

Attachment 1.8

Confidentiality Claims

**2016/17 to 2020/21 Access
Arrangement Information**

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1 Introduction

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

Consistent with this Guideline, AGN has relied on as little confidential information in its AA Proposal as possible, however, at times it was necessary to call upon commercial and customer sensitive information to ensure our AA Proposal is robust. In these circumstances, AGN has marked confidential information:

- in documents by redacting confidential information using black highlights; and
- in spreadsheets by marking confidential information by formatting the cells as [c-i-c] and highlighting the cells in yellow.

At times it was also necessary to make entire documents or models confidential.

Section 2 of this Attachment summarises all confidentiality claims made by AGN in relation to this AA Proposal. As outlined in Section 3, overall, only 406 pages (or 9% of the total AA Proposal) contained confidential information.

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

2 Confidentiality Claims

TABLE 1: CONFIDENTIALITY CLAIMS FOR AGN'S AA PROPOSAL

Title, Page and Paragraph Number of Document Containing the Confidential Information	Description of the Confidential Information	Topic the Confidential Information Relates to	Identify the Recognised Confidentiality Category that the Confidential Information Falls Within	Provide a Brief Explanation of why the Confidential Information Falls into the Selected Category	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 (Especially Public Benefits Such as the Effect on the Long-Term Interests of Consumers)
AA Customer Overview						
No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AA Document						
No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AA Document – Annexure G						
No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI						
No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 1						
Attachment 1.1: Regulatory Information Notice (RIN) Template – forecast unit costs are confidential	Forecast unit costs for undertaking capital works. All other information is available to the public	Capital expenditure	Market sensitive cost inputs	The RIN contains detail on forecast unit rates 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, particularly if actual unit rates are used to forecast capex in subsequent periods.

Attachment 1.2: RIN Index – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 1.3: AGN Chief Executive Officer Statutory Declaration – personal details of Chief Executive Officer	Chief Executive Officer Address	Chief Executive Officer Address	Personal Information	Attachment contains the address of the AGN Chief Executive Officer	Release of this information is a safety concern	This information does not assist the public in terms of understanding AGN's proposal and its disclosure poses safety concerns to the AGN Chief Executive Officer.
Attachment 1.4: South Australian Roll Forward Model – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 1.5: South Australian Post Tax Revenue Model – prudent discount customer information	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.
Attachment 1.6: HoustonKemp, Australian Gas Networks AER Gas Price Review – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 1.7: AGN AAI Submission Document Map – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 1.8: AGN Confidentiality Claims – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 2						

Attachment 2.1: Mr Ian Little Affidavit – confidential	Entire affidavit	The affidavits are used to describe the nature of the relationship between AGN and APA Asset Management, refers to confidential clauses of the Operating and Management Agreement and how that contract is applied.	Market Intelligence	The affidavits reflect statements from the then executive management teams of Envestra and APA Asset Management on key business strategy, including around business acquisition strategy and network operations. Reference to key parts of the Operating and Management Agreement.	AGN operates in a competitive market. Disclosure of this information would provide insight and an advantage to AGN competitors in commercial negotiations.	A decline in the AGN competitive position (such as by the release of market intelligence) would negatively impact AGN's ability to operate and compete. This could result in an increase in the cost of doing business and make us less competitive in commercial situations. These increased costs would ultimately negatively impact our customers.
Attachment 2.2: Mr Peter Cain Affidavit – confidential						
Attachment 2.3: Mr John Ferguson Affidavit – confidential						
Attachment 2.4: K Lowe Consulting, Benchmark Study of Contractor Profit Margins (2005-2014) – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 3						
Attachment 3.1: Log of Documents on the AGN Stakeholder Engagement Website – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.2: AGN Stakeholder Engagement Scoping Paper – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.3: Log of Engagement Activities with External Stakeholders – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.4: External Meeting Summaries – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 3.5: AGN Stakeholder Engagement Strategy – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.6: AGN South Australian Stakeholder Engagement Strategy – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.7: AGN Stakeholder Workshop Presentation – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.8: AGN Fact Sheet – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.9: Deloitte – AGN Stakeholder Insights Report – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.10: Documents Pertaining to the Essential Services Commission of South Australia’s Review of AGN’s Jurisdictional Service Standards – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 3.11: AGN Insights and Implementation Report – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 4						

