

## Attachment 1.9

# Confidentiality Claims

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SA Final Plan July 2021 – June 2026

July 2020

## Introduction

Australian Gas Networks (AGN) has developed its Revised Access Arrangement (AA) Proposal (Revised AA Proposal) for its South Australian natural gas distribution network (the Network) having regard to the Australian Energy Regulator's (AER's) Confidentiality Guideline (the Guideline)

Consistent with this Guideline, AGN has relied on as little confidential information in its Revised AA Proposal as possible, however, at times it was necessary to call upon commercial and customer sensitive information to ensure the robustness of our Revised AA Proposal. In these circumstances, AGN has 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 or models confidential.

Table 1 of this Attachment summarises all confidentiality claims made by AGN in relation to this Revised AA Proposal. For comprehensiveness, only the documents and models provided to the AER with our Revised AA Proposal on 6 January 2016 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 1.9 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 Australian network					Not applicable		
<b>Chapter 1 Attachments</b>									
Final Plan attachment	1.1	Document Index					Not applicable		
Final Plan attachment	1.2	Roll Forward Model					Not applicable		
Final Plan attachment	1.3	Depreciation model					Not applicable		
Final Plan attachment	1.4	Post Tax Revenue Model	PTRM Input tab cells F538:F541, rows 610 - 613, rows 688 - 691 Forecast Revenues tab rows 24 - 27, rows 102 - 109, rows 179 - 186 Confidential version of PTRM: Prudent Discounts tab	Customer information including name and consumption	Customer information	Personal 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. 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.
Final Plan attachment	1.5	Rate of Return					Not applicable		
Final Plan attachment	1.6	Relevant Regulatory Framework					Not applicable		
Final Plan attachment	1.7	Five year plan for our South Australian network (SA Draft Plan July 2021_June 2026)					Not applicable		
Final Plan attachment	1.8	Final Plan document map					Not applicable		
Final Plan attachment	1.9	Confidentiality claims					Not applicable		
<b>Chapter 2 Attachments</b>									
Final Plan attachment	2.1	AGIG Annual Review 2019					Not applicable		
<b>Chapter 5 Attachments</b>									
Final Plan attachment	5.1	AGN Customer and Stakeholder Engagement Plan for Consultation (April 2019)					Not applicable		
Final Plan attachment	5.2	Engagement summary tables					Not applicable		
Final Plan attachment	5.3	KPMG Customer Engagement Report (May 2020)					Not applicable		
Final Plan attachment	5.4	KPMG Co_design Report (January 2020)					Not applicable		
Final Plan attachment	5.5	Draft Plan Submissions by EWOSA, SAFRRA and SACOSS (April 2020)					Not applicable		
Final Plan attachment	5.6	KPMG SARG/RRG Draft Plan workshops Report (May 2020)					Not applicable		
<b>Chapter 6 Attachments</b>									

Final Plan attachment	6.1	AGN SA Reference Service Proposal						Not applicable	
<b>Chapter 7 Attachments</b>									
Final Plan attachment		Opex Forecast Model							
	7.1		Input-UAFG tab, rows 7-8	Forecast volumes of Unaccounted for Gas (UAFG) over the next (2016/17 to 2020/21) 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.
Final Plan attachment		Opex Business Cases							
	7.2			lease costs, salary costs, rates for gas fitters	Operating Expenditure	Market sensitive cost inputs	The material contains 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 and, ultimately, increase costs passed on to customers.	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 disclosing specific cost information to stakeholders.
Final Plan attachment	7.3	ACIL Allen Opex partial productivity study						Not applicable	
Final Plan attachment	7.4	Economic Insights Productivity performance						Not applicable	
Final Plan attachment	7.5	Economic insights benchmarking opex and capex						Not applicable	
Final Plan attachment		AIA UAFG Report							
	7.6		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.
Final Plan attachment		Marsh Insurance Access Arrangement Report							
	7.7		Market sensitive information pages 8 and 10, Personal information page 13	Insurance premiums and client information	Operating Expenditure, insurance premiums	Market intelligence	The document contains detail on forecast insurance costs, insurance premiums and the insurer's client list. Publishing the material will prejudice future tender and commercial negotiation processes between insurers and their customers.	Public disclosure of this information will undermine the confidentiality of our insurers information including its negotiating strategies with various clients, and information which we are not allowed to disclose. Disclosure could therefore harm the insurer's legitimate business interests.	Disclosure could therefore harm the insurer's legitimate business interests.
Final Plan attachment	7.8	BIS Oxford Input Cost escalation						Not applicable	
Final Plan attachment	7.8.1	BIS Oxford Input Cost escalation data						Not applicable	
Final Plan attachment		CoRE Independent assessment of the market price of gas							
	7.9		Market sensitive cost information pages 5, 7, 8, 9 and 11	Unit rate	Operating Expenditure	Market sensitive cost inputs	AGN has claimed confidentiality over forecast gas prices 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.
<b>Chapter 8 Attachments</b>									

