

**Attachment 1.2**

# **Confidentiality Claims**

**Variation Proposal 2023**

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April 2022

## Introduction

We have developed our Multinet Gas Networks (MGN) Variation Proposal for the six month extension of our Victoria natural gas distribution network (the Network) Access Arrangement (AA) 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 Variation Proposal as possible, however, at times it was necessary to call upon commercial and customer sensitive information to ensure the robustness of our Variation Proposal. 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 this Variation Proposal. For comprehensiveness, all documents and models provided to the AER with our Variation Proposal on 1 April 2022 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 1.2 Table 1

Variation 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
Variation Proposal		Multinet distribution network Access Arrangement Variation Proposal					Not applicable		
<b>Attachments</b>									
Variation Proposal attachment	1.1	Relevant Regulatory Framework					Not applicable		
Variation Proposal attachment	1.2	Confidentiality claims					Not applicable		
Variation Proposal attachment		Post Tax Revenue Model		PTRM Input tab- Customer information cells G:661,M662:663, S662:663, Y662:663, Forecast Revenues tab cells G:66,R67:68, AC67:68, AN67:68	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.	Multinet's customers would be detrimentally impacted if information they provided to Multinet on a confidential basis was released to the public. It could also damage Multinet's competitive position, which would be detrimental to the wider customer base.
Variation Proposal attachment	1.3	Roll forward model					Not applicable		
Variation Proposal attachment	1.4	Depreciation model					Not applicable		
Variation Proposal attachment	1.5	Six month extension opex					Not applicable		
Variation Proposal attachment	1.6	Six month extension capex					Not applicable		
Variation Proposal attachment	1.7	Averaging Period					Not applicable		
Variation Proposal attachment	1.8		Entire document	Averaging period	Averaging period	Market sensitive cost inputs	The averaging period is a key input cost driver	Disclosure of the averaging period will lead to increased financing costs.	Multinet's customers would be detrimentally impacted if Multinet's averaging period was publically disclosed information as the resultant increased costs would be passed on to customers.

Attachment 1.2 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
Variation Proposal		Victoria distribution network Access Arrangement Variation Proposal	0.0	41.0	41.0	0%	100%
<b>Attachments</b>							
Variation Proposal attachment	1.1	Relevant Regulatory Framework	0.0	11.0	11.0	0%	100%
Variation Proposal attachment	1.2	Confidentiality claims	0.0	4.0	4.0	0%	100%
Variation Proposal attachment	1.3	Post Tax Revenue Model	2.0	12.0	14.0	14%	86%
Variation Proposal attachment	1.4	Roll forward model	0.0	12.0	12.0	0%	100%
Variation Proposal attachment	1.5	Depreciation model	0.0	8.0	8.0	0%	100%
Variation Proposal attachment	1.6	Six month extension opex	0.0	6.0	6.0	0%	100%
Variation Proposal attachment	1.7	Six month extension capex	0.0	5.0	5.0	0%	100%
Variation Proposal attachment	1.8	Averaging Period	2.0	0.0	2.0	100%	0%