Attachment 4.1: Economic Insights, The Productivity Performance of AGN's South Australian Gas Distribution System – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 4.2: Economic Insights, Benchmarking AGN's South Australian Business Operating and Capital Costs Using Partial Performance Indicators – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 5						
Attachment 5.1: Incenta Economic Consulting, Using the Profile of Prices During an Access Arrangement Period and Return of Capital to Improve Financial Metrics – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 7						
Attachment 7.1, Business Case SA77 (pages 382-395)	Business Case description and cost breakdown	Operating Expenditure	Strategic Information and Other	This information describes an AGN project that would be disadvantaged should details of the project be made publicly available. It also includes commercially sensitive information relating to potential future customers.	Making this information publicly available would be to the detriment of AGN's commercial interests and potentially harmful to existing and potential customers of AGN.	Making this information available to the public will likely jeopardise the proposed project from proceeding. This will in-turn limit the availability of natural gas supply and increase prices to existing customers relative to the situation that would arise should the project proceed.

Attachment 7.1, Business Cases SA52, SA54 and SA56 (pages 197-208, 219-231 and 233-244)	Business Case description and cost breakdown	Operating & Capital Expenditure	Other	The information relating to the risks associated with some older plastic mains is a sensitive matter and needs to be managed appropriately to avoid elevating public concern unnecessarily.	AGN is confident that it is undertaking prudent and efficient actions to manage risks associated with the plastic mains in question, having undertaken ongoing monitoring, analysis, research and materials testing including consulting with the Office of the Technical Regulator and overseas experts in this area. This is a highly technical area. Placing this information in the public domain may lead to speculation and misinformed opinions on the level of risk, and AGN's risk management strategy already in place. Release of information is likely to give rise to public concern regarding the safety of the gas network. This is not in the public interest or in AGN's commercial interest given AGN's structured approach to managing the risk. Creating public concern could result in considerable additional resources being required to respond to the public response. The drivers and impact of the plastic mains replacement program have been articulated in AGN's Access Arrangement Information, which explains the reasons for this proposed expenditure to stakeholders.	If this information became public, there is a possibility of public pressure to mitigate risk in both the short and medium term to beyond what is currently considered as low as reasonably practicable. That is, to eliminate all of the older plastic mains within a period shorter than proposed by AGN. As AGN has proposed a structured approach to managing the risks, the costs and practicalities of accelerated replacement are not in the long term interests of consumers. There is also concern that the public would form erroneous views on the safety of their natural gas supply that could result in unwarranted consumer and public stress and concern over the safety and condition of the network. Consumers may request disconnection believing it to be an appropriate action to mitigate risk however this will have no impact on the already known risk profile or its ongoing management.
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Attachment 7.1: Business Cases for Operational Expenditure and Capital Expenditure – cost inputs (all other confidentiality claims within this Attachment not previously addressed in this table, various page references)	Detail relating to costs of undertaking specific works, where those costs relate to goods and services provided by external providers.	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.	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.
Attachment 7.2: Australian Gas Networks' Property and Public Liability Insurance – confidential	Detailed information relating to AGN's insurance premiums	Operating expenditure	Market intelligence	This document contains confidential and commercially sensitive information which has been provided to AGN and the AER on a confidential basis.	The insurance provider operates in a competitive market, and disclosing this information would provide an advantage to their competitors	AGN's customers would be detrimentally impacted if information 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.
Attachment 7.3: Unaccounted for Gas Forecasts – technical analysis of the composition of UAFG redacted	Technical analysis of the composition of UAFG.	Operating expenditure	Market intelligence	The document contains a report that has been provided to AGN on a confidential basis because it contains information that relates to a methodology that has been developed by the consultant (to quantify and analyse UAFG) and which is intellectual property.	The consultant operates in a competitive market, and disclosing their proprietary information would provide an advantage to their competitors.	AGN's customers would be detrimentally impacted if the intellectual property contained in successful tender bids (such as this one to develop Unaccounted for Gas 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.
Attachment 7.4: Breakdown of Incremental Cost per Customer – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 7.5: BIS Shrapnel, Real Cost Escalation Forecasts to 2021 – South Australia – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 7.6: Professor Borland, Recommendations for Methodology for Forecasting WPI – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 7.7: Operating Expenditure Forecast Model – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 8						
Attachment 8.1: Asset Management Plan – partially redacted	Detail related to cost and risk management.	Capital expenditure	Other / Market sensitive cost inputs	The material relates to costs and analysis that may prejudice the ability of AGN to manage the network in a cost effective and prudent manner.	Public disclosure of this information could harm AGN's legitimate business interests.	Harm to AGN's business interest would likely result in increased costs to our customers.
Attachment 8.2: Mains Replacement Plan – partially redacted	Detail relating to technical issues, material analysis, risk analysis, costs and unit rates.	Capital expenditure	Other / Market sensitive cost inputs	The material relates to costs and analysis that may prejudice the ability of AGN to manage the network in a cost effective and prudent manner.	Public disclosure of this information could harm AGN's legitimate business interests.	Harm to AGN's business interest would likely result in increased costs to our customers.
Attachment 8.3: Capacity Management Plan – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 8.4: Information Technology Plan – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 8.5: Network Materials and Services Contracting Regime – confidential	Processes and strategies used internally for procurement of goods and services.	Capital expenditure and operating expenditure	Market sensitive cost inputs	The material contains detail on processes and strategies used in tendering and procurement of goods and services. Publishing the material may prejudice future tender and commercial negotiation processes between AGN/APA 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.	As mentioned previously, disclosure could harm AGN's legitimate business interests and, ultimately, increase costs passed on to customers.
Attachment 8.6: Unit Rates – South Australia – cost details redacted	Forecast unit costs for undertaking capital works	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.
Attachment 8.7: Gas Measurement Management Plan – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 8.8: Capital Expenditure Forecast Model – unit rates and volumes redacted	Unit rate and volume forecasts	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.

