

# Appendix D

## Confidentiality register

ACT and Queanbeyan-Palerang gas  
network 2021–26

Submission to the Australian Energy Regulator

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## D Confidentiality register

### D.1 Purpose of the appendix

If particular information – sensitive information – is confidential, and its public disclosure could cause undue harm to the legitimate business interests of the *service provider* (Evoenergy), a network user or prospective user, the AER may permit the *service provider* to submit *access arrangement information* in a form, approved by the AER, in which the sensitive information:

- is either aggregated or generalised so as to avoid disclosure of the elements that make it sensitive; or
- if that is not possible, is entirely suppressed.<sup>1</sup>

Appendix D forms a register of sensitive information in a form approved by the AER where appropriate treatment of the information is proposed to mitigate harm.

The AER's confidentiality guidelines<sup>2</sup> require the service provider to provide the following information in connection with each item where confidentiality is sought:

- title, page and paragraph number of document containing confidential Information;
- a description of the confidential information;
- the topic the confidential information relates to (e.g. capex, opex, the rate of return etc.);
- the category that the confidential information falls within;
- a brief explanation of why the confidential information falls into the selected recognised confidentiality category. If the confidential information falls within 'other', further details on why the information should be treated as confidential;
- reasons supporting how and why detriment would be caused from disclosing the confidential information; and
- 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).

Table D.1 sets out this information for Evoenergy's access arrangement information while Table D.3 sets out this information for the Reset Regulatory Information Notice (RIN).

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<sup>1</sup> Rules, cl. 43(2)

<sup>2</sup> AER, 2017, Better Regulation Confidentiality Guideline

**Table D.1 Access arrangement information confidentiality claims**

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Appendix 2.1 Opex model</b>						
'Input   Category specific' tab cells N40:S43 and all of 'UAG price' tab	Forecast wholesale contract price for unaccounted for gas (UAG)	Future UAG costs	Market sensitive cost inputs	Revealing forecast average UAG price and estimation technique would diminish Evoenergy's ability to obtain competitive UAG prices	Revealing this information could inhibit procuring this gas at competitive rates and increase operating costs which are passed on to customers	As UAG is a pass through cost, Evoenergy's customers would be worse off should Evoenergy's ability to obtain competitive UAG prices diminish.
<b>Appendix 2.6 Piggings project documentation</b>						
Project cost estimates contained in the following <b>opportunity briefs</b> : <ul style="list-style-type: none"> <li>Appendix 2.6a Canberra primary main integrity assessment</li> <li>Appendix 2.6e Canberra primary main validation digs</li> <li>Appendix 2.6g Hoskinstown to Fyshwick integrity assessment</li> <li>Appendix 2.6k Hoskinstown to Fyshwick validation digs</li> </ul>	Forecast piggings cost information	Project cost estimates	Market sensitive cost inputs and strategic information	Publication of this information would affect Evoenergy's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices.	Publication of this information may influence tenders in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<p>Project cost estimates contained in the following <b>options analyses</b> relating to the pigging step change:</p> <ul style="list-style-type: none"> <li>Appendix 2.6b Canberra primary main integrity assessment (pages 2, 8, 14, 15, 20, 22, 25)</li> <li>Appendix 2.6h Hoskinstown to Fyshwick integrity assessment (pages 2, 8, 14, 15, 20, 22, 25)</li> </ul>	Forecast pigging cost information	Project cost estimates	Market sensitive cost inputs and strategic information	Publication of this information would affect Evoenergy's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices.	Publication of this information may influence tenders in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.
<p><b>Project estimation models (PEMs)</b> for the following relating to the pigging step change:</p> <ul style="list-style-type: none"> <li>Appendix 2.6c Canberra primary main integrity assessment</li> <li>Appendix 2.6f Canberra primary main validation digs</li> <li>Appendix 2.6i Hoskinstown to Fyshwick integrity assessment</li> <li>Appendix 2.6l Hoskinstown to Fyshwick validation digs</li> </ul>	Forecast pigging cost information	Project cost estimates	Market sensitive cost inputs and strategic information	Publication of this information would affect Evoenergy's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices.	Publication of this information may influence tenders in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<p>The following <b>NPV</b> workbooks relating to the pigging step change:</p> <p>Appendix 2.6d Canberra primary main integrity assessment</p> <ul style="list-style-type: none"> <li>Worksheet NPV Calc   Options 1 (cells N49:P50, X49:Z50, I65:Z66, and I100:Z105)</li> <li>Worksheet   Option Comparison (cells I16:Z16 and I31)</li> </ul> <p>Appendix 2.6j Hoskinstown to Fyshwick integrity assessment</p> <ul style="list-style-type: none"> <li>Worksheet NPV Calc   Options 1 (cells J49:V50, I65:V67, and I101:V106)</li> <li>Worksheet   Option Comparison (cells I16:AA16 and I31)</li> </ul>	Forecast pigging cost information	Project cost estimates	Market sensitive cost inputs and strategic information	Publication of this information would affect Evoenergy's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices.	Publication of this information may influence tenders in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.
<b>Appendix 3.1 General capex model</b>						
Entire model	Capex model	Capex forecast inputs and methodology	Market sensitive cost inputs and strategic information	The model contains unit rates and other detailed capex financial and project level information. Publication of this information would affect Evoenergy's ability to obtain competitive prices in the future and would adversely affect our ability to negotiate fair market prices.	Publication of this information may influence tenders in the future.	Publication of this information would be harmful (and result in cost increases that would flow through to higher bills) and there is no public benefit that can be realised.

