



**Multinet
Gas Networks**

Attachment 1.4B

Confidentiality Claims

Response to AER Draft Decision

January 2023

1 Introduction

We have submitted our GSR Response revision to our Multinet Gas Networks (AGN) Victoria natural gas distribution network (the Network) Access Arrangement (AA) Proposal for the period 1 July 2023 to 30 June 2028 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 call upon commercial and customer sensitive information to ensure the robustness of our response. 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 confidential.

Table 1 of this Attachment summarises all confidentiality claims we have made in relation to the Revised Final Plan. For comprehensiveness, all documents and models provided to the AER with our Revised Final Plan on 24 January 2023 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.

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

Attachment 1.4B 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
MGN GSR Response Overview		Revisions to the Final Plan 2023-28					Not applicable		
Chapter 1 Attachments									
MGN GSR Response Attachment	1.3B	Final Plan document map					Not applicable		
MGN GSR Response Attachment	1.4B	Confidentiality claims					Not applicable		
MGN GSR Response Attachment	1.5B	Post Tax Revenue Model					Not applicable		
MGN GSR Response Attachment	1.6B	Roll Forward Model					Not applicable		
MGN GSR Response Attachment	1.7B	Depreciation Model					Not applicable		
Chapter 5 Attachments									
MGN GSR Response Attachment	5.5	KPMG MGN Customer Engagement Program Phase 4 Findings and Insights					Not applicable		
Chapter 6 Attachments									
MGN GSR Response Attachment	6.7	Response on Future of Gas					Not applicable		
MGN GSR Response Attachment	6.8	Incenta Report on Future of Gas					Not applicable		
Chapter 7 Attachments									
MGN GSR Response Attachment	7.1	Response on Services					Not applicable		
Chapter 8 Attachments									
MGN GSR Response Attachment	8.7	Response on Opex					Not applicable		
Chapter 9 Attachments									
MGN GSR Response Attachment	9.21	Response on Capital Expenditure					Not applicable		
Chapter 10 Attachments									
MGN GSR Response Attachment	10.2	Response on Capital Base					Not applicable		
Chapter 11 Attachments									
MGN GSR Response Attachment	11.2	Response on Financing Costs					Not applicable		
Chapter 12 Attachments									
MGN GSR Response Attachment	12.2	Response on Incentives					Not applicable		
MGN GSR Response Attachment	12.3	Updated ECM model					Not applicable		
MGN GSR Response Attachment	12.4	Updated CESS model					Not applicable		
Chapter 13 Attachments									
MGN GSR Response Attachment	13.1B	Updated Core Energy Gas Demand Forecasting Report					Not applicable		

MGN GSR Response Attachment	13.2B	Updated Demand Forecast Model	Entire document	demand and customer forecasts	Core Energy demand and customer forecasts	Market intelligence	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.	MGN'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.
MGN GSR Response Attachment	13.6	Response on Demand					Not applicable		
Chapter 14 Attachments									
MGN GSR Response Attachment	14.4	Response on Revenue and Prices					Not applicable		
Chapter 13 Attachments									
MGN GSR Response Attachment	15.4	Response on Access Arrangement					Not applicable		
AA and Terms and conditions									
Access Arrangement Document revision		Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 with credit support ammendments (CLEAN)					Not applicable		
Access Arrangement Document revision		Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 with credit support ammendments against AGN AA (MARK UP)					Not applicable		
Access Arrangement Document revision		Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 without credit support ammendments (CLEAN)					Not applicable		
Access Arrangement Document revision		Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 without credit support ammendments against AGN AA (MARK UP)					Not applicable		
Access Arrangement Document revision		Access Arrangement Annexure F General Terms and Conditions (CLEAN)					Not applicable		
Access Arrangement Document revision		Access Arrangement Annexure F General Terms and Conditions against AGN AA (MARK UP)					Not applicable		

