

MOORABOOL
Wind Farm

Moorabool Wind Farm Interface Company

Application for Electricity Wholesale Licence

Prepared for: Essential Services Commission, Victoria

8 February 2019

Document:	Moorabool Wind Farm Interface Company Application for Electricity Wholesale Licence
Issue:	Rev 1
Status:	Finalised
Classification:	Public (unless otherwise stated)
Prepared for:	Essential Services Commission Victoria
Prepared by:	Navneet Sharma
Date:	8 February 2019

Document History

Creator	Date	Description	Rev	Reviewed by	Review Date
Navneet Sharma	08 Feb 2019	Issued for Execution	1	Andrew Kerley/Vincent Qiao	8 Feb 2019

Glossary

AEMO	Australian Energy Market Operator
BOP	Balance of Plant
Connection Assets	Connection Assets has the same meaning given to it in the Interface Deed.
EI Act	Electricity Industry Act 2000
ETS	Elaine Terminal Station
EPC	Engineering, Procurement and Construction
ESC	Essential Services Commission
ESC Act	Essential Services Commission Act 2001
ESCV	Essential Services Commission Victoria
Goldwind	Xinjiang Goldwind Science & Technology Co., Ltd (with stock identifiers 002202 on the Shenzhen Stock Exchange and 02208 on the Hong Kong Stock Exchange)
GWA	Goldwind Australia Pty Ltd
GWCA	Goldwind Capital (Australia) Pty Ltd
GWJ	Goldwind International Holding (HK) Pty Ltd
MNWF	Moorabool North Wind Farm
MSWF	Moorabool South Wind Farm
MSWFPL	Moorabool South Wind Farm Pty Ltd
MSWFHPL	Moorabool South Wind Farm (Holding) Pty Ltd
MWF	Moorabool Wind Farm
MWFPL	Moorabool Wind Farm Pty Ltd
MWFHPL	Moorabool Wind Farm (Holding) Pty Ltd
MWFIC	Moorabool Wind Farm Interface Company Pty Ltd
NEM	National Electricity Market
RET	Renewable Energy Target

SHWFPL	Stockyard Hill Wind Farm Pty Ltd
WOM	Warranty, Operations and Maintenance
WTG	Wind Turbine Generator

1. Information on the Applicant and the Nature of Application

1.1 Introduction

In accordance with the *Guidance Notes for Applications for Electricity Licences and the Transfer of Existing Electricity licences* published by the Essential Services Commission and dated November 2006 and discussion on call dated 7/02/2019 Moorabool Wind Farm Interface Company Pty Ltd (MWFIC) wishes to apply for a licence to sell electricity on behalf of Moorabool Wind Farm Pty Ltd (MWFPL) and Moorabool South Wind Farm Pty Ltd (MSWFPL).

The licence is required to allow MWFIC to sell all sent out generation through the spot market and accept payment from AEMO for sent out generation at the spot price applicable at the connection point as per Clause 2.2.4(c) of the National Electricity Rules (NER) and Section 18 of Electricity Industry Act 2000.

Moorabool Wind Farm (MWF) is located approximately 5km south of Ballan, and approximately 67km west of Melbourne, Victoria. The project has development approval of up to 107 WTGs over two sections:

- the Bungeeltap Section (or Moorabool North Wind Farm, MNWF) towards the north of the project site which consists of up to 50 WTGs; and
- the Ballark Section (or Moorabool South Wind Farm, MSWF, being a separate generation license applicant) to the south which consists of up to 57 WTGs.

MWFPL is constructing and owns the MNWF, and a separate entity MSWFPL is constructing and owns the MSWF. MNWF and MSWF are collectively herein referred to as MWF. The relationship between MWFIC and MWFPL and MSWFPL is discussed further in section 1.2.1 below.

In addition to the WTGs, MWF will include the construction of an underground and overhead 33kV electrical reticulation network owned by MWF. MWF will connect to the 220kV/132kV Elaine Terminal Station (ELTS), to connect to the National Electricity Grid. To facilitate this connection to the ETS, an above ground 132 kV transmission line between MNWF and the grid connection point in ELTS (18km from MNWF and 12km from MSWF) will be constructed in accordance with the Connection Services Agreement entered into between MWFIC and Transmission Operations (Australia) Pty Ltd (TOA).