AAI Attachments to Chapter 9						
Attachment 9.1: CEG, Measuring Expected Inflation for the PTRM – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 10						
Attachment 10.1: Rate of Return – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.2: Averaging Period – confidential	Sets out the averaging period for determining the return on debt and equity	Rate of return	Market sensitive cost inputs	AGN will likely enter into financial derivatives/instruments over the averaging period. Publishing the material will prejudice future commercial negotiation with financial institutions.	Given the size and tenor of the likely derivative transactions to be undertaken, the prior awareness of market participants may cause an adverse drift in market pricing.	There is no benefit to stakeholders in understanding our proposal from knowing the specific averaging period. The potential costs arising from an adverse drift in market pricing could be substantial.
Attachment 10.3: SFG Consulting, The Required Return on Equity for a Regulated Gas and Electricity Network Business – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.4: SFG Consulting, The Required Return on Equity for the Benchmark Efficient Entity – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 10.5: SFG Consulting, The Foundation Model Approach of the Australian Energy Regulator to Estimating the Cost of Equity – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.6: SFG Consulting, Using the Fama-French Model to Estimate the Required Return on Equity – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.7: SFG Consulting, Share Prices, the Dividend Discount Model and the Cost of Equity for the Market and a Benchmark Energy Network – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.7A: SFG, Equity Beta – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.8: SFG Consulting, Beta and the Black Capital Asset Pricing Model – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.9: NERA, Historical Estimates of the Market Risk Premium – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 10.10: NERA, Review of the Literature in Support of the SL CAPM, the Black CAPM and the Fama French Three Factor Model – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.11: Incenta Economic Consulting, Further Update on the Required Return on Equity from Independent Expert Reports – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.12: NERA, Empirical Performance of Sharpe-Lintner and Black CAPMs – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.13: Frontier Economics, Review of the AER's Conceptual Analysis for Equity Beta – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.14: Frontier Economics, An Updated Estimate of the Required Return on Equity, Report Prepared for Australian Gas Networks – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.15: Letter from Grant Samuel & Associates Pty Limited (Grant Samuel) to the Directors of Transgrid; 12 January 2015 – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 10.16: Frontier Economics, Key Issues in Estimating the Return on Equity for the Benchmark Efficient Entity – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.17: NERA, The Cost of Equity: Response to the AER's Final Decision for the NSW and ACT Electricity Distributors and for Jemena Gas Networks – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.18: NERA, Further Assessment of the Historical MRP: Response to the AER's Final Decision for the NSW and ACT Electricity Distributors – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.19: Witness statement of Dr Robert Malko – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.20: Witness statement of Ronald L Knect – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.21: Incenta Economic Consulting, Debt Raising Transaction Costs – Updated Report – Jemena – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 10.22: CEG, The Hybrid Method for the Transition to the Trailing Average Rate of Return on Debt, Assessment and Calculations for AGN – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.23: CEG, Efficient Use of Interest Rate Swaps to Manage Interest Rate Risk – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.24: CEG – The New Issue Premium – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 10.25: Secondary Supporting Material Index	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 11						
Attachment 11.1: PricewaterhouseCoopers, Post Tax Revenue Model Methodology – Review of Initial Taxation Asset Base – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.2: Value of Imputation Credits – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.3: SFG Consulting, An Appropriate Regulatory Estimate of Gamma – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Attachment 11.4: SFG Consulting, Estimating Gamma for Regulatory Purposes – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.5: Frontier Economics, An Appropriate Regulatory Estimate of Gamma – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.6: Centre for International Finance and Regulation Working Paper – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.7: NERA, Estimating Distribution and Redemption Rates from Taxation Statistics – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.8: SFG Consulting, Updated Dividend Drop-off Estimate of Theta – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 11.9: NERA, Estimating Distribution and Redemption Rates: Response to the AER's Final Decision for the NSW and ACT Electricity Distributors and for Jemena Gas Networks – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 13						

