

Attachment 1.9A

Confidentiality claims

SA revised Final Plan July 2021 – June 2026
January 2021

1. Introduction

We have developed our revised Final Plan for our 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, we have relied on as little confidential information in our revised Final Plan as possible, however, at times it was necessary to refer to commercial or customer sensitive information to ensure the robustness of our revised Final Plan. 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 or models confidential.

Table 1 of this Attachment summarises all confidentiality claims made by us in relation to the revised Final Plan, attachments and the Access Arrangement Document. For comprehensiveness, only the documents and models provided to the AER with our revised Final Plan 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.

We confirm that we consent to all non-confidential information being disclosed on the AER's website.

**Attachment 1.9A
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
Revised Final Plan Overview		Overview					Not applicable		
Chapter 1 Attachments									
Revised Final Plan attachment	1.2A	Roll Forward Model					Not applicable		
Revised Final Plan attachment	1.3A	Depreciation model					Not applicable		
Revised Final Plan attachment	1.4A	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	Customer information including name and consumption	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. Further, 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.
Revised Final Plan attachment	1.5A	Rate of Return Model					Not applicable		
Revised Final Plan attachment	1.8A	Revised Final Plan document map					Not applicable		
Revised Final Plan attachment	1.9A	Revised Final Plan Confidentiality claims					Not applicable		
Chapter 2 Attachments									
Not applicable									
Chapter 5 Attachments									
Not applicable									
Chapter 6 Attachments									
Not applicable									
Chapter 7 Attachments									
Revised Final Plan attachment	7.1A	Revised Opex Forecast Model	Input-UAFG tab, rows 7-10 and reference in assumptions tab	Forecast price and 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 price and volumes and cost of renewable gas 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.	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.
Revised Final Plan attachment	7.2A	Addendum to Opex Business Cases					Not applicable		
Revised Final Plan attachment	7.8A	BIS Oxford Input Cost escalation forecasts to 2025/26					Not applicable		

Revised Final Plan attachment	7.8.1A	BIS Oxford Input Cost escalation forecasts - data						Not applicable		
Revised Final Plan attachment	7.10	Response to Draft Decision on Opex						Not applicable		
Chapter 8 Attachments										
Revised Final Plan attachment	8.3A	Response on Mains Replacement						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. Document also includes personal information (signatures, names and addresses).	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.
Revised Final Plan attachment	8.6A	Addendum to IT Investment Plan						Not applicable		
Revised Final Plan attachment	8.7A	Revised 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.	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.
Revised Final Plan attachment	8.8A	Addendum to Capex Business Cases	Detail relating to costs of undertaking specific works, where those costs relate to goods and services provided by external providers, and network security.	Unit rate	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.
Revised Final Plan attachment	8.11	Response to Draft Decision on Capex						Not applicable		
Revised Final Plan attachment	8.12	GHD review of selected distribution capex programs						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. Document also includes personal information (signatures).	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.
Chapter 9 Attachments										
Revised Final Plan attachment	9.3	Response to Draft Decision on Capital Base						Not applicable		
Revised Final Plan attachment	9.4	GHD Ongoing role of replaced HDPE pipelines	Section 2.3, Table 1	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. Document also includes personal information (signatures).	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.
Revised Final Plan attachment	9.5	BDO Review of proposed treatment for replaced HDPE Pipelines						Not applicable		
Revised Final Plan attachment	9.6	Future of Gas						Not applicable		