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Appendix 3.2 Market expansion model</b>						
Entire model	Market expansion (Connections) capex – unit rates	Capex	Market sensitive cost inputs	This information contains underlying (contractor) labour and material costs which, if published, could affect Evoenergy's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of material or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm Evoenergy's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>Appendix 3.3 Meter replacement model</b>						
Entire model	Meter replacement capex – volumes and unit rates	Capex	Market sensitive cost inputs	This information contains underlying (contractor) labour and material costs which, if published, could affect Evoenergy's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	Revealing unit rates for procuring particular types of material or services could set a floor in the market when procuring such services in the future. Disclosure could therefore harm Evoenergy's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>Appendix 3.5 Connection and metering forecasting methodology</b>						
Page 1 Figure 1-1 Page 3 Figure 1-2 Page 4 Figure 1-3 & Figure 1-4 Page 7 Table 2-1, Table 2-2, Table 2-3, Table 2-4 Page 8 Table 2-6, Table 2-7, Table 2-8, Table 2-9	Unit rates (and information that can be used to derive this material)	Market Expansion (connections) capex	Market sensitive cost inputs	This information contains underlying contractor unit rates could affect Evoenergy's third-party service providers' ability to obtain competitive prices in future procurement processes.	Public disclosure of contractor costs for particular types of material or services could set a floor in the market and therefore harm Evoenergy's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any public benefit that would arise from publicly disclosing this information

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Appendix 3.12 Meter replacement volume forecast model</b>						
Entire model	Meter replacement volumes by types	Capex	Market sensitive cost inputs	Revealing the volumes could disadvantage Evoenergy 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 Evoenergy could also prejudice the suppliers in their negotiation with other parties.	The details relating to outsourcing arrangements (including structure and activity) are commercially confidential and could harm Evoenergy's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between Evoenergy and its service providers, as well as commercial negotiations between Evoenergy's related parties and their unrelated customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material incremental benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>Appendix 4.2 Post tax revenue model</b>						
'PTRM Input' sheet cells G540, F542, F551, G616:K616, G618:K618, and G627:K627	Price and forecast sales information	Revenue	Market sensitive information and Personal information	The tariff classes identified have few customers which if published could potentially enable the price, demand and revenue from individual customers to be identified	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers on these tariff categories.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.



Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
'PTRM Forecast revenues' sheet cells G30:K30, R30:V30, G32:K32, G41:K41, R108:V108, G110:K110, G119:K119, R185:V185, G187:K187, and G196:K196	Price, forecast sales and revenue information	Revenue	Market sensitive information and Personal information	The tariff classes identified have few customers which if published could potentially enable the price, demand and revenue from individual customers to be identified	This is confidential information related to customers' bills. Publishing this information could harm legitimate business interests of customers on these tariff categories.	This is customer confidential information that may impact their business interests. There is no public benefit to identifying this customer information.
<b>Appendix 5.1 Proposed averaging periods</b>						
Whole document	Proposed averaging periods for the risk-free rate and the cost of debt for the 2021-26 Access Arrangement period	Rate of return	Market sensitive cost inputs	The AER requires this to be submitted on a confidential basis. Averaging periods reveal commercially sensitive information about refinancing, hedging, and portfolio growth modelling. The averaging period is not required by stakeholders in order to assess the substance of all issues arising in Evoenergy's Access Arrangement proposal.	Cause detriment to Evoenergy's ability to obtain competitively priced finance and impact legitimate commercial interests.	The long term interests of customers would be harmed if financing costs increased due to the disclosure of market sensitive information.

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Appendix 7.2 Demand forecasting model</b>						
Whole document	Excel based model containing detailed customer usage information, calculations and results for Evoenergy's proposed demand forecast for the 2021-26 Access Arrangement Period	Demand forecasts	Personal information  Other	<p>The appendix contains labelled consumption data for demand customers, allowing individual customers to be identified</p> <p>The appendix includes suburb-level population forecasts from the ACT Government, that are not publicly available.</p> <p>The model contains intellectual property relating to the forecast methodology and calculations.</p>	CIE operates in a competitive market, and disclosing proprietary information would provide an advantage to 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.	Evoenergy's customers would be detrimentally impacted if the intellectual property contained in successful tender bids 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 and/or confidential information relating to individual customers' demand and/or bills.