Attachment 13.1: Prudent Discount Summary – confidential	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.
AAI Attachments to Chapter 14						
Attachment 14.1: Core Energy Group, Demand Forecasting Report – pg. 63, 64 and 65.	Customer information	Customer information including name and consumption	Personal information	Core's report contains information identifiable to a specific customer.	In order to ensure forecasts were robust, AGN sought confidential information from customers on to information Core's models. The release of this information could be detrimental to the customer that provided the information.	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 the wider customer base as consumers may become reluctant to provide AGN with information (knowing that it will be made public) and therefore AGN would be unable to source reliable information on which to base forecasts.
Attachment 14.2: Core Energy Group, Demand Forecast Model – whole model is confidential	Core Energy proprietary methodology	Core Energy demand and customer forecasts	Market intelligence and personal information	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.

Attachment 14.3 Core Energy Group, Weather Normalisation Model – whole model is confidential	Core Energy proprietary methodology	Core Energy weather normalisation of historic demand	Market intelligence	Model contains proprietary information that if disclosed would provide an advantage to Core Energy's competitors.	Core Energy operates in a competitive market, and disclosing their proprietary information would provide an advantage to Core Energy's competitors.	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.
Attachment 14.4: BIS Shrapnel, South Australian Dwelling Start Forecast Methodology – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 15						
Attachment 15.1: Cost Allocation Model – whole model is confidential	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
AAI Attachments to Chapter 17						
Attachment 17.1: Marked-up Terms and Conditions – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Attachment 17.2: Engagement with the Australian Gas Networks Retailer Reference Group on Terms and Conditions – no confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

In addition to the material set out in our AA Proposal (as outlined in Table 1) AGN has provided secondary reference materials in support of our proposal. These materials and any associated confidentiality claims are outlined in Table 2.

TABLE 2: CONFIDENTIALITY CLAIMS FOR AGN'S SECONDARY REFERENCE MATERIALS

Title, Page and Paragraph Number of Document Containing the Confidential Information	Description of the Confidential Information	Topic the Confidential Information Relates to	Identify the Recognised Confidentiality Category that the Confidential Information Falls Within	Provide a Brief Explanation of why the Confidential Information Falls into the Selected Category	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 (Especially Public Benefits Such as the Effect on the Long-Term Interests of Consumers)
Attachment 1.2						
Appendix B – personal details of signatory	Signatory address	Signatory address	Personal Information	Attachment contains the address of one of the document signatories.	Release of this information is a safety concern.	This information does not assist the public in terms of understanding AGN's proposal and its disclosure poses safety concerns to the signatory.
Appendix D – confidential	Operating and Management Agreement (OMA)	Expenditure	Strategic information	The OMA sets out the specific terms of the relationship between AGN and APA Asset Management, and is required to be held confidential.	AGN would be in breach of the OMA. APA has only permitted AGN to release the contract to the AER.	The key terms of the contract are included in our AA Proposal.
Attachment 7.1						
Appendix A	Contractor proprietary methodology and forecast costs	Expenditure	Market intelligence and market sensitive cost inputs	Documents contain proprietary information that if disclosed would provide an advantage to the contractor's competitors.	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.
Appendix B						
Appendix C						
Appendix D						
Appendix E						

