



**Australian  
Gas Networks**

**Attachment 1.4**

# **Confidentiality Claims**

**Final Plan 2023/24 – 2027/28**

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July 2022

# 1 Introduction

We have developed our Australian Gas Networks (AGN) Victoria and Albury natural gas distribution network (the Network) Access Arrangement (AA) Proposal for the period 1 July 2023 to 30 June 2028 having regard to the Australian Energy Regulator’s (AER’s) Confidentiality Guideline (the Guideline).

Consistent with this Guideline, we have relied on as little confidential information in our AA Proposal as possible, however, at times it was necessary to call upon commercial and customer sensitive information to ensure the robustness of our AA Proposal. In these circumstances, we have marked confidential information:

- in CONFIDENTIAL documents by marking confidential information using yellow highlights;
- in PUBLIC documents by redacting confidential information using black highlights; and
- in PUBLIC spreadsheets by marking confidential information with the formatting “[c-i-c]”.

At times it was also necessary to make entire documents confidential.

Table 1 of this Attachment summarises all confidentiality claims we have made in relation to this AA Proposal. For comprehensiveness, all documents and models provided to the AER with our AA Proposal on 1 July 2022 have been included in the remaining sections of this Attachment.

Table 2 provides detail on the percentage of pages (or worksheets of spreadsheets) which contain confidential information.

AGN confirms that we consent to all non-confidential information being disclosed on the AER’s website.

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 Victoria and Albury networks					Not applicable		
<b>Chapter 1 Attachments</b>									
Final Plan attachment	1.1	Relevant Regulatory Framework					Not applicable		
Final Plan attachment	1.2	Five year plan for our Victoria and Albury Networks					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					Not applicable		
Final Plan attachment	1.6	Roll Forward Model					Not applicable		
Final Plan attachment	1.7	Depreciation Model					Not applicable		
<b>Chapter 2 Attachments</b>									
Final Plan attachment	2.1	AGIG Environmental, Social and Governance Report 2021					Not applicable		
<b>Chapter 5 Attachments</b>									
Final Plan attachment	5.1	Terms and Conditions Submissions	pp. 2-3, 8, 10-14, 16-17, 19-20	Signatures, email addresses and telephone numbers	Stakeholder engagement	Personal information	The material contains personal information about an individual or customer whose identity is apparent, or can reasonably be ascertained from the information which raises privacy considerations	Public disclosure of this information raise privacy considerations.	N/A
Final Plan attachment	5.2	Customer and Stakeholder Feedback Summary Tables					Not applicable		
Final Plan attachment	5.3	KPMG Final Report - AGN_MGN Customer Engagement Program					Not applicable		
Final Plan attachment	5.4	Draft Plan Submissions					Not applicable		
<b>Chapter 6 Attachments</b>									
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 - Building Block Model					Not applicable		
Final Plan attachment	6.5 (2)	AGIG Future of Gas - ACIL Allen Consumer Choice Model					Not applicable		
<b>Chapter 7 Attachments</b>									
<b>Chapter 8 Attachments</b>									
Final Plan attachment	8.1	Opex Forecast Model					Not applicable		
Final Plan attachment	8.2	Opex Business Cases	Throughout	Unit rates	Operating Expenditure	Market sensitive cost inputs	The material 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	8.3	BDO - Reclassification of certain programs to Opex from 2023/24							Not applicable	
Final Plan attachment	8.4	BIS Oxford Economics - Input price escalation Forecasts							Not applicable	
Final Plan attachment	8.5	BIS Oxford Economics Victoria Labour Costs Forecasts							Not applicable	
Final Plan attachment	8.6	ACIL Allen - Opex partial productivity study							Not applicable	
<b>Chapter 9 Attachments</b>										
Final Plan attachment	9.1	Asset Management Strategy							Not applicable	
Final Plan attachment	9.2	Asset Management Plan	pp. 27-32, 36-38, 44, 45, 52-54, 59, 61, 65, 67	Unit rates	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.
Final Plan attachment	9.3	Capex Forecast Model	'Capex Category Summary' I14:BJ22, I25:BJ31, I35:BJ37, I39:BJ44, I48:BJ53, I55:BJ62, I67:BJ69	Unit rates	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.	Disclosure could harm MGN'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	9.4	Procurement Policy & Procedure							Not applicable	
Final Plan attachment	9.5	Risk Management Framework							Not applicable	
Final Plan attachment	9.6	Unit Rate Report	pp. 4, 5, 10, 11, 13, 15-47	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs, personal information, information affecting the security of the network		The document contains detail on costs of goods and services and service providers. 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	9.7	Distribution Mains & Service Integrity Plan	pp. 39, 40, 42, 44, 46, 51, 52, 55, 56, 58, 61, 62, 64, 65	Unit rates	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.
Final Plan attachment	9.8	Meter Replacement Plan	pp. 5, 7, 33-40	Unit rates, personal information	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	9.9	IT Investment Plan							Not applicable	
Final Plan attachment	9.10(1)	AGIG Network Adaptation Strategy - Renewable Gas	Page 3	Personal Information	Capital Expenditure	Personal information	Personal signatures of employees		Public disclosure of signatures could lead to the signatures being used in an unauthorised manner.	There is no public benefit from the disclosure of personal signatures.

