

**Statement of Compliance  
Confidentiality Requirements of National Gas Law**

TO: Australian Energy Regulator

FROM: Susan Taylor – General Counsel & Company Secretary

DATE: 30/10/2009

This statement confirms compliance by SPI Networks (Gas) Pty Ltd with Rule 137 of the National Gas Rules. Rule 137 provides:

- ...
- (1) A scheme pipeline service provider must not:
    - (a) disclose relevant confidential information; or
    - (b) use relevant confidential information for a purpose other than the purpose for which the information was given to the service provider.
  - (2) A scheme pipeline service provider must take all practicable steps to protect relevant confidential information in the service provider's possession against improper disclosure or use.
1. We recognise that SPI Networks (Gas) Pty Ltd has a duty to maintain the confidentiality of relevant confidential information, and we have put into place practices and procedures that reflect this.
  2. We understand that relevant confidential information received by SPI Networks (Gas) Pty Ltd, in its capacity as a Pipeline Service Provider, should only be used for the purpose for which the information was given.
  3. We have the following mechanisms and/or policies in place to ensure that confidential information provided to SPI Networks (Gas) Pty Ltd is protected against improper disclosure or use:
    - Employment contracts contain a confidentiality clause.
    - SP AusNet Information Security Policy.
    - SP AusNet Business Code of Conduct.
    - SP AusNet Information Services Acceptable User Policy.
    - Periodic training deployed to all staff.
    - Implementation of Access Controls.
    - Relevant confidentiality clauses in agreements relating to the provision of services on the Gas Distribution Network.
    - Requirement for third parties to sign a confidentiality agreement.

Note: Policies relating to Information Security comply with International Standard  
ISO/IEC 27001:2006.

Attached please find a copy of SP AusNet's Information Security Policy Statement and a  
sample of the Content of an on-line training Module.

As General Counsel & Company Secretary, I have read and understand the requirements of  
Rule 137 of the National Gas Rules and confirm to the best of my knowledge and belief that  
SPI Networks (Gas) Pty Ltd has complied with the provisions of this clause.



Susan Taylor

**GENERAL COUNSEL & COMPANY SECRETARY**