Attachment 8.2						
Appendix B - confidential	Plastic mains replacement	Expenditure	Other	Relates to specific safety management issues on the plastic pipes.	Could cause unnecessary public concern over safety management.	May cause disruption to the efficient operation and use of natural gas supply.
Attachment 8.6						
Appendix 1a - confidential	Forecast unit costs for undertaking capital works	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.
Appendix 1b - confidential						
Appendix 2a – confidential						
Appendix 2b – confidential						
Appendix 3a – confidential						
Appendix 3b – confidential						
Appendix 3c – confidential						
Appendix 3d – confidential						
Appendix 3e – confidential						
Appendix 5a – confidential						
Appendix 6a – confidential						
Appendix 7 - confidential						
Chapter 10 (see Attachment 10.25 for further detail)						
10A – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10B – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10C – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10D – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10E – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

10F – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10G – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10H – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10I – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10J – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10K – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10L – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10M – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10N – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
10O – No confidential information	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

3 Proportion of Confidential Material

TABLE 3: PROPORTION OF CONFIDENTIAL INFORMATION IN AGN'S AA PROPOSAL

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
Customer Overview	0	16	16	0%	100%
AA Document	0	46	46	0%	100%
AA Document – Annexure G	0	51	51	0%	100%
AAI Document	0	303	303	0%	100%
Attachment 1.1	38 sheets	0	38 sheets	100%	0%
Attachment 1.2	0	36	36	0%	100%
Attachment 1.3	1	2	3	33%	67%
Attachment 1.4	0	8 sheets	8 sheets	0%	100%
Attachment 1.5	1 sheet	18 sheets	19 sheets	5%	95%
Attachment 1.6	0	87	87	0%	100%
Attachment 1.7	0	5	5	0%	100%
Attachment 1.8	0	31	31	0%	100%
Attachment 2.1	38	0	38	100%	0%
Attachment 2.2	11	0	11	100%	0%
Attachment 2.3	20	0	20	100%	0%
Attachment 2.4	0	48	48	0%	100%
Attachment 3.1	0	3	3	0%	100%
Attachment 3.2	0	16	16	0%	100%

ATTACHMENT 1.8: CONFIDENTIALITY CLAIMS

Attachment 3.3	0	10	10	0%	100%
Attachment 3.4	0	36	36	0%	100%
Attachment 3.5	0	10	10	0%	100%
Attachment 3.6	0	26	26	0%	100%
Attachment 3.7	0	42	42	0%	100%
Attachment 3.8	0	6	6	0%	100%
Attachment 3.9	0	38	38	0%	100%
Attachment 3.10	0	108	108	0%	100%
Attachment 3.11	0	31	31	0%	100%
Attachment 4.1	0	42	42	0%	100%
Attachment 4.2	0	34	34	0%	100%
Attachment 5.1	0	48	48	0%	100%
Attachment 7.1	88	343	431	20%	80%
Attachment 7.2	19	0	19	100%	0%
Attachment 7.3	13	14	27	48%	52%
Attachment 7.4	0	2 sheets	2 sheets	0%	100%
Attachment 7.5	0	57	57	0%	100%
Attachment 7.6	0	16	16	0%	100%
Attachment 7.7	0	13 sheets	13 sheets	0%	100%
Attachment 8.1	10	98	108	9%	91%
Attachment 8.2	29	27	56	52%	48%
Attachment 8.3	0	35	35	0%	100%
Attachment 8.4	0	48	48	0%	100%
Attachment 8.5	23	0	23	100%	0%
Attachment 8.6	37	8	45	82%	18%
Attachment 8.7	0	37	37	0%	100%

ATTACHMENT 1.8: CONFIDENTIALITY CLAIMS

Attachment 8.8	24 sheets	16 sheets	40 sheets	60%	40%
Attachment 9.1	0	41	41	0%	100%
Attachment 10.1	0	61	61	0%	100%
Attachment 10.2	6	0	6	100%	0%
Attachment 10.3	0	11	11	0%	100%
Attachment 10.4	0	65	65	0%	100%
Attachment 10.5	0	55	55	0%	100%
Attachment 10.6	0	60	60	0%	100%
Attachment 10.7	0	68	68	0%	100%
Attachment 10.7A	0	70	70	0%	100%
Attachment 10.8	0	70	70	0%	100%
Attachment 10.9	0	76	76	0%	100%
Attachment 10.10	0	77	77	0%	100%
Attachment 10.11	0	74	74	0%	100%
Attachment 10.12	0	88	88	0%	100%
Attachment 10.13	0	54	54	0%	100%
Attachment 10.14	0	15	15	0%	100%
Attachment 10.15	0	13	13	0%	100%
Attachment 10.16	0	93	93	0%	100%
Attachment 10.17	0	85	85	0%	100%
Attachment 10.18	0	71	71	0%	100%
Attachment 10.19	0	35	35	0%	100%
Attachment 10.20	0	11	11	0%	100%
Attachment 10.21	0	27	27	0%	100%
Attachment 10.22	0	129	129	0%	100%
Attachment 10.23	0	123	123	0%	100%

