable		
Final Plan attachment	5.4	Draft Plan Submissions					Not applicable		
Chapter 6 Attachments									
Final Plan attachment	6.1	Future of Gas - our approach to accelerated depreciation					Not applicable		
Final Plan attachment	6.2	KPMG Expert Panel - Future of Gas Report					Not applicable		
Final Plan attachment	6.3	ACIL Allen - Future of Gas model description					Not applicable		
Final Plan attachment	6.4	Incenta Expert Report - Assessment of compliance with the requirements for regulatory depreciation					Not applicable		
Final Plan attachment	6.5 (1)	AGIG Future of Gas - Bulding Block Model					Not applicable		
Final Plan attachment	6.5 (2)	AGIG Future of Gas - ACIL Allen Consumer Choice Model					Not applicable		

Chapter 7 Attachments									
Chapter 8 Attachments									
Final Plan attachment	8.1	Opex Forecast Model	Input UAFG tab and Assumptions tab	Forecast volumes of Unaccounted for Gas (UAFG) over the next AA (2026/27 to 2030/31) period (and price in the Assumptions tab).	Unaccounted for Gas forecasts	Market sensitive cost inputs	AGN has claimed confidentiality over forecast UAFG volumes and price over the next AA period because it would indicate the assumed price and could adversely impact commercial negotiations of future UAFG prices.	Public disclosure of this information could undermine AGN's commercial negotiations regarding future UAFG prices paid, which will ultimately increase costs passed on to customers.	The actual opex incurred over the next AA period could increase if this information is publicly disclosed.
Final Plan attachment	8.2	Independent insurance assessment report	Entire document	Insurance company confidential information	opex, insurance premiums	Market intelligence	The document contains detail on forecast insurance costs and insurance premiums. Publishing the material will prejudice future tender and commercial negotiation processes between insurers and their customers.	Public disclosure of this information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore harm AGN's legitimate business interests.	Disclosure could therefore harm the insurer's legitimate business interests.
Final Plan attachment	8.3	BIS Oxford Economics Advice on Input Cost Escalation Forecasts					Not applicable		
Final Plan attachment	8.4	Unaccounted for Gas Internal Strategy and Performance Report	Entire document	Forecast volumes of UAFG over the next AA period.	Unaccounted for Gas forecasts	Market sensitive cost inputs	AGN has claimed confidentiality over forecast UAFG volumes over the next AA period so that commercial negotiations of future UAFG prices are not adversely impacted.	Public disclosure of this information could undermine AGN's commercial negotiations regarding future UAFG prices paid, which will ultimately increase costs passed on to customers.	The actual opex incurred over the next AA period could increase if this information is publicly disclosed. There is unlikely to be any material benefit from disclosing specific cost information to stakeholders.
Chapter 9 Attachments									
Final Plan attachment	9.1	Safety, Reliability, Maintenance and Technical Management Plan (Safety Plan)	Entire document	Information related to network security	Capital Expenditure and Operating Expenditure	Information affecting the security of the network	The document contains detailed information about asset risks, operational procedures, and emergency response measures that could pose a security risk if made public.	Disclosure could undermine the safe and reliable operation of our gas network.	Disclosure of information related to network security may compromise security of the network and public safety.
Final Plan attachment	9.2	Asset Management Strategy	13						
Final Plan attachment	9.3	Asset Management Plan	pp. 29, 31-33, 35-39, 41-42, 44-47, 51-55, 65; SOCI Act PROTECTED: pp 63, 64	Unit rates; contain Protected (SOCI) Information	Capital Expenditure and Operating Expenditure; Expenditure on control system architecture related to SOCI	Market sensitive cost inputs; contain Protected (SOCI) Information	The document contains detail on costs of goods and services. Publishing the material may prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential suppliers.  Security of critical infrastructure" of the Notice requires AGN SA to identify any information provided in response to this notice as protected (SOCI) information (as defined in the Security of Critical Infrastructure Act 2018).	Public disclosure of this information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore harm AGN's legitimate business interests.  The SOCI Act imposes obligations on operators of critical infrastructure to identify, protect, and restrict disclosure of such information.	The actual capex and opex could increase materially if forecast information is publicly disclosed. This could increase future prices substantially if forecast costs are based on actual incurred information. There is unlikely to be any material benefit from making this information public.



