Multinet Gas Networks

Attachment 1.4

Confidentiality Claims

Final Plan 2023/24 – 2027/28

July 2022

1 Introduction

We have developed 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 AA Proposal as possible, however, at times it was necessary to call upon commercial and customer sensitive information to ensure the robustness of our AA 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 AA Proposal. For comprehensiveness, all documents and models provided to the AER with our AA Proposal on 1 July 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 1.4 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
Final Plan		Final Plan - Five year plan for our Multinet Gas network					Not applicable		
Chapter 1 Attachments		-Gas network							
Final Plan attachment	1.1	Relevant Regulatory Framework					Not applicable		
Final Plan attachment	1.2	Five year plan for our Multinet network (Draft Plan July 2023 June 2028)					Not applicable		
Final Plan attachment	1.3	Final Plan document map					Not applicable		
Final Plan attachment	1.4	Confidentiality claims							
Final Plan attachment		Post Tax Revenue Model					Not applicable		
Final Plan attachment		Roll Forward Model					Not applicable		
Final Plan attachment	1.6 1.7	Depreciation Model					Not applicable		
Chapter 2 Attachments	1./						Not applicable		
Final Plan attachment	2.1	AGIG Environmental, Social and Governance Report 2021	•				Not applicable		
Chapter 5 Attachments									
Final Plan attachment	5.1	Terms and Conditions Submissions		Signatures, email addresses and telephone numbers	Stakeholder engagement	Personal information	The material contains personal information about an individual or customer whose identity is apparent, or can reasonably be ascertained from the information which raises privacy considerations	Public disclosure of this information raise privacy considerations.	N/A
Final Plan attachment	5.2	Customer and Stakeholder Feedback					Not applicable		
Final Plan attachment	5.3	Summary Tables KPMG Final Report - AGN_MGN Customer Engagement Program					Not applicable		
Final Plan attachment	5.4	Draft Plan Submissions					Not applicable		
Chapter 6 Attachments									
Final Plan attachment	6.1	Future of Gas - our approach to accelerated					Not applicable		
Final Plan attachment	6.2	depreciation KPMG Expert - Future of Gas Report					Not applicable		
Final Plan attachment	6.3	ACIL Allen - Future of Gas model description							
Final Plan attachment	6.4	Incenta Expert Report - Assessment of compliance with the requirements for					Not applicable		
Final Plan attachment	6.5 (1)	AGIG Future of Gas - Buliding Block Model					Not applicable		
Final Plan attachment	6.5 (2)	AGIG Future of Gas - ACIL Allen Consumer Choice Model					Not applicable		
Chapter 7 Attachments		Choice Model							
Chapter 8 Attachments									
Final Plan attachment	8.1	Opex Forecast Model					Not applicable		
Final Plan attachment	8.2	Opex Business Cases	pp. 3-6, 8-15, 61, 62, 64, 67 70, 78, 80, 84	Unit rates, personal	Operating Expenditure	Market sensitive cost inputs and personal information	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers.	quote, request for tender and negotiating strategies to achieve efficient costs.	The actual opex could increase materially if forecast information is r publicly disclosed. This could increase future prices substantially is forecast costs are based on actual incurred information. There is a unlikely to be any material benefit from making this information public.
Final Plan attachment	8.3	BDO - Reclassification of certain programs to	D				Netenelischie		
Final Plan attachment	8.4	Onex from 2023/24 BIS Oxford Economics - Input price					Not applicable		
Findi Fidri attacriment	8.4	escalation Forecasts					Not applicable		