Attachment 1.4B 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
MGN GSR Response Overview		Revisions to the Final Plan 2023-28	0.0	27.0	27.0	0%	100%
Chapter 1 Attachments							
MGN GSR Response Attachment	1.3B	Final Plan document map	0.0	2.0	2.0	0%	100%
MGN GSR Response Attachment	1.4B	Confidentiality claims	0.0	2.0	2.0	0%	100%
MGN GSR Response Attachment	1.5B	Post Tax Revenue Model	0.0	14.0	14.0	0%	100%
MGN GSR Response Attachment	1.6B	Roll Forward Model	0.0	12.0	12.0	0%	100%
MGN GSR Response Attachment	1.7B	Depreciation Model	0.0	8.0	8.0	0%	100%
Chapter 5 Attachments							
MGN GSR Response Attachment	5.5	KPMG MGN Customer Engagement Program Phase 4 Final Report	0.0	11.0	11.0	0%	100%
Chapter 6 Attachments							
MGN GSR Response Attachment	6.7	Response on Future of Gas	0.0	18.0	18.0	0%	100%
MGN GSR Response Attachment	6.8	Incenta Report on Future of Gas	0.0	12.0	12.0	0%	100%
Chapter 7 Attachments							
MGN GSR Response Attachment	7.1	Response on Services	0.0	13.0	13.0	0%	100%
Chapter 8 Attachments							
MGN GSR Response Attachment	8.7	Response on Opex	0.0	16.0	16.0	0%	100%
Chapter 9 Attachments							
MGN GSR Response Attachment	9.21	Response on Capital Expenditure	0.0	16.0	16.0	0%	100%
Chapter 10 Attachments							
MGN GSR Response Attachment	10.2	Response on Capital Base	0.0	5.0	5.0	0%	100%
Chapter 11 Attachments							
MGN GSR Response Attachment	11.2	Response on Financing Costs	0.0	5.0	5.0	0%	100%
Chapter 12 Attachments							
MGN GSR Response Attachment	12.2	Response on Incentives	0.0	13.0	13.0	0%	100%
MGN GSR Response Attachment	12.3	Updated ECM Model	0.0	2.0	2.0	0%	100%
MGN GSR Response Attachment	12.4	Updated CESS Model	0.0	10.0	10.0	0%	100%
Chapter 13 Attachments							
MGN GSR Response Attachment	13.1B	Updated Core Energy Gas Demand Forecasting Report	0.0	8.0	8.0	0%	100%
MGN GSR Response Attachment	13.2B	Updated Demand Forecast Model	13.0	0.0	13.0	100%	0%
MGN GSR Response Attachment	13.6	Response on Demand	0.0	6.0	6.0	0%	100%
Chapter 14 Attachments							
MGN GSR Response Attachment	14.4	Response on Revenue and Prices	0.0	11.0	11.0	0%	100%
Chapter 13 Attachments							
MGN GSR Response Attachment	15.4	Response on Network Access	0.0	13.0	13.0	0%	100%
AA and Terms and conditions							
Access Arrangement Document revision		Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 with credit support amendments (CLFAN)	0.0	76.0	76.0	0%	100%
Access Arrangement Document revision		Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 with credit support amendments against AGN AA (MARK UP)	0.0	82.0	82.0	0%	100%

Access Arrangement Document revision	Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 without credit support amendments (CLEAN)	0.0	73.0	73.0	0%	100%
Access Arrangement Document revision	Updated Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 without credit support amendments against AGN AA (MARK UP)	0.0	80.0	80.0	0%	100%
Access Arrangement Document revision	Access Arrangement Annexure F General Terms and Conditions (CLEAN)	0.0	52.0	52.0	0%	100%
Access Arrangement Document revision	Access Arrangement Annexure F General Terms and Conditions against AGN AA (MARK UP)	0.0	53.0	53.0	0%	100%
TOTAL		13.0	640.0	653.0	2%	98%