Final Plan attachment	9.4	Distribution Mains & Service Integrity Plan	pp. 2-3, 21, 23-24, 28-29, 40-44, 46-47, 50, 52, 54-57, 60	Unit rates, vendor name	Capital Expenditure	Market sensitive cost inputs	The document contains detail on costs of goods and services. Publishing the material may prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential suppliers.	Public disclosure of this information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore harm AGN's legitimate business interests.	The actual capex could increase materially if forecast information is publicly disclosed. This could increase future prices substantially if forecast costs are based on actual incurred information. There is unlikely to be any material benefit from making this information public.
Final Plan attachment	9.5	Meter Replacement Plan	pp. 1-5, 17, 22-23, 25, 27, 32-38, 40-42	Unit rates	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs, personal information	The document contains detail on costs of goods and services. Publishing the material may prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential suppliers.	Public disclosure of this information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore harm AGN's legitimate business interests.	The actual capex and opex could increase materially if forecast information is publicly disclosed. This could increase future prices substantially if forecast costs are based on actual incurred information. There is unlikely to be any material benefit from making this information public.
Final Plan attachment	9.6	Procurement Policy & Procedure	Not applicable						
Final Plan attachment	9.7	IT Investment Plan	SOCI Act PROTECTED: pp 21, 22	contain Protected (SOCI) Information	Expenditure on control system architecture related to SOCI	contain Protected (SOCI) Information	Security of critical infrastructure" of the Notice requires AGN SA to identify any information provided in response to this notice as protected (SOCI) information (as defined in the Security of Critical Infrastructure Act 2018).	The SOCI Act imposes obligations on operators of critical infrastructure to identify, protect, and restrict disclosure of such information.	The SOCI Act imposes obligations on operators of critical infrastructure to identify, protect, and restrict disclosure of such information.
Final Plan attachment	9.8	Capex Forecast Model	Various cells in the Tab: Calc  Project Costs, Input  Growth Capex Volumes	Unit rates and volumes	Capital Expenditure	Market sensitive cost inputs	The document contains detail on costs of goods and services. Publishing the material may prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential suppliers.	Public disclosure of this information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore harm AGN's legitimate business interests.	Disclosure could harm AGN's legitimate business interests and, ultimately, increase costs passed on to customers. There is unlikely to be any material benefit from disclosing specific cost information to stakeholders.
Final Plan attachment	9.9	Capex Business Cases (Non-IT)	pp. 40, 55, 56, 61, 62, 65, 71, 103, 113, 115, 120, 138, 142, 154, 155, 172, 173, 186, 192, 195, 198, 199, 201, 206, 207,213	Detail relating to costs of undertaking specific works, where those costs relate to goods and services provided by external providers, and network security	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs	The document contains detail on costs of goods and services. Publishing the material may prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential suppliers.	Public disclosure of this information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore harm AGN's legitimate business interests.	The actual capex and opex could increase materially if forecast information is publicly disclosed. This could increase future prices substantially if forecast costs are based on actual incurred information. There is unlikely to be any material benefit from making this information public.