Final Plan attachment	8.1	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	Contains personal information and specific network information.	Information pertaining to specific network details may compromise security of network and public safety.	Disclosure of information related to network security may compromise security of the network and public safety.	
Final Plan attachment	8.2	Strategic Asset Management Plan	Market sensitive cost information pages 49, 61, 65-66, 68, 74-80, 82, 84-86, 93, 95-97, 100-105 Network safety pages 48, 49, 50, 59-60	Unit rate, network security	Capital Expenditure	Market sensitive cost inputs	The document contains detail on forecast costs of undertaking works. Publishing the material will prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential contractors/suppliers. The are also redactions related information related to the security of the network that may pose security/safety risks if released.	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.	As mentioned previously, 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	8.3	Distribution Mains and Services Integrity Plan		Throughput	Unit rate	Capital Expenditure	Market sensitive cost inputs	The document contains detail on forecast costs of undertaking works. Publishing the material will prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential contractors/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.	As mentioned previously, 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	8.4	Meter Replacement Plan		Throughput	Unit rate	Capex	Market sensitive cost inputs	The document contains detail on forecast costs of undertaking works. Publishing the material will prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential contractors/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.	As mentioned previously, 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	8.5	Procurement Policy and Procedures	pp. 1, 25, 27, 38, 39	Unit rate	Capex	Market sensitive cost inputs	Not applicable	Not applicable	Not applicable	
Final Plan attachment	8.6	IT Investment Plan								
Final Plan attachment	8.7	Capex Forecast Model	Parts of tabs: category summary; unit rate categories; + overheads	Unit rate	Capital Expenditure	Market sensitive cost inputs	The document contains detail on forecast costs of undertaking works. Publishing the material will prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential contractors/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.	As mentioned previously, 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	8.8	Capex Business Cases		Throughput	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 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. The are also redactions related information related to the security of the network that may pose security/safety risks if released.	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 and, ultimately, increase costs passed on to customers.	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 disclosing specific cost information to stakeholders.

Final Plan attachment		Unit Rate Report							The document contains detail on forecast costs of undertaking works. Publishing the material will prejudice future tender and commercial negotiation processes between AGN/APA Asset Management and current and potential contractors/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.	As mentioned previously, 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	<b>8.9</b>		Throughout	Unit rate	Capital Expenditure	Market sensitive cost inputs					
Final Plan attachment	<b>8.10</b>	Risk Management Framework							Not applicable		
<b>Chapter 9 Attachments</b>											
Final Plan attachment	<b>9.1</b>	Incenta replacement of low pressure mains/inlets and non performing PE							Not applicable		
Final Plan attachment	<b>9.2</b>	Incenta replacement of low pressure mains/inlets and non performing PE Model							Not applicable		
<b>Chapter 10 Attachments</b>											
Final Plan attachment		Averaging Period									
	<b>10.1</b>		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 publicly disclosed information as the resultant increased costs would be passed on to customers.
<b>Chapter 11 Attachments</b>											
Final Plan attachment	<b>11.1</b>	CESS Asset Performance Index targets							Not applicable		
<b>Chapter 12 Attachments</b>											
Final Plan attachment	<b>12.1</b>	Core Energy Demand Forecasting Report							Not applicable		
Final Plan attachment		Demand Forecast Model									
	<b>12.2</b>		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. Information was sought from these customers on a confidential basis.		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 intellectual property, which would be detrimental to the quality of experts available to the AA process. Additionally, the model includes private information relating to individual customers' demand and/or bills.
Final Plan attachment		Weather Normalisation Model									
	<b>12.3</b>		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. Information was sought from these customers on a confidential basis.		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 intellectual property, which would be detrimental to the quality of experts available to the AA process. Additionally, the model includes private information relating to individual customers' demand and/or bills.
<b>Chapter 13 Attachments</b>											
Final Plan attachment	<b>13.1</b>	Tariff Structure							Not applicable		
Final Plan attachment	<b>13.2</b>	Cost Allocation Model							Not applicable		