**Table D.2 Proportion of confidential material**

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
Appendix 2.1 Opex model	2	12	14	14%	86%
Appendix 2.6a Canberra primary main integrity assessment OB	2	0	2	100%	0%
Appendix 2.6b Canberra primary main integrity assessment	7	21	28	25%	75%
Appendix 2.6c Canberra primary main integrity assessment	1	0	1	100%	0%
Appendix 2.6d Canberra primary main integrity assessment	2	6	8	25%	75%
Appendix 2.6e Canberra primary main validation digs	2	0	2	100%	0%
Appendix 2.6f Canberra primary main validation digs	1	0	1	100%	0%
Appendix 2.6g Hoskinstown to Fyshwick integrity assessment	2	0	2	100%	0%
Appendix 2.6h Hoskinstown to Fyshwick integrity assessment	7	21	28	25%	75%
Appendix 2.6i Hoskinstown to Fyshwick integrity assessment	1	0	1	100%	0%
Appendix 2.6j Hoskinstown to Fyshwick integrity assessment	2	6	8	25%	75%
Appendix 2.6k Hoskinstown to Fyshwick validation digs	2	0	2	100%	0%
Appendix 2.6l Hoskinstown to Fyshwick validation digs	1	0	1	100%	0%
Appendix 3.1 Capex model	1	13	14	7%	93%
Appendix 3.2 Market expansion model	13	0	13	100%	0%
Appendix 3.3 Meter replacement model	11	0	11	100%	0%
Appendix 3.5 Connection and metering forecasting methodology	5	18	23	22%	78%
Appendix 3.12 Meter replacement volume forecast model	12	0	12	100%	0%
Appendix 4.2 Post tax revenue model	2	11	13	15%	85%
Appendix 5.1 Proposed averaging periods	5	0	5	100%	0%
Appendix 7.2 Demand forecasting model	36	0	36	100%	0%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in the Access Arrangement 2021-26 for Evoenergy that is subject to a claim of confidentiality compared to that which is not.

**Table D.3 Access arrangement reset RIN response confidentiality claims**

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Attachment 4 Workbook 1 - forecast</b>						
Workbook 1 E2.1.1B E3.1B E4.1.3B E5.1.1B E6.5.1B E13.1B	Direct Contractor Expenditure	Direct Contractor Expenditure	Market sensitive cost inputs	Supplier prices would affect the NSP's ability to obtain competitive prices in future infrastructure transactions, such as tender 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 Evoenergy's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material benefit from the AER publishing this information, as opposed to using it on a confidential basis.
Workbook 1 E5.2.1 E5.3.2	Connections Unit Rates and Volumes	Unit Rates	Market sensitive cost inputs	See above	See above	See above
Workbook 1 N1.2 Only relates to rows associated with tariffs Volume Business Small (VBS), Volume Business Medium (VBM) and Demand Throughput (DT)	Demand for tariffs with three or fewer customers	Demand	Market sensitive cost inputs	The tariff categories identified have three or less customers which, if published, could potentially enable the demand from individual customers to be identified.	Public disclosure could potentially harm Evoenergy and the third-party's commercial interests.	Evoenergy is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
Workbook 1 F3.1.1 Only relates to rows associated with tariffs Volume Business Small (VBS), Volume Business Medium (VBM) and Demand Throughput (DT)	Revenue for tariffs with three or fewer customers	Revenue	Market sensitive cost inputs	The tariff categories identified have three or less customers which, if published, could potentially enable the revenue from individual customers to be identified.	Public disclosure could potentially harm Evoenergy and the third-party's commercial interests.	See above.
<b>Attachments 6, 7 and 8 Workbook 2 - historical – Consolidated, Actual, and Estimated</b>						
Workbook 2 E2.1.1B E3.1B E4.1.3B E5.1.1B E6.5.1B E13.1B	Direct Contractor Expenditure	Direct Contractor Expenditure	Market sensitive cost inputs	This information contains underlying (contractor) costs which, if published, could affect Evoenergy'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 Evoenergy's commercial interests and ultimately increase costs passed onto customers.	See above.
Workbook 2 E5.2.1 E5.3.2	Connections Unit Rates and Volumes	Unit Rates	Market sensitive cost inputs	See above	See above	See above