Chapter 13 Attachments									
Final Plan attachment	13.1	Core Energy - Gas Demand Forecast					Not applicable		
Final Plan attachment	13.2	Demand Forecast Model	Entire document	Demand and Customer forecasts	Core Energy demand and customer forecasts	Market intelligence	Model contains proprietary information that if disclosed would provide an advantage to Core Energy's competitors. Contains easily identifiable personal information relating to individual customer demand.	Core Energy operates in a competitive market, and disclosing their proprietary information would provide an advantage to Core Energy's competitors. Competitors to our individual customers that operate in competitive markets may also be advantaged.	AGN's customers would be detrimentally impacted if the intellectual property contained in successful tender bids (such as Core Energy's proposal to develop Demand Forecasts) was released. This would diminish the incentive of potential tenderers to develop
Final Plan attachment	13.3	Weather Normalisation Model	Entire document	Demand and Customer forecasts		Market intelligence	Model contains proprietary information that if disclosed would provide an advantage to Core Energy's competitors. Contains easily identifiable personal information relating to individual customer demand.	Core Energy operates in a competitive market, and disclosing their proprietary information would provide an advantage to Core Energy's competitors. Competitors to our individual customers that operate in competitive markets may also be advantaged.	AGN's customers would be detrimentally impacted if the intellectual property contained in successful tender bids (such as Core Energy's proposal to develop Demand Forecasts) was released. This would diminish the incentive of potential tenderers to develop
Final Plan attachment	13.4	McGregor Tan Demand Survey	Entire document	Demand and Customer forecasts	Core Energy demand and customer forecasts	Market intelligence	Contains information relating to customer preferences and the results of a survey of around 400 customers.	Contains information relating to customer preferences and the results of a survey of around 400 customers.	Contains information relating to customer preferences and the results of a survey of around 400 customers.
Chapter 14 Attachments									
Final Plan attachment	14.1	Network Pricing, Formulae & Efficiency					Not applicable		
Final Plan attachment	14.2	Cost Allocation Model					Not applicable		
Final Plan attachment	14.3	Prudent Discount Summary	Entire document	Customer information	Customer information including name and consumption	Market intelligence	This model contains information identifiable to a specific customer	Our customers operate in a competitive market and providing this information publicly may provide an advantage to their competitors. It may also be detrimental to AGN as it increases the knowledge of AGN's competitors.	AGN's customers would be detrimentally impacted if information they provided to AGN on a confidential basis was released to the public. It could also damage AGN's competitive position, which would be detrimental to the wider customer base.
Chapter 15 Attachments									
Final Plan attachment	15.1	Consultation on the Terms and Conditions					Not applicable		
Final Plan attachment	15.2	Summary of Changes to the AA document					Not applicable		
AA and Terms and conditions									
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution networks 1 July 2026 to 30 June 2031 Clean					Not applicable		
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution networks 1 July 2026 to 30 June 2031 Clean					Not applicable		
Access Arrangement Document revision		Access Arrangement Annexure G General Terms and Conditions					Not applicable		

Attachment 1.4 Table 2

AA Proposal	Attachment number	Name	Number of pages of submission that include information subject to a claim of confidentiality	Number of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
Final Plan		Final Plan - Five year plan for our South Australia network	0	154	154	0%	100%
Chapter 1 Attachments							
