



**Australian
Gas Networks**

Attachment 18.0

Confidentiality Claims

**Responses to the 2023/24 to 2027/28 Access Arrangement
Regulatory Information Notice**

July 2022

Attachment 18.0 Confidentiality Claims

1. Access Arrangement RIN Response Confidentiality Claims

Attachment number	Document Name	Title, page, paragraph or table reference of the 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
1	Written Response					Not applicable		
2	Basis Of Preparation					Not applicable		
3	Workbook 1 - Forecast Data - Consolidated - Confidential					Not applicable		
4	Workbook 1 - Forecast Data - Consolidated - Public					Not applicable		
4	E2. Mains Repex	E2.1.1 Tables B & D E2.1.2 Tables B & D	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.
4	E3. Main Augex	E3.1 Tables B & D	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.
4	E3. Main Augex	E3.1 Tables F	Capital Contribution paid by a third parties to AGN	Customer contributions	Market sensitive cost inputs	Capital contribution value relates to one customer in a small segment of the market.	As these services are provided to a single party, publicly disclosing this information could harm our and third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
4	E4. Meter Replacement	E4.1.1.Tables B & D E4.1.2 Tables B & D E4.1.4 Tables B & D	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.
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4	E5. Connections	E5.2.1 Tables A, B, C, D & E	Connections capex – Unit rates	Capex	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of materials or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.

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4	E5. Connections	E5.4.2	Capital Contribution paid by a third parties to AGN	Customer contributions	Market sensitive cost inputs	Where there are three or less customer contributions this data can be used to estimate individual contributions paid by a customer.	Publicly disclosing this information could harm our and third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.	
4	E13. Other Capex	E13.1 Tables B & D	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.	
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5	Workbook 2 - Historical Data - Consolidated - Confidential					Not applicable			
6	Workbook 2 - Historical Data - Consolidated - Public								
6	E2. Mains Repex	E2.1.1 Tables B & D E2.1.2 Tables B & D	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.	
6	E3. Main Augex	E3.1 Tables B & D	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.	
6	E4. Meter Replacement	E4.1.1.Tables A, B, C, D, E & F E4.1.2 Tables A, B, C, D, E & F	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.	

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7	Workbook 2 - Historical Data - Actual - Confidential							
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8	Workbook 2 - Historical Data - Actual - Public							
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9	Workbook 2 - Historcal Data - Estimated - Confidential		Not applicable					
10	Workbook 2 - Historcal Data - Estimated - Public		Not applicable					
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11	Workbook 3 - Efficiency Carrover Mechanism - Public					Not applicable			
12	Workbook 4 - Indicative Bill Impacts - Public					Not applicable			
13	Workbook 6 - Capital Expenditure Sharing Scheme model - Consolidated - Public					Not applicable			

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						Not applicable		
14	Workbook 6 - Capital Expenditure Sharing Scheme model - Actual - Public					Not applicable		
15	Workbook 6 - Capital Expenditure Sharing Scheme model - Estimated - Public					Not applicable		
16	Workbook 1 - Historical Performance Data_Victoria 20112017 - Consolidated - Confidential					Not applicable		
17	Document Index					Not applicable		
18	Confidentiality Claims					Not applicable		
19	Audit and Review Opinions - Confidential					Not applicable		
20	Audit and Review Opinions - Public							
20	Audit and Review Opinions	pages 5, 6, 7, 13, 14, 19, 22, 23, 24 (Table 5.2.1), 29 & 30	Capex Unit Rates	Capex	Market sensitive cost inputs	This information contains underlying contractor unit rates which, if published, could affect our (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of materials or services could set a floor in the market and therefore harm our commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, we are not aware of any public benefit that would arise from publicly disclosing this information.
20	Audit and Review Opinions	page 24 (Table 5.4.2), 31	Capital Contribution paid by a third parties to AGN	Customer contributions	Market sensitive cost inputs	Where there are three or less customer contributions this data can be used to estimate individual contributions paid by a customer.	Publicly disclosing this information could harm our and third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
20	Audit and Review Opinions	pages 158, 161, 163, 166 & 168	Address and Signatures	RIN	Other			There is no public benefit in publically disclosing a signature
21	Statutory Declaration - Confidential					Not applicable		
22	Statutory Declaration - Public							
22	Statutory Declaration	page 1	Signatures and address	RIN	Other			There is no public benefit in publically disclosing a signature
Appendix 1	Directors' certification of key assumption opex and capex forecasts - Confidential					Not applicable		
Appendix 1	Directors' certification of key assumption opex and capex forecasts - Public							
Appendix 1	Directors' certification of key assumption opex and capex forecasts	page 5	Signature	RIN	Other			There is no public benefit in publically disclosing a signature
Appendix 2	Capital Expenditure Access Arrangement Period Variances - Public					Not applicable		

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2. Proportion of Confidential Information

Submission Title	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
Regulatory Template	53	312	365	14.5%	85.5%
Other Attachments	19	559	578	3.3%	96.7%
TOTAL	72.0	871.0	943.0	7.6%	92.4%