ATTACHMENT 1.8: CONFIDENTIALITY CLAIMS

Attachment 10.24	0	92	92	0%	100%
Attachment 10.25	0	4	4	0%	100%
Attachment 11.1	0	33	33	0%	100%
Attachment 11.2	0	17	17	0%	100%
Attachment 11.3	0	122	122	0%	100%
Attachment 11.4	0	73	73	0%	100%
Attachment 11.5	0	66	66	0%	100%
Attachment 11.6	0	44	44	0%	100%
Attachment 11.7	0	73	73	0%	100%
Attachment 11.8	0	36	36	0%	100%
Attachment 11.9	0	63	63	0%	100%
Attachment 13.1	6 sheets	0	6 sheets	100%	0%
Attachment 14.1	3	112	115	3%	97%
Attachment 14.2	16 sheets	0	16 sheets	100%	0%
Attachment 14.3	12 sheets	0	12 sheets	100%	0%
Attachment 14.4	0	6	6	0%	100%
Attachment 15.1	11 sheets	0	11 sheet	100%	0%
Attachment 17.1	0	61	61	0%	100%
Attachment 17.2	0	17	17	0%	100%
Total	406	4,106	4,512	9%	91%

As outlined in Section 2 of this Attachment, in addition to the AA Proposal AGN is submitting several secondary information sources. Table 4 summarises the proportion of confidential information contained within this supporting information.

TABLE 4: PROPORTION OF CONFIDENTIAL INFORMATION IN AGN'S SECONDARY MATERIALS

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
Attachment 1.2 – Appendix B	1	44	45	2%	98%
Attachment 1.2 – Appendix D	65	0	65	100%	0%
Attachment 7.1 – Appendix A	25	0	25	100%	0%
Attachment 7.1 – Appendix B	11	0	11	100%	0%
Attachment 7.1 – Appendix C	100	0	100	100%	0%
Attachment 7.1 – Appendix D	81	0	81	100%	0%
Attachment 7.1 – Appendix E	88	0	88	100%	0%
Attachment 8.2 – Appendix B	71	0	71	100%	0%
Attachment 8.6 – Appendix 1a	136	0	136	100%	0%
Attachment 8.6 – Appendix 1b	136	0	136	100%	0%
Attachment 8.6 – Appendix 2a	98	0	98	100%	0%
Attachment 8.6 – Appendix 2b	98	0	98	100%	0%

ATTACHMENT 1.8: CONFIDENTIALITY CLAIMS

Attachment 8.6 – Appendix 3a	4 sheets	0	4 sheets	100%	0%
Attachment 8.6 – Appendix 3b	3 sheets	0	3 sheets	100%	0%
Attachment 8.6 – Appendix 3c	3 sheets	0	3 sheets	100%	0%
Attachment 8.6 – Appendix 3d	3 sheets	0	3 sheets	100%	0%
Attachment 8.6 – Appendix 3e	3 sheets	0	3 sheets	100%	0%
Attachment 8.6 – Appendix 5a	12	0	12	100%	0%
Attachment 8.6 – Appendix 6a	1 sheet	0	1 sheet	100%	0%
Attachment 8.6 – Appendix 7	11 sheets	0	11 sheets	100%	0%
10A	0	103	103	0%	100%
10B	0	31	31	0%	100%
10C	0	214	214	0%	100%
10D	0	53	53	0%	100%
10E	0	105	105	0%	100%
10F	0	39	39	0%	100%
10G	0	22	22	0%	100%
10H	0	23	23	0%	100%
10I	0	95	95	0%	100%
10J	0	104	104	0%	100%
10K	0	27	27	0%	100%
10L	0	26	26	0%	100%
10M	0	28	28	0%	100%

ATTACHMENT 1.8: CONFIDENTIALITY CLAIMS

10N	0	21	21	0%	100%
10O	0	108	108	0%	100%