Final Plan attachment	9.10(2)	AGIG Network Adaptation Plan - Renewable Gas	pp. 3, 22-25	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs, personal information, information affecting the security of the network	The material 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	9.11(2)	Augmentation Business Cases	pp. 16, 46-48, 63-65, 71, 74 98-101	Unit rates	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.
Final Plan attachment	9.11(1)	HP Augmentation Projects	Not applicable						
Final Plan attachment	9.12	Telentery Business Cases	pp. 21, 26, 30-31	Unit rates	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.
Final Plan attachment	9.13	Other Capex Business Cases	pp. 21-22, 41-46, 108, 112-113, 119, 121, 128, 131-132, 134-139, 155, 159-161, 165-167, 170, 176-177, 196-198	Unit rates	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.
Final Plan attachment	9.14	IT Business Cases	pp 92, 103, 105, 128	Vendor name, market sensitive information	Capital Expenditure	Personal information, market sensitive information	The material contains specific vendor names and market sensitive information.	Public disclosure of this information may harm APA/AGN's legitimate business interests and commercial relationships.	There is no public benefit from the disclosure of specific vendor or market sensitive information.
<b>Chapter 11 Attachments</b>									
Final Plan attachment	11.1	Averaging Period	Entire document	Averaging period	Averaging period	Market sensitive cost inputs	The averaging period is a key input cost driver	Disclosure of the averaging period will lead to increased financing costs.	AGN's customers would be detrimentally impacted if AGN's averaging period was publically disclosed information as the resultant increased costs would be passed on to customers.
<b>Chapter 12 Attachments</b>									
Final Plan attachment	12.1	API Performance Targets	Not applicable						
<b>Chapter 13 Attachments</b>									
Final Plan attachment	13.1	Core Energy - Gas Demand Forecast	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 Victoria and Albury networks	0	148	148	0%	100%
<b>Chapter 1 Attachments</b>							
Final Plan attachment	1.1	Relevant Regulatory Framework	0	20	20	0%	100%
Final Plan attachment	1.2	Five year plan for our Victoria and Albury Networks	0	137	137	0%	100%
Final Plan attachment	1.3	Final Plan document map	0	2	2	0%	100%
Final Plan attachment	1.4	Confidentiality claims	0	8	8	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%
<b>Chapter 2 Attachments</b>							
Final Plan attachment	2.1	AGIG Environmental, Social and Governance Report 2021	0	22	22	0%	100%
<b>Chapter 5 Attachments</b>							
Final Plan attachment	5.1	Terms and Conditions Submissions	0	20	20	0%	100%
Final Plan attachment	5.2	Customer and Stakeholder Feedback Summary Tables	0	8	8	0%	100%
Final Plan attachment	5.3	KPMG Final Report - AGN Customer Engagement Program	0	71	71	0%	100%
Final Plan attachment	5.4	Draft Plan Submissions	0	32	32	0%	100%
<b>Chapter 6 Attachments</b>							
Final Plan attachment	6.1	Future of Gas - our approach to accelerated depreciation	0	82	82	0%	100%
Final Plan attachment	6.2	KPMG Expert Panel - Future of Gas Report	0	19	19	0%	100%
Final Plan attachment	6.3	ACIL Allen - Future of Gas model description	0	51	51	0%	100%
Final Plan attachment	6.4	Incenta Expert Report - Assessment of compliance with the requirements for regulatory depreciation	0	46	46	0%	100%
Final Plan attachment	6.5 (1)	AGIG Future of Gas - Buliding Block Model	0	10	10	0%	100%
Final Plan attachment	6.5 (2)	AGIG Future of Gas - ACIL Allen Consumer Choice Model	0	22	22	0%	100%
<b>Chapter 7 Attachments</b>							
<b>Chapter 8 Attachments</b>							
Final Plan attachment	8.1	Opex Forecast Model	0.0	11.0	11.0	0%	100%
Final Plan attachment	8.2	Opex Business Cases	18	67	85	21%	79%
Final Plan attachment	8.3	BDO - Reclassification of certain programs to Opex from 2023/24	0	18	18	0%	100%
Final Plan attachment	8.4	BIS Oxford Economics - Input price escalation Forecasts	0.0	38.0	38.0	0%	100%
Final Plan attachment	8.5	BIS Oxford Economics Victoria Labour Costs Forecasts	0.0	4.0	4.0	0%	100%
Final Plan attachment	8.6	ACIL Allen - Opex partial productivity study	0.0	48.0	48.0	0%	100%
<b>Chapter 9 Attachments</b>							
Final Plan attachment	9.1	Asset Management Strategy	0	60	60	0%	100%
Final Plan attachment	9.2	Asset Management Plan	17	68	85	20%	80%
Final Plan attachment	9.3	Capex Forecast Model	1	16	17	6%	94%
Final Plan attachment	9.4	Procurement Policy & Procedure	0.0	13.0	13.0	0%	100%
Final Plan attachment	9.5	Risk Management Framework	0	13	13	0%	100%
Final Plan attachment	9.6	Unit Rate Report	37	10	47	79%	21%
Final Plan attachment	9.7	Distribution Mains & Service Integrity Plan	12	56	68	18%	82%