Chapter 10 Attachments						
Revised Final Plan attachment	10.2	Response to Draft Decision on Financing Costs				Not applicable
Chapter 11 Attachments						
Revised Final Plan attachment	11.2	Response to Draft Decision on Incentives				Not applicable
Revised Final Plan attachment	11.3	ECM Model				Not applicable
Chapter 12 Attachments						
Revised Final Plan attachment	12.1A	Core Energy Gas Demand and Customer Forecast Update				Not applicable
Revised Final Plan attachment		Revised Demand Forecast Model				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.
	12.2A		Entire document	demand and customer forecasts	Core Energy demand and customer forecasts	Market intelligence
Revised Final Plan attachment	12.4	Response to Draft Decision on Demand				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.
Revised Final Plan attachment	12.5	ACIL Allen Review of COVID-19 related adjustments				AGN's customers would be detrimentally impacted if the intellectual property contained in 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.
	12.5					Not applicable
	12.5					Not applicable
Chapter 13 Attachments						
Revised Final Plan attachment	13.4	Response to Draft Decision on Revenue and Prices				Not applicable
Chapter 14 Attachments						
Revised Final Plan attachment	14.2A	Response to Draft Decision Summary of changes to Access Arrangement Document including Document Marked Version_PUBLIC				Not applicable
Revised Final Plan attachment	14.3A	Access Arrangement Annexure G Terms and Conditions Marked Version (updated)				Not applicable
Revised Final Plan attachment	14.4	Response to Draft Decision on Network Access				Not applicable
AA and Terms and conditions						
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 1.9A
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
Revised Final Plan Overview		Overview	0.0	152.0	152.0	0.0	100.0
Chapter 1 Attachments							
Revised Final Plan attachment	1.2A	Roll Forward Model	0.0	12.0	12.0	0.0	100.0
Revised Final Plan attachment	1.3A	Depreciation model	0.0	8.0	8.0	0.0	100.0
Revised Final Plan attachment	1.4A	Post Tax Revenue Model	3.0	12.0	15.0	20.0	80.0
Revised Final Plan attachment	1.5A	Rate of return	0.0	6.0	6.0	0.0	100.0
Revised Final Plan attachment	1.8A	Final Plan document map	0.0	4.0	4.0	0.0	100.0
Revised Final Plan attachment	1.9A	Confidentiality claims	0.0	4.0	4.0	0.0	100.0
Chapter 2 Attachments							
Not applicable							
Chapter 5 Attachments							
Not applicable							
Chapter 6 Attachments							
Not applicable							
Chapter 7 Attachments							
Revised Final Plan attachment	7.1A	Response to Draft Decision: Opex Forecast Model	2.0	11.0	15.0	13.3	73.3
Revised Final Plan attachment	7.2A	Opex Business Cases	0.0	49.0	49.0	0.0	100.0
Revised Final Plan attachment	7.8A	BIS Oxford Input Cost escalation forecasts to 2025/26	0.0	58.0	58.0	0.0	100.0
Revised Final Plan attachment	7.8.1A	BIS Oxford Input Cost escalation forecasts - data	0.0	3.0	3.0	0.0	100.0
Revised Final Plan attachment	7.10	Response to Draft Decision on Opex	0.0	18.0	18.0	0.0	100.0
Chapter 8 Attachments							
Revised Final Plan attachment	8.3A	Response on Mains Replacement	10.0	34.0	44.0	22.7	77.3
Revised Final Plan attachment	8.6A	Addendum to IT Investment Plan	0.0	23.0	23.0	0.0	100.0
Revised Final Plan attachment	8.7A	Revised Capex Forecast Model	3.0	15.0	18.0	16.7	83.3
Revised Final Plan attachment	8.8A	Addendum to Capex Business Cases	2.0	13.0	15.0	13.3	86.7
Revised Final Plan attachment	8.11	Response to Draft Decision on Capital Expenditure	0.0	19.0	19.0	0.0	100.0
Revised Final Plan attachment	8.12	GHD review of selected distribution capex programs	3.0	32.0	35.0	8.6	91.4
Chapter 9 Attachments							
Revised Final Plan attachment	9.3	Response to Draft Decision on Capital Base	0.0	10.0	10.0	0.0	100.0
Revised Final Plan attachment	9.4	GHD Ongoing role of replaced HDPE pipelines	1.0	17.0	18.0	5.6	94.4
Revised Final Plan attachment	9.5	BDO Review of proposed treatment for replaced HDPE Pipelines	0.0	9.0	9.0	0.0	100.0
Revised Final Plan attachment	9.6	Future of Gas	0.0	17.0	17.0	0.0	100.0
Chapter 10 Attachments							
Revised Final Plan attachment	10.2	Response to Draft Decision on Financing Costs	0.0	6.0	6.0	0.0	100.0
Chapter 11 Attachments							

Revised Final Plan attachment	11.2	Response to Draft Decision on Incentives	0.0	7.0	7.0	0.0	100.0
Revised Final Plan attachment	11.3	Revised ECM Model	0.0	3.0	3.0	0.0	100.0
Chapter 12 Attachments							
Revised Final Plan attachment	12.1A	Core Energy Gas Demand and Customer Forecast Update	0.0	18.0	18.0	0.0	100.0
Revised Final Plan attachment	12.2A	Revised Demand Forecast Model	18.0	0.0	18.0	100.0	0.0
Revised Final Plan attachment	12.4	Response to Draft Decision on Demand	0.0	6.0	6.0	0.0	100.0
Revised Final Plan attachment	12.5	ACL Allen Review of COVID-19 related adjustments	0.0	7.0	7.0	0.0	100.0
Chapter 13 Attachments							
Revised Final Plan attachment	13.4	Response to Draft Decision on Revenue and Prices	0.0	9.0	9.0	0.0	100.0
Chapter 14 Attachments							
Revised Final Plan attachment	14.2A	Response to Draft Decision Summary of changes to Access Arrangement Document including Document Marked Version_PUBLIC	0.0	11.0	11.0	0.0	100.0
Revised Final Plan attachment	14.3A	Access Arrangement Annexure G Terms and Conditions Marked Version (updated)	0.0	53.0	53.0	0.0	100.0
Revised Final Plan attachment	14.4	Response to Draft Decision on Network Access	0.0	4.0	4.0	0.0	100.0
AA and Terms and conditions							
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	67.0	67.0	0.0	100.0
Access Arrangement Document revision		Access Arrangement Annexure G Terms and Conditions	0.0	51.0	51.0	0.0	100.0
TOTAL			42.0	833.0	877.0	4.8	95.0