Final Plan attachment	1.1	Relevant Regulatory Framework	0	22	22	0%	100%
Final Plan attachment	1.2	1.2 Five year plan for our South Australian network (SA Draft Plan July 2026 - June 2031)	0	120	120	0%	100%
Final Plan attachment	1.3	Final Plan document map	0	2	2	0%	100%
Final Plan attachment	1.4	Confidentiality claims	0	3	3	0%	100%
Final Plan attachment	1.5	Post Tax Revenue Model	0	13	13	0%	100%
Final Plan attachment	1.6	Roll Forward Model	0	8	8	0%	100%
Final Plan attachment	1.7	Depreciation Model	0	20	20	0%	100%
Chapter 2 Attachments							
Final Plan attachment	2.1	AGIG Environmental, Social and Governance Report 2021	0	33	33	0%	100%
Chapter 5 Attachments							
Final Plan attachment	5.1	AGN Final Customer and Stakeholder Engagement Plan for Consultation	0	24	24	0%	100%
Final Plan attachment	5.2	Customer and Stakeholder Feedback Summary Tables	0	10	10	0%	100%
Final Plan attachment	5.3	KPMG Final Report - AGN Customer Engagement Program	0	62	62	0%	100%
Final Plan attachment	5.4	Draft Plan Submissions	0	60	60	0%	100%
Chapter 6 Attachments							
Final Plan attachment	6.1	Future of Gas and Depreciation - Context and modelling detail	0	43	43	0%	100%
Final Plan attachment	6.2	AGN SA Future of Gas Model	0	20	20	0%	100%
Final Plan attachment	6.3	Expert report on inputs	0	12	12	0%	100%
Final Plan attachment	6.4	Energy Transition	0	32	32	0%	100%
Chapter 7 Attachments							
Chapter 8 Attachments							
Final Plan attachment	8.1	Opex Forecast Model	2	13	15.0	13%	87%
Final Plan attachment	8.2	Independent insurance assessment report	29	0	29	100%	0%
Final Plan attachment	8.3	BIS Oxford Economics Advice on Input Cost Escalation Forecasts	0	45	45	0%	100%
Final Plan attachment	8.4	Unaccounted for Gas Internal Strategy and Performance Report	23	0	23.0	100%	0%
Chapter 9 Attachments							
Final Plan attachment	9.1	Safety, Reliability, Maintenance and Technical Management Plan (Safety Plan)	76	0	76	100%	0%
Final Plan attachment	9.2	Asset Management Strategy	0	58	58	0%	100%
Final Plan attachment	9.3	Asset Management Plan	22	45	67	33%	67%
Final Plan attachment	9.4	Distribution Mains & Service Integrity Plan	17	44	61	28%	72%
Final Plan attachment	9.5	Meter Replacement Plan	13	30	43	30%	70%
Final Plan attachment	9.6	Procurement Policy & Procedure	0	3	3.0	0%	100%
Final Plan attachment	9.7	IT Investment Plan	2	48	50	4%	96%
Final Plan attachment	9.8	Capex Forecast Model	1	10	11	9%	91%
Final Plan attachment	9.9	Capex Business Cases (Non-IT)	26	237	263	10%	90%
Final Plan attachment	9.9	Capex Business Cases (IT)	30	147	177	17%	83%
Final Plan attachment	9.10	Unit Rate Report	41	7	48	85%	15%
Final Plan attachment	9.11	Risk Management Framework	0	12	12	0%	100%
Final Plan attachment	9.12	Network Augmentation Plan	13	31	44	30%	70%

Chapter 10 Attachments						
Chapter 11 Attachments						
Final Plan attachment	11.1	Averaging Period	3	0	3	100% 0%
Chapter 12 Attachments						
Final Plan attachment	12.1	ECM Model	0	2	2	0% 100%
Final Plan attachment	12.2	CESS Model	0	9	9	0% 100%
Chapter 13 Attachments						
Final Plan attachment	13.1	Core Energy - Gas Demand Forecast	0	51	51	0% 100%
Final Plan attachment	13.2	Demand Forecast Model	14	0	14	100% 0%
Final Plan attachment	13.3	Weather Normalisation Model	10	0	10	100% 0%
Final Plan attachment	13.4	McGregor Tan Demand Survey	51	0	51	100% 0%
Chapter 14 Attachments						
Final Plan attachment	14.1	Network Pricing, Formulae & Efficiency	0	6	6	0% 100%
Final Plan attachment	14.2	Cost Allocation Model	10	0	10	100% 0%
Final Plan attachment	14.3	Prudent Discount Summary	4	0	4	100% 0%
Chapter 15 Attachments						
Final Plan attachment	15.1	Consultation on the Terms and Conditions	0	7	7	0% 100%
Final Plan attachment	15.2	Summary of Changes to the AA document	0	6	6	0% 100%
AA and Terms and conditions						
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution networks 1 July 2026 to 30 June 2031. Clean	0	70	70	0% 100%
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution networks 1 July 2026 to 30 June 2031. Clean	0	70	70	0% 100%
Access Arrangement Document revision		Access Arrangement Annexure G General Terms and Conditions	0	52	52	0% 100%
TOTAL			387.0	1641.0	2028.0	19.1 80.9