MWFPL and MSWFPL are 100% owned by Goldwind (see section 1.2 for more information on corporate ownership). Goldwind has a leading role in delivering customised energy solutions to meet customer's diverse profiles and needs on a global scale. Goldwind's current global installed wind power capacity is 38GW, with approximately 25,000 installed wind turbine generators (including 21,000 units using advanced permanent magnet direct drive technology) in 17 countries on six continents. Specialising in utility scale projects, Goldwind adapts its best-in-class technology to fit a variety of project opportunities. Goldwind WTGs will be installed across MWF and more information on the use of Goldwind technology in Australian wind farm projects is presented in section 5 of this application.

MWF commenced construction works in June 2018, with the wind farm forecast to commence production in March 2019.

1.2 Information on the Applicant

Legal Name	MOORABOOL WIND FARM INTERFACE COMPANY PTY LTD
ACN	615 752 317
Registered Business Address	Suite 2 Level 23, 201 Elizabeth Street, Sydney NSW 2000
Postal Address	Same as above
Contact Person	Vincent Qiao Investment Delivery Manager – Moorabool Wind Farm [REDACTED] [REDACTED]



1.2.1 Ownership

As presented in Figure 1 below, MWFPL and MSWFPL are 100% owned by holding companies incorporated in Australia. Each of these holding companies are owned by Goldwind International (GWI).

MWFIC is jointly owned by MWFPL and MSWFPL and has been established to facilitate the construction, operation, maintenance and sharing of Connection Assets that allow both MNWF and MSWF to connect to the national electricity network. MWFIC is in the process of registering the MNWF and MSWF as a single generating system at the NEM connection point. MWFIC will procure all electricity delivered from MNWF and MSWF to the NEM connection point and immediately on-sell that electricity to AEMO in the NEM.

A Moorabool Wind Farm Interface Deed (*Interface Deed*- refer Attachment 1) has been drafted to govern the arrangements between MWFPL, MSWFPL and the MWFIC. The Interface Deed provides for:

- MWFIC to be jointly managed by MWFPL and MSWFPL.
- MWFIC to procure the construction, operation and maintenance of the Connection Assets

MWFIC will:

- hold the grid connection agreements.
- operate in the electricity market.
- apportion the grid connection annuity proportionately between MWFPL and MSWFPL.
- be owned 50/50 by MWFPL and MSWFPL.
- be registered with AEMO.