Final Plan attachment	13.3	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.
<b>Chapter 14 Attachments</b>									
Final Plan attachment	14.1	Engagement with the AGN Retailer Reference Group June 20_20200627_PUBLIC					Not applicable		
Final Plan attachment	14.2	Summary of changes to Access Arrangement Document including Document Marked Version PUBLIC					Not applicable		
Final Plan attachment	14.3	Access Arrangement Annexure G Terms and Conditions Marked Version					Not applicable		
<b>AA and Terms and conditions</b>									
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution network 1 July 2021 to 30 June 2026 Clean					Not applicable		
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution network 1 July 2021 to 30 June 2026 Marked up					Not applicable		
Access Arrangement Document revision		Access Arrangement Annexure G Terms and Conditions					Not applicable		

Attachment 1.9 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	0.0	152.0	152.0	0.0	100.0
<b>Chapter 1 Attachments</b>							
Final Plan attachment	1.1	Document Index	0.0	3.0	3.0	0.0	100.0
Final Plan attachment	1.2	Roll Forward Model	0.0	11.0	11.0	0.0	100.0
Final Plan attachment	1.3	Depreciation model	0.0	7.0	7.0	0.0	100.0
Final Plan attachment	1.4	Post Tax Revenue Model	1.0	16.0	17.0	5.9	94.1
Final Plan attachment	1.5	Rate of return	0.0	5.0	5.0	0.0	100.0
Final Plan attachment	1.6	Relevant Regulatory Framework	0.0	19.0	19.0	0.0	100.0
Final Plan attachment	1.7	Five year plan for our South Australian network (SA Draft Plan July 2021_June 2026)	0.0	125.0	125.0	0.0	100.0
Final Plan attachment	1.8	Final Plan document map	0.0	1.0	1.0	0.0	100.0
Final Plan attachment	1.9	Confidentiality claims	0.0	5.0	5.0	0.0	100.0
<b>Chapter 2 Attachments</b>							
Final Plan attachment	2.1	AGIG Annual Review 2019	0.0	39.0	39.0	0.0	100.0
<b>Chapter 5 Attachments</b>							
Final Plan attachment	5.1	AGN Customer and Stakeholder Engagement Plan for Consultation (April 2019)	0.0	30.0	30.0	0.0	100.0
Final Plan attachment	5.2	Engagement summary tables	0.0	14.0	14.0	0.0	100.0
Final Plan attachment	5.3	KPMG Customer Engagement Report (May 2020)	0.0	51.0	51.0	0.0	100.0
Final Plan attachment	5.4	KPMG Co design Report (January 2020)	0.0	49.0	49.0	0.0	100.0
Final Plan attachment	5.5	Draft Plan Submissions by EWOSA, SAFRRA and SACOSS (April 2020)	0.0	8.0	8.0	0.0	100.0
Final Plan attachment	5.6	KPMG SARG/RRG Draft Plan workshops Report (May 2020)	0.0	7.0	7.0	0.0	100.0
<b>Chapter 6 Attachments</b>							
Final Plan attachment	6.1	AGN SA Reference Service Proposal	0.0	15.0	15.0	0.0	100.0
<b>Chapter 7 Attachments</b>							
Final Plan attachment	7.1	Opex Forecast Model	1.0	12.0	13.0	7.7	92.3
Final Plan attachment	7.2	Opex Business Cases	7.0	31.0	38.0	18.4	81.6
Final Plan attachment	7.3	ACIL Allen Opex partial productivity study	0.0	28.0	28.0	0.0	100.0
Final Plan attachment	7.4	Economic Insights Productivity performance	0.0	45.0	45.0	0.0	100.0
Final Plan attachment	7.5	Economic insights benchmarking opex and capex	0.0	37.0	37.0	0.0	100.0
Final Plan attachment	7.6	AIA UAFG Report	27.0	0.0	27.0	100.0	0.0
Final Plan attachment	7.7	Marsh Insurance Access Arrangement Report	3.0	16.0	19.0	15.8	84.2
Final Plan attachment	7.8	BIS Oxford Input Cost escalation	0.0	52.0	52.0	0.0	100.0
Final Plan attachment	7.8.1	BIS Oxford Input Cost escalation data	0.0	4.0	4.0	0.0	100.0
Final Plan attachment	7.9	CoRE Independent assessment of the market price of gas	5.0	8.0	13.0	38.5	61.5
<b>Chapter 8 Attachments</b>							
Final Plan attachment	8.1	Safety, Reliability, Maintenance and Technical Management Plan (Safety Plan)	71.0	0.0	71.0	100.0	0.0
Final Plan attachment	8.2	Strategic Asset Management Plan	30.0	86.0	116.0	25.9	74.1
Final Plan attachment	8.3	Distribution Mains and Services Integrity Plan	7.0	61.0	68.0	10.3	89.7
Final Plan attachment	8.4	Meter Replacement Plan	5.0	36.0	41.0	12.2	87.8
Final Plan attachment	8.5	Procurement Policy and Procedures	0.0	2.0	2.0	0.0	100.0
Final Plan attachment	8.6	IT Investment Plan	0.0	29.0	29.0	0.0	100.0
Final Plan attachment	8.7	Capex Forecast Model	3.0	15.0	18.0	16.7	83.3



