

## ActewAGL Distribution’s confidentiality claim

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<b>Appendix 5.02</b>	Proposed averaging periods for the annual cost of debt updates for FY17-FY21	Rate of return	Market sensitive cost inputs	Release of this information before the averaging period has passed could affect market behaviour, which could affect ActewAGL	Any adverse change in market behaviour could result in the actual cost of debt to be worse than it would be if the nominated averaging periods were not in the public domain.	There is no material benefit to customers from knowing the future averaging periods in advance. However, it could be significant detriment to ActewAGL and its consumers.

## ActewAGL Gas Access Arrangement Revised Proposal Submission January 2016. Confidentiality Claim

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<b>Appendix 6.01 Capex models</b>	ActewAGL Distribution's capex models	Capex forecast methodology	Market intelligence and market sensitive cost inputs	The models and methodology are proprietary information that if disclosed would reduce the intellectual property ActewAGL Distribution has invested in building the models. The models also contain unit rates, detailed capex programme financial, and strategy information. Publishing the material may prejudice future tender and commercial negotiation processes between ActewAGL Distribution and its potential service providers.	The models and methodology are proprietary information that if disclosed would diminish the intellectual property ActewAGL Distribution has invested in building the model. Public disclosure of the relevant capex information could undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. This is because vendors would gain an insight into how much ActewAGL Distribution has historically paid, or forecast to pay, to establish the required capability. This could set a floor in the market when procuring such services in the future. Disclosure could therefore harm ActewAGL Distribution's legitimate business interests and, ultimately, increase the costs passed on to customers.	While not all capex information in the models is confidential, ActewAGL Distribution provides detailed capex information in its access arrangement information and its public RIN response. ActewAGL Distribution does not consider there would be any additional public benefit to disclosure of the information via the capex model. ActewAGL Distribution (and therefore its customers) should not be funding or producing intellectual property that would benefit those other than ActewAGL Distribution and its customers. Disclosure would reduce ActewAGL Distribution's incentive to produce intellectual property and innovative ways that might enhance the long-term interest of customers.

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<b>Appendix 6.02 HIA Forecasts by dwelling type</b>	HIA forecast by dwelling type	Capex	Strategic Information	ActewAGL Distribution does not own the copyright of the data.	Disclosure of the data could result in compensation claims and loss of ability to source the data in the future for ActewAGL Distribution.	Customers can source this data by purchasing the report. ActewAGL Distribution is also willing to make arrangements to show any interested stakeholder the basis for the data and how it has been used.
<b>Appendix 6.05 Electrical and instrumental holistic audits</b>	Project details	Capex	Market sensitive cost inputs	The documents in this appendix contain detailed capex program financial, strategy and unit rate information. Publishing the material may prejudice future tender and commercial negotiation processes between ActewAGL Distribution and its potential service providers	Public disclosure of this information could undermine the request for quote, request for tender and negotiation strategies to achieve efficient costs. This is because vendors could gain insight into why and when works will occur and the forecast costs, based on confidential unit rates. Disclosure would therefore harm ActewAGL Distribution's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, ActewAGL Distribution is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.

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<b>Appendix 6.06 Facilities compliance project costs</b>	Project details	Capex	Market sensitive cost inputs	The documents in this appendix contain detailed capex program financial, strategy and unit rate information. Publishing the material may prejudice future tender and commercial negotiation processes between ActewAGL Distribution and its potential service providers.	Public disclosure of this information could undermine the request for quote, request for tender and negotiation strategies to achieve efficient costs. This is because vendors could gain insight into why and when works will occur and the forecast costs, based on confidential unit rates. Disclosure would therefore harm ActewAGL Distribution's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, ActewAGL Distribution is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.

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<b>Appendix 6.07 Hot water meter approach</b>	Summary of the hot water meter approach	Capex	Market sensitive cost inputs	The documents in this appendix contain detailed capex program financial, strategy and unit rate information. Publishing the material may prejudice future tender and commercial negotiation processes between ActewAGL Distribution and its potential service providers.	Public disclosure of this information could undermine the request for quote, request for tender and negotiation strategies to achieve efficient costs. This is because vendors could gain insight into why and when works will occur and the forecast costs, based on confidential unit rates. Disclosure would therefore harm ActewAGL Distribution's legitimate business interests and ultimately increase costs passed onto customers.	While the detriment of publishing the information is clear, ActewAGL Distribution is not aware of any material incremental public benefit from the AER publishing this information, as opposed to using it on a confidential basis. Confidentiality arrangements can be put in place to allow access to the information for the relevant interested parties involved in regulatory processes.
<b>Appendix 7.01</b> Revised opex model	UAG wholesale gas forecast	Opex	Market sensitive cost inputs	Commercial contract information	Disclosure of commercial information relating to the contract between the two parties could adversely affect future commercial negotiations for both parties for related services.	There is no public benefit from disclosing contract information.

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<b>Appendix 7.02</b>	Hoskinstown operations and maintenance base year adjustment	Opex	Market sensitive cost inputs	Commercial contract information	Disclosure of commercial information relating to the contract between the two parties could adversely affect future commercial negotiations for both parties for related services.	There is no public benefit from disclosing contract information.
<b>Appendix 10.01</b>  'PTRM input' sheet – Cells: M307:S307  PTRM 'Forecast revenues' sheet –  Cells: Q32:W32, Q84:W84 and Q135:W135	Demand and Forecast revenues	Demand and Forecast revenues	Personal information	Contains easily identifiable personal information relating to individual customers' demand and bills.	This is private information relating to individual customers' demand and/or bills.	This is private information relating to individual customers' demand and/or bills.

## Attachment 2 - Proportion of confidential material

Note: This notice is an approximate indication of the proportion and comparative proportion of material in ActewAGL Distribution’s Gas Access Arrangement Proposal that is subject to a claim of confidentiality compared to that which is not.<sup>1</sup>

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
Response to the AER’s draft decision	0	157	157	0%	100%
Revised Access Arrangement Information	0	56	56	0%	100%
Appendices	111	2183	2294	4.8%	95.2%
<b>Total</b>	<b>111</b>	<b>2396</b>	<b>2507</b>	<b>4.4%</b>	<b>95.6%</b>

<sup>1</sup> Access Arrangement is not included in the above statistics because this is a public document.