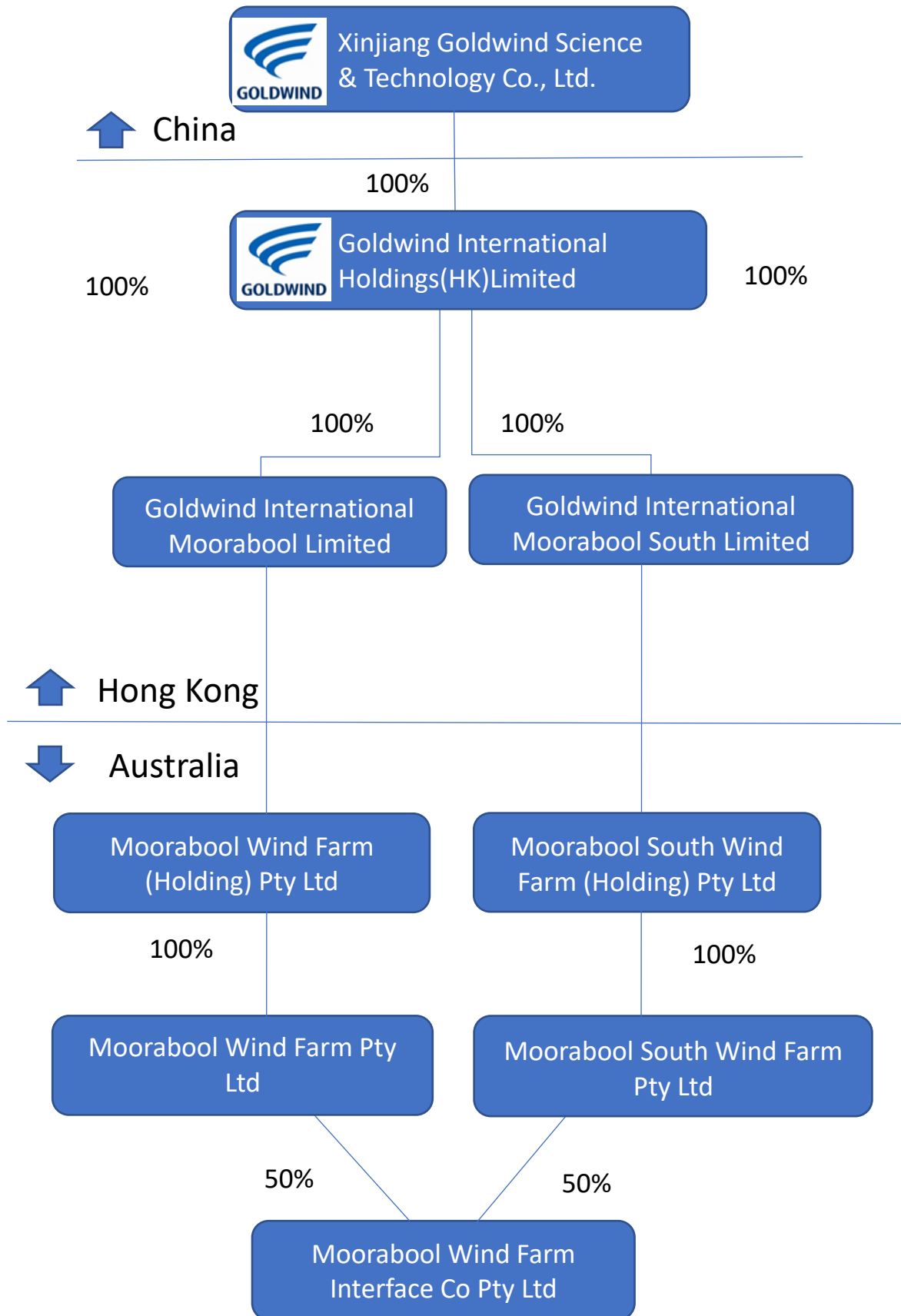


Figure 1 Corporate ownership structure of MWFIC

1.3 Details of contracts

MNWF and MSWF will be constructed under two separate EPC contracts. EPC contracts for MNWF and MSWF provided as an Attachment to separate Generation License applications for MNWF and MSWF lodged with ESCV. Under the EPC contracts, Goldwind Australia (GWA) as EPC contractor executed a WTG supply agreement for the procurement of the WTGs and towers and engaged and continue to manage sub-contractors to complete the balance of plant works.

MWFIC has entered into a suite of agreements relating to the construction and ongoing service and operation of infrastructure to connect to the national electricity grid (the **Grid Connection Agreements**), including:

- Use of System Agreement¹
- Project Agreement²
- Connection Services Agreement³
- Project Coordination Deed⁴

Through the first 10 years of operations of MWFPL and MSWFPL will enter into a WOM contract with GWA to provide services for the operation and maintenance of the wind farm. Under the WOM contract, MWFPL and MSWFPL may extend beyond the 10-year term by a further period of 5 years..

Figure 2 below presents a project contracts structure detailing these contract arrangements.