Final Plan attachment	8.5	BIS Oxford Economics Victoria Labour Costs					Not applicable		
Final Plan attachment	8.6	Forecasts ACIL Allen - Opex partial productivity study							
Chapter 9 Attachments							Not applicable		
Final Plan attachment	9.1	Asset Management Strategy	p. 1 pp. 42-43	Supplier names, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	
Final Plan attachment	9.2	Asset Management Plan	36, 37, 39-41, 43-46, 49-51,	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore	
Final Plan attachment	9.3	Capex Forecast Model	Capex Category Summary'! 116:BJ21, 123:BJ25, 127:BJ29, 134:BJ34, 136:BJ38, 140:BJ42	Unit rates	Capital Expenditure and Operating Expenditure		The document contains detail on forecast costs of undertaking works. Publishing the material will prejudice future tender and commercial negotiation processes between MGN and current and potential contractors/suppliers.	information will undermine the request for quote, request for tender and negotiating strategies	Disclosure could harm MGN's legitimate business interests and, ultimately, increase costs passed on to customers. There is unlikely to be any material benefit from disclosing specific cost information to stakeholders.
Final Plan attachment	9.4	Procurement Policy & Procedure			. .		Not applicable		
Final Plan attachment	9.5	Risk Management Framework					Not applicable		
Final Plan attachment	9.6	Unit Rate Report		Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore	
Final Plan attachment	9.7	DMSIP/Mains & Services Strategy	53-58, 60-65,	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	
Final Plan attachment	9.8	Meter Replacement Plan/Meter Strategy	30, 31, 33-36, 41, 43-51, 53-	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	information. There is unlikely to be
							network information.	harm MGN's legitimate business interests.	any material benefit from making this information public.

Final Plan attachment	9.10 (1)	AGIG Network Adaptation Strategy - Renewable Gas	Page 1	Personal Information	Capital Expenditure	Personal information	Personal signatures of employees	Public disclosure of signatures could lead to the signatures being used in an unauthorised	There is no public benefit from the disclosure of personal signatures.
Final Plan attachment	9.10 (2)	Renewable Gas Network Adaptation Plan	pp.1 and 20-23	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information,	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore	
Final Plan attachment	9.11	Network Capacity Strategy		Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	
Final Plan attachment	9.12	Transmission Pipeline Strategy	29-34, 36-40,	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore	
Final Plan attachment	9.13	SCADA Strategy	16, 29-31, 33- 36, 38-40, 43,	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information,	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs. Disclosure could therefore	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 making this information public.
Final Plan attachment	9.14	Supply Regulator Strategy		Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information, information affecting the	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	
Final Plan attachment	9.15	Large Consumer Regulator Strategy		Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	personal information,	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	information will undermine the request for quote, request for tender and negotiating strategies to achieve efficient costs.	

Final Plan attachment	9.16	CathodicProtection Strategy		Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs, personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	quote, request for tender and negotiating strategies to achieve efficient costs.	The actual capex and opex could increase materially if forecast r 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 making this information public.
Final Plan attachment	9.17	Plant and Equipment Strategy	13, 24-29, 31,	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs, personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	quote, request for tender and negotiating strategies to achieve efficient costs.	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 making this information public.
Final Plan attachment	9.18	Gas Heater Strategy	11, 13-15, 22,	Unit rates, personal information and information related to network security.	Capital Expenditure and Operating Expenditure	Market sensitive cost inputs, personal information, information affecting the security of the network	The material contains detail on costs of goods and services and suppliers. Publishing the material may prejudice future tender and commercial negotiation processes between MGN and current and potential suppliers. The are also redactions related to personal information and specific network information.	quote, request for tender and negotiating strategies to achieve efficient costs.	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 making this information public.
Final Plan attachment	9.19	TT Business Cases	pp. 86, 88, 92 and 117	Vendor name	Capital Expenditure	Personal information	The material contains specific vendor names.	Public disclosure of this information may harm MGN's legitimate business interests and commercial relationships.	There is no public benefit from the disclosure of specific vendor information.
Chapter 11 Attachments		-			-				
Final Plan attachment	11.1	Averaging Period	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.	AGN's customers would be detrimentally impacted if AGN's averaging period was publically disclosed information as the resultant increased costs would be
Chapter 12 Attachments				:	-				
Final Plan attachment	12.1	API Performance Targets					Not applicable		
Chapter 13 Attachments									
Final Plan attachment	13.1	Core Energy Demand Forecasting Report					Not applicable		
Final Plan attachment	13.2	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.	competitive market, and disclosing their	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

