

Attachment 16

Confidentiality Claims

Responses to the 2021 to 2026 Access Arrangement
Regulatory Information Notice

July 2020

1. Access Arrangement RIN Response Confidentiality Claims

Title, 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
RIN Attachment 1-Written Response						
Not applicable						
RIN Attachment 2- Basis of Preparation						
Not applicable						
RIN Attachment 3 Workbook 1 - Forecast data – Consolidated – Confidentiality						
RIN Tables E2.1.1B, E3.1B, E4.1.1B, E4.1.2B, E5.1.1B and E13.1B.	Direct contract expenditure	Capex – unit rates	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect AGN's (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 AGN's commercial interests and ultimately increase costs passed onto customers.	Disclosure could harm AGN's commercial interest and result in increased costs passed on to consumers. There is unlikely to be any material benefit from disclosing this information to stakeholders.
RIN Tables E4.2.1, E4.2.2 and E4.2.3.	Meter replacement volumes	Capex – unit rates	Market sensitive cost inputs	Revealing the volumes could disadvantage AGN in future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to AGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to AGN's outsourcing arrangements (including structure and activity) are commercially confidential to AGN and could harm AGN's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between AGN and its service providers.	Disclosure could harm AGN's commercial interest and prejudice future tender processes. There is unlikely to be any material benefit from disclosing this information to stakeholders.

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RIN Tables E5.2.1 and E5.3.1	Connections volumes and unit rates	Capex – Unit rates	Market sensitive cost inputs	This information contains underlying (contractor) labour costs which, if published, could affect AGN's (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 AGN's commercial interests and ultimately increase costs passed onto customers.	Disclosure could harm AGN's commercial interest and result in increased costs passed on to consumers. There is unlikely to be any material benefit from disclosing this information to stakeholders.
RIN Table N1.2, Only relates to rows associated with industrial, tariff D	Demand for industrial/tariff D	Demand	Market sensitive cost inputs	The tariff classes identified have few large customers which, if published, could potentially enable the demand from individual customers to be identified.	Public disclosure could potentially harm AGN and the third-party's commercial interests.	Disclosure could harm AGN's and third party's commercial interests. There is unlikely to be any material benefit from disclosing this information to stakeholders.
RIN Table F3.1.1	Revenue for industrial/tariff D	Revenue	Market sensitive cost inputs	The revenue for references services relates to small numbers of large customers. If published this could enable the revenue from an individual customer to be identified.	This is confidential information related to customers revenue. Publishing this information could harm legitimate business interests of customers receiving the reference service.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.
RIN Attachment 5 Workbook 2 - Historical data - Consolidated – Confidentiality RIN Attachment 7 Workbook 2 - Historical data - Actual – Confidentiality RIN Attachment 9 Workbook 2 - Historical data - Estimated – Confidentiality						
RIN Tables E2.1.1B, E3.1B, E4.1.1, E4.1.2 E5.1.1B and E13.1B.	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.	Disclosure could harm AGN's commercial interest and prejudice future procurement processes. There is unlikely to be any material benefit from disclosing this information to stakeholders.

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RIN Tables E5.1.1F and E13.1F.	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.	Disclosure could harm AGN and third party's interests. There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
RIN Tables E4.2.1, E4.2.2 and E4.2.3.	Meter replacement volumes	Capex	Market sensitive cost inputs	Revealing the volumes could disadvantage our future negotiations with future suppliers, leading to higher prices or less favourable purchasing conditions. Higher prices could ultimately be passed through to consumers. Revealing volumes supplied or proposed to be supplied to AGN could also prejudice the suppliers in their negotiation with other parties.	The details relating to our outsourcing arrangements (including structure and activity) are commercially confidential to AGN and could harm our and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between AGN and its service providers.	Disclosure could harm AGN's commercial interest and prejudice future tender processes. There is unlikely to be any material benefit from disclosing this information to stakeholders.
RIN Table E5.2.1	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.	Disclosure could harm AGN's commercial interest and prejudice future procurement processes. There is unlikely to be any material benefit from disclosing this information to stakeholders.
RIN Table E5.3.2	Connections volumes	Capex	Market sensitive cost inputs	This information can be used to back- calculate the unit rates.	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	Disclosure could harm AGN's commercial interest and prejudice future procurement processes. There is unlikely to be any material benefit from disclosing this information to stakeholders.

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					commercial interests and ultimately increase costs passed onto customers.	
RIN Table E.4.1 and 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.	Disclosure could harm AGN's and third party's commercial interests. There is unlikely to be any material benefit from disclosing this information to stakeholders.
RIN Attachment 11 Workbook 3 - Efficiency Carryover Mechanism – Consolidated						
RIN Attachment 12 Workbook 3 - Efficiency Carryover Mechanism – Actual						
RIN Attachment 13 Workbook 3 - Efficiency Carryover Mechanism – Estimated						
Not applicable						
RIN Attachment 14 Workbook 4 - Indicative bill impact						
Not applicable						
RIN Attachment 20 Statutory Declaration - Confidentiality						
1	Signature	RIN	Other			There is no public benefit in publicly disclosing a signature
RIN Attachment 17 Audit and Review Opinions - Confidentiality						
2	Signature	RIN	Other			There is no public benefit in in publicly disclosing a signature
RIN Supporting documents						
AGN - Appendix 1 - Regulatory Accounting	Signatures	RIN	Other			There is no public benefit in publicly disclosing a signature

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Principles and Policies-20200701-Confidential						
AGN - Appendix 2 - Capitalisation Policy-20200701-Confidential	Signatures	RIN	Other			There is no public benefit in publicly disclosing a signature
AGN - Appendix 3 - Cost Allocation Methodology-20200701-Confidential	Signatures	RIN	Other			There is no public benefit in publicly disclosing a signature
AGN - Appendix 4 – Directors' certification of key assumptions opex and capex forecasts-20200701-Confidential	Signature	RIN	Other			There is no public benefit in publicly disclosing a signature

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	12	30	42	29%	71%
Other Attachments	7	279	286	2%	98%