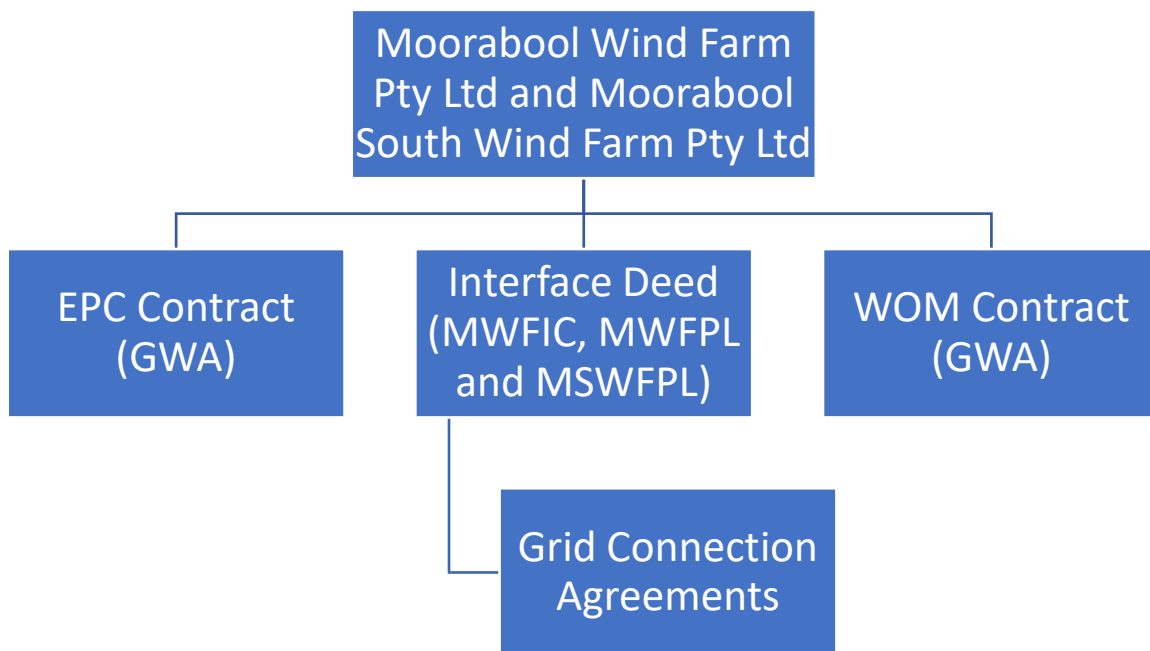


Figure 2 project contracts structure of the Moorabool Wind Farm Pty Ltd

1.3.1 Summary of experience of key personnel

As mentioned above, operation and maintenance of MWF will be provided by GWA via a WOM contract. The following personnel will form a key part of the WOM team who will operate and maintain the WTGs at MWF.

¹ Attachment 47 Use of System Agreement

² Attachment 48 Project Agreement

³ Attachment 49 Connection Services Agreement

⁴ Attachment 50 Project Coordination Deed

Rob Brady

Rob has more than 25 years' experience within a Service and Maintenance environment. His knowledge stems from his early working career employed as an electrical technician servicing large industrial fire protection system installed within petro-chemical plants, large manufacturing facilities and multi-story commercial buildings to more recent duties such as the management of sites like the Thames flood barrier in London and the Dungeness Nuclear Power Station in South East England. For most of his working life, Rob has been involved in servicing products for large commercial customers across the construction, manufacturing industries and within the building services sector.

Rob first moved into a managerial role more than 10 years ago, since that time he has been employed by large, multi-national organisations. Commencing his career in electrical service, he has continued to gain considerable experience in customer management, contract management and employee development. Rob has worked closely across organizational departments such as Technology R&D, Engineering, Sales and Finance.

Matt Dickie

Matt is a professionally qualified Mechanical Engineer with over 20 years' experience. Matt has over seven years' experience in the wind industry, working at Vestas Australia in service. At Vestas, Matt managed service contracts for the Lake Bonney 1, 2, 3 and Alinta wind farms for Infigen Energy, and Canunda windfarm for Engie. Matt looked after 189 turbines amounting to 413 MW. Matt also rolled out Lean to all Vestas windfarms in Australia and New Zealand during this period and was involved in several initiatives to improve Vestas' service offering, using his six-sigma blackbelt qualification. Prior to Vestas, Matt held several positions at Ford and Prodrive, in engineering and management roles. Matt joined GWA in October 2016 as Service Manager, and is responsible for Mortons Lane Wind Farm, Gullen Range Wind Farm, and White Rock Wind Farm.

Travers Wilson

Travers has 20 years' experience in the renewable energy, power and industrial services sectors, working within operations, maintenance and project delivery for various technologies including Wind, Hydro, Solar Thermal and Co-generation.

Travers previously worked for WorleyParsons for 5+ years as site lead for distributed Combined Heat & Power and Hydro-electric turbines sites, within the Sydney Water Renewable Energy Generating Alliance.