Attachment 1.4 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
Final Plan		Final Plan - Five year plan for our Multinet network	0.0	151.0	151.0	0%	100%
Chapter 1 Attachments Final Plan attachment	1.1	Relevant Regulatory Framework	0.0	20.0	20.0	0%	100%
Final Plan attachment	1.2	Five year plan for our Multinet network (Draft Plan	0.0	137.0	137.0	0%	
Final Plan attachment	1.3	Tuly 2023. June 2028) Final Plan document map	0.0			0%	
Final Plan attachment	1.4	Confidentiality claims	0.0	10.0	10.0	0%	100%
Final Plan attachment	1.5	Post Tax Revenue Model	0.0	[]]	13.0	0%	ຫຼືການການການການການການການການການການການການການກ
Final Plan attachment Final Plan attachment	1.6 1.7	Roll Forward Model Depreciation Model	0.0 0.0		8.0 20.0	0% 0%	
Chapter 2 Attachments							
Final Plan attachment	2.1	AGIG Environmental, Social and Governance Report 2021	0.0	22.0	22.0	0%	100%
Chapter 5 Attachments Final Plan attachment	5.1	Terms and Conditions Submissions	12	8	20	60%	40%
Final Plan attachment	5.2	Customer and Stakeholder Feedback Summary	0.0		8.0	0%	
Final Plan attachment	5.3	Tables KPMG Final Report - AGN_MGN Customer	0.0		71.0	0%	
Final Plan attachment	5.3 5.4	Engagement Program Draft Plan Submissions	0.0	2		0% 0%	ຫຼືການການການການການການການການການການການການການກ
Chapter 6 Attachments							-
Final Plan attachment	6.1	Future of Gas - our approach to accelerated depreciation	0.0	<u>p</u>	82.0	0%	
Final Plan attachment Final Plan attachment	6.2	KPMG Expert - Future of Gas Report ACIL Allen - Future of Gas model description	0.0	T	19.0	0%	
Final Plan attachment	6.3 6.4	Incenta Expert Report - Assessment of compliance with the requirements for regulatory depreciation	0.0		51.0 46.0	0%	
Final Plan attachment	6.5 (1)	AGIG Future of Gas - Buliding Block Model	0.0	T	10.0	0%	
Final Plan attachment	6.5 (2)	AGIG Future of Gas - ACIL Allen Consumer Choice Model	0.0	22.0	22.0	0%	100%
Chapter 7 Attachments							
Chapter 8 Attachments Final Plan attachment	8.1	Opex Forecast Model	0.0	11.0	11.0	0%	100%
Final Plan attachment	8.2	Opex Business Cases	0.0 19.0		85.0	22%	
Final Plan attachment	8.3	BDO - Reclassification of certain programs to Opex from 2023/24	0.0		15.0	0%	
Final Plan attachment	8.4	BIS Oxford Economics - Input price escalation Forecasts	0.0	38.0	38.0	0%	
Final Plan attachment	8.5	BIS Oxford Economics Victoria Labour Costs	0.0		4.0	0%	
Final Plan attachment	8.6	Forecasts ACIL Allen - Opex partial productivity study	0.0	ñi	48.0	0%	
Chapter 9 Attachments							
Final Plan attachment Final Plan attachment	9.1	Asset Management Strategy	3.0	2		6%	
Final Plan attachment Final Plan attachment	9.2 9.3	Asset Management Plan Capex Forecast Model	37.0 1.0	[]]	72.0 17.0	51% 6%	ຫຼືການການການການການການການການການການການການການກ
Final Plan attachment	9.4	Procurement Policy & Procedure	0.0	become and the second se	17.0	0%	@
Final Plan attachment	9.5	Risk Management Framework	0.0		14.0	0%	ຫຼືການການການການການການການການການການການການການກ
Final Plan attachment	9.6	Unit Rate Report	40.0	[management of the second s	49.0	82%	ຫຼືການການການການການການການການການການການການການກ
Final Plan attachment	9.7	DMSIP/Mains & Services Strategy	32.0	73.0	105.0	30%	
Final Plan attachment	9.8	Meter Replacement Plan/Meter Strategy	47.0	51.0	98.0	48%	52%
Final Plan attachment	9.9	IT Investment Plan	0.0	51.0	51.0	0%	100%
Final Plan attachment	9.10(1)	AGIG Network Adaptation Strategy - Renewable Gas	1.0	2	30.0	3%	
Final Plan attachment	9.10(2)	Renewable Gas Network Adaptation Plan	4.0	22.0	26.0	15%	ຜູ້ການການການການການການການການການການການການການກ
Final Plan attachment	9.11	Network Capacity Strategy	11.0	52.0	63.0	17%	83%