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
Workbook 2 E5.4.2	Capital Contributions	Number of Capital Contributions	Personal information	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 Evoenergy and third-party's commercial interests.	There is no public benefit in publicly disclosing this information as it relates to individual customers not customers generally.
<b>Attachment 13 Outsourcing Arrangements</b>						
RIN Attachment 13 page 6, Table 2-1	Direct contract expenditure with related party under the DAMS Agreement	Direct Contractor Expenditure	Market sensitive cost inputs	This information contains underlying (contractor) costs which, if published, could affect Evoenergy's (and third-party service providers') ability to obtain competitive prices in future procurement processes.	The details relating to Evoenergy's outsourcing arrangements (including structure and activity) are commercially confidential to Evoenergy and could harm Evoenergy's and those parties' commercial interests if published. Public disclosure of this information may prejudice future tender processes between Evoenergy and its service providers, as well as commercial negotiations between Evoenergy's related parties and their unrelated customers.	Evoenergy is not aware of any public benefit in publicly disclosing this information that could outweigh the detriment.

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
RIN Attachment 13 Page 10, section 2.4.3.3 End of Second Paragraph	The margin paid to Evoenergy's related parties	Margin	Market Sensitive cost inputs	<p>The information relates to Evoenergy's outsourcing arrangements (including structure and activity scope). Revealing the margin could set a floor in the market when Evoenergy seeks to procure such services in the future.</p> <p>Disclosure could therefore harm Evoenergy's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.</p>	<p>Public disclosure of this information may prejudice future tender processes between Evoenergy and its service providers, as well as commercial negotiations between Evoenergy's related parties and their unrelated customers.</p> <p>Revealing margins paid to parties that operate in a competitive market, could prejudice those providers' commercial negotiations with other clients (who would likely demand terms no worse than those provided to Evoenergy).</p>	<p>While the detriment of publishing the information is clear, Evoenergy is not aware of any material benefit from the AER publishing this information, as opposed to using it on a confidential basis.</p>

Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Attachment 15 Capitalisation policy</b>						
RIN Attachment 15 Capitalisation Policy	Governing principles and processes relating to accounting treatment of the capitalisation of Evoenergy's assets.	Financial Accounting Policy	Strategic information	This concerns commercially sensitive information that are not cost inputs but will nevertheless impact Evoenergy's ability to negotiate in commercial transactions.	This is an internal document containing commercially sensitive information. The detriment would arise from suppliers gaining a competitive advantage in understanding the asset accounting framework and useful lives.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material benefit from the AER publishing this information, as opposed to using it on a confidential basis.
<b>Attachment 16 DAMS Agreement</b>						
RIN Attachment 16 DAMS Agreement	Outsourcing Contract with Jemena Asset Management	Outsourcing Arrangements	Strategic information	The information relates to Evoenergy's outsourcing arrangements (including structure and activity scope). Disclosure could therefore harm Evoenergy's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.	Public disclosure of this information may prejudice future tender processes between Evoenergy and its service providers, as well as commercial negotiations between Evoenergy's related parties and their unrelated customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material benefit from the AER publishing this information, as opposed to using it on a confidential basis.



Reference to document	Description of the confidential information.	Topic of the confidential information	Confidentiality category	Why the confidential information falls into the selected category	How and why detriment would be caused from disclosing	Why the identified detriment is not outweighed by the public benefit
<b>Attachment 17 Cutler Merz report</b>						
RIN Attachment 17 Cutler Merz Benchmarking of Contract Delivery Service Rates	Benchmarking study on Evoenergy contracted rates with related parties	Outsourcing Arrangements	Market sensitive cost inputs	The information relates to Evoenergy's outsourcing arrangements (including structure and activity scope). Disclosure could therefore harm Evoenergy's and other parties legitimate business interests and, ultimately, increase costs passed onto customers.	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 Evoenergy's commercial interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, Evoenergy is not aware of any material benefit from the AER publishing this information, as opposed to using it on a confidential basis.

**Table D.4 Proportion of confidential material – RIN response**

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
RIN Attachment 4 Workbook 1 - forecast - Consolidated Confidential	8	17	25	32%	68%
RIN Attachment 6 Workbook 2-Historical-Consolidated Confidential	6	7	13	46%	54%
RIN Attachment 7 Workbook 2-Historical-Actual	6	7	13	46%	54%
RIN Attachment 8 Workbook 2-Historical-Estimated	6	7	13	46%	54%
RIN Attachment 13 Outsourcing Arrangements	2	13	15	13%	87%
RIN Attachment 15 Capitalisation Policy	22	0	22	100%	0%
RIN Attachment 16 DAMS Agreement	192	0	192	100%	0%
RIN Attachment 17 Benchmarking of Contract Delivery Service Rates	39	0	39	100%	0%

Note: This notice is an approximate indication of the proportion and comparative proportion of material in the Access Arrangement 2021-26 for Evoenergy that is subject to a claim of confidentiality compared to that which is not.