More recently, working for TW Power services, managing projects and technical assignments for various clients including Wind Farm O&M Contract Transition Manager (Pacific Hydro), Capital Spend Review Technical Lead for Appin and Tower Power Station's (South 32), Project Manager for Cogeneration O&M Technical Review (Allwater S.Aus), Project Manager for Liddell Solar Thermal Recommissioning and Operations (AGL), Project Manager for Hau Nui Wind farm EoC Inspections (Genesis Energy, NZ), Project Manager for Wind Turbine Integrity Inspection (Ratch Corporation Australia).

Please refer to Attachment 8 for a summary of directors and Key personnel of MWF.

1.4 Information regarding application

1.4.1 Type of licence sought

MWFIC is applying for a licence from ESCV to sell electricity from the MNWF and MSWF for supply or sale to the NEM. MNWF and MSWF as the parties who own the generating assets have lodged separate Generation Licence Application with ESCV.

1.4.2 Date from which Licence is sought

4th March 2019.

1.4.3 Nature and scope of operations for which the licence is sought

MWF will consist of 104 Goldwind WTGs capable of generating a combined total of up to 312 MW and a wholesale licence is required to sell the output of electricity generated by MWF in Victoria to AEMO in NEM.

MWF is being constructed on crop/gazing land leased from local landowners. The construction has commenced, and the wind farm is expected to commence generating electricity in March 2019.

Land required for Transmission line route, where it's not a part of the wind farm lease, is secured by easements, or consent from DELWP in relation to crown land (please see Attachment 46 for DELWP consent). Please also refer to Attachment 34 for copies of these land agreements. Please see Attachment 45 for the consent from DELWP which gives MWF permission to use roads owned by the Victorian Government.

1.4.4 Details of current or former licences held in this and/or other jurisdictions

MWFIC has no current or expired licence in Victoria or any other jurisdictions.

1.4.5 Previous unsuccessful licence applications sought in this and/or any other Jurisdictions

None.

1.4.6 Licences held by associates of the applicant

Goldwind, the ultimate owner of MWFIC, also owns Stockyard Hill Wind Farm Pty Ltd (SHWFPL). An electricity generation licence has been issued by the ESC to SHWFPL on 24 October 2012.

1.4.7 Licence Conditions

MWFIC is not seeking any non-standard licence conditions.

1.4.8 Incorporation details

The Certificate of Registration for MWFIC is provided in Attachment 58.

The Constitution of MWFIC is provided in Attachment 59.

2. The Objective of the Commission

The objective of the Commission set out under sub-section 8(1) of the ESC Act is “to promote the long-term interests of Victorian consumers in performing its functions and exercising its powers” (**Objective**).

The applicant believes that the granting of the licence to MWFIC is consistent with this Objective as MWF is a financially viable generator for the following reasons:

a) Price, quality and reliability

As a wind energy generator, MWF will increase and diversify the supply, quality, reliability, enhance competition and help in reducing the cost of energy in Victoria.

b) The efficiency in regulated industries and the incentive for efficient long-term investment

MWF is an efficient long-term electricity industry investment for the state of Victoria as it will augment part of the national electricity network, contribute towards meeting the RET set out by Australian Government and the Victorian renewable energy target set by the Victorian government. MWF has an intended operational life of at least 20 years.

c) The financial viability of the industry

MWF will make a positive contribution to the financial viability of the AEMO. Also, MWF is a financially viable generator, underpinned by long-term contracts, and supported by major industry players.

d) The degree of, and scope for, competition within the industry, including countervailing market power and information asymmetries

The granting of the licence is consistent with the objective as it will result in the creation of new electricity generation and will improve the competitiveness of renewable electricity power generation in the national electricity market. Increased electricity supply has the potential to lower market spot prices.

e) The relevant health, safety, environmental and social legislation applying to the industry

The granting of the licence is consistent with the objective having regard to this matter because the development and operation of MWF will be subject to all relevant health, safety, environmental and social legislation applying to the Victorian electricity industry. The externalities of electricity generated by MWF, as a wind farm, including health, safety, environmental and social costs, will be low.

The Minister for Planning originally granted planning approval for the MWF in 2010. Since then, the