Final Plan attachment	9.8	Meter Replacement Plan	11	38	49	22%	78%
Final Plan attachment	9.9	IT Investment Plan	0	49	49	0%	100%
Final Plan attachment	9.10 (1)	AGIG Network Adaptation Strategy - Renewable Gas	1.0	29.0	30.0	3%	97%
Final Plan attachment	9.10 (2)	AGIG Network Adaptation Plan - Renewable Gas	4	22	26	15%	85%
Final Plan attachment	9.11 (1)	Augmentation HP Projects	0	186	186	0%	100%
Final Plan attachment	9.11 (2)	Augmentation Business Cases	11	91	102	11%	89%
Final Plan attachment	9.12	Telemetry Business Cases	4	40	44	9%	91%
Final Plan attachment	9.13	Other Capex Business Cases	35	263	298	12%	88%
Final Plan attachment	9.14	IT Business Cases	2	132	134	1%	99%
<b>Chapter 10 Attachments</b>							
<b>Chapter 11 Attachments</b>							
Final Plan attachment	11.1	Averaging Period	3	0	3	100%	0%
<b>Chapter 12 Attachments</b>							
Final Plan attachment	12.1	API Performance Targets	0	1	1	0%	100%
<b>Chapter 13 Attachments</b>							
Final Plan attachment	13.1	Core Energy - Gas Demand Forecast	0	0	0	0%	100%
Final Plan attachment	13.2	Demand Forecast Model	17	0	17	100%	0%
Final Plan attachment	13.3	Weather Normalisation Model	6	0	6	100%	0%
<b>Chapter 14 Attachments</b>							
Final Plan attachment	14.1	Network Pricing, Formulae & Efficiency	0	22	22	0%	100%
Final Plan attachment	14.2	Cost Allocation Model	0	8	8	0%	100%
<b>Chapter 15 Attachments</b>							
Final Plan attachment	15.1	Consultation on the Terms and Conditions	0	21	21	0%	100%
Final Plan attachment	15.2	Summary of Changes to the AA document	0	6	6	0%	100%
<b>AA and Terms and conditions</b>							
Access Arrangement Document revision		Access Arrangement for our Victorian and Albury natural gas distribution networks 1 July 2023 to 30 June 2028 Clean	0	70	70	0%	100%
Access Arrangement Document revision		Access Arrangement for our Victorian and Albury natural gas distribution networks 1 July 2023 to 30 June 2028 Marked Up	0	70	70	0%	100%
Access Arrangement Document revision		Access Arrangement Annexure F Terms and Conditions	0	52	52	0%	100%
<b>TOTAL</b>			<b>179.0</b>	<b>2261.0</b>	<b>2440.0</b>	<b>7.3</b>	<b>92.7</b>