Final Plan attachment	8.8	Capex Business Cases	148.0	330.0	478.0	31.0	69.0
Final Plan attachment	8.9	Unit Rate Report	49.0	15.0	64.0	76.0	23.4
Final Plan attachment	8.10	Risk Management Framework	0.0	11.0	11.0	0.0	100.0
<b>Chapter 9 Attachments</b>							
Final Plan attachment	9.1	Incenta Replacement of low pressure mains/inlets and non performing PF	0.0	17.0	17.0	0.0	100.0
Final Plan attachment	9.2	Incenta replacement of low pressure mains/inlets and non performing PE Model	0.0	8.0	8.0	0.0	100.0
<b>Chapter 10 Attachments</b>							
Final Plan attachment	10.1	Averaging Period	3.0	0.0	3.0	100.0	0.0
<b>Chapter 11 Attachments</b>							
Final Plan attachment	11.1	CESS Asset Performance Index targets	0.0	3.0	3.0	0.0	100.0
<b>Chapter 12 Attachments</b>							
Final Plan attachment	12.1	Core Energy Demand Forecasting Report	0.0	82.0	82.0	0.0	100.0
Final Plan attachment	12.2	Demand Forecast Model	17.0	0.0	17.0	100.0	0.0
Final Plan attachment	12.3	Weather Normalisation Model	9.0	0.0	9.0	100.0	0.0
<b>Chapter 13 Attachments</b>							
Final Plan attachment	13.1	Tariff Structure	0.0	23.0	23.0	0.0	100.0
Final Plan attachment	13.2	Cost Allocation Model	0.0	11.0	11.0	0.0	100.0
Final Plan attachment	13.3	Prudent Discount Summary	6.0	0.0	6.0	100.0	0.0
<b>Chapter 14 Attachments</b>							
Final Plan attachment	14.1	Consultation on the Terms and Conditions	0.0	33.0	33.0	0.0	100.0
Final Plan attachment	14.2	Summary of Changes to the AA document	0.0	7.0	7.0	0.0	100.0
<b>AA and Terms and conditions</b>							
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution network 1 July 2021 to 30 June 2026 Clean	0.0	65.0	65.0	0.0	100.0
Access Arrangement Document revision		Access Arrangement for our South Australian natural gas distribution network 1 July 2021 to 30 June 2026 Marked up	0.0	72.0	72.0		
Access Arrangement Document revision		Access Arrangement Annexure G Terms and Conditions	0.0	51.0	51.0	0.0	100.0
<b>TOTAL</b>			<b>392.0</b>	<b>1747.0</b>	<b>2139.0</b>	<b>18.3</b>	<b>81.7</b>