TOTAL			361.0	1869.0	2230.0	16.2	83.8
Access Arrangement Document revision		Access Arrangement Annexure F Terms and Conditions	0.0	52.0	52.0	0%	100%
Access Arrangement Document revision		Access Arrangement for our Multinet natural gas distribution networks 1 July 2023 to 30 June 2028 Clean	0.0	72.0	72.0	0%	100%
AA and Terms and conditions							
Final Plan attachment	15.2	Summary of Changes to the Access Arrangement	0.0	11.0	11.0	0%	100%
Final Plan attachment	15.1	Terms and Conditions - Mulitnet Engagement with Retailers	0.0	23.0	23.0	0%	100%
Chapter 15 Attachments							
Final Plan attachment	14.2	Cost Allocation Model	0.0	8.0	8.0	0%	100%
Final Plan attachment	14.1	Network Pricing, Formulae & Efficiency	0.0	22.0	22.0	0%	100%
Chapter 14 Attachments							
Final Plan attachment	13.3	Weather Normalisation Model	6.0	0.0	6.0	100%	0%
Final Plan attachment	13.2	Demand Forecast Model	17.0	0.0	17.0	100%	0%
Final Plan attachment	13.1	Core Energy Demand Forecasting Report	0.0	0.0	0.0	0%	100%
Chapter 13 Attachments	12.1		0.0	1.0	1.0	070	100 %
Chapter 12 Attachments Final Plan attachment	12.1	API Performance Targets	0.0	1.0	1.0	0%	100%
Final Plan attachment	11.1	Averaging Period	3.0	0.0	3.0	100%	0%
Chapter 11 Attachments	-						
Final Plan attachment	9.19	IT Business Cases	3.0	120.0	123.0	2%	98%
Final Plan attachment	9.18	Gas Heater Strategy	13.0	30.0	43.0	30%	70%
Final Plan attachment	9.17	Plant and Equipment Strategy	17.0	31.0	48.0	35%	65%
Final Plan attachment	9.16	Corrosion Protection Strategy	20.0	35.0	55.0	36%	64%
Final Plan attachment	9.15	Large Consumer Regulator Strategy	15.0	27.0	42.0	36%	64%
Final Plan attachment	9.14	Supply Regulator Strategy	13.0	36.0	49.0	27%	73%
Final Plan attachment	9.13	SCADA Strategy	25.0	39.0	64.0	39%	61%
Final Plan attachment	9.12	Transmission Pipeline Strategy	22.0	32.0	54.0	41%	59%

Final Plan attachment	13.3		Entire document	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.	competitive market, and disclosing their	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
Chapter 14 Attachments Final Plan attachment	14.1	Network Pricing, Formulae & Efficiency	1			Neteralizable		
	14.1					Not applicable		
Final Plan attachment	14.2	Cost Allocation Model	<u> </u>			Not applicable		
Chapter 15 Attachments				*****				
Final Plan attachment	15.1	Terms and Conditions - Mulitnet Engagement with Retailers				Not applicable		
Final Plan attachment	15.2	Summary of Changes to the Access Arrangement				Not applicable		
AA and Terms and conditions								
Access Arrangement Document revision		Access Arrangement for our Multinet Gas natural gas distribution networks 1 July 2023 to 30 June 2028 Clean				Not applicable		
Access Arrangement Document revision		Access Arrangement Annexure G General Terms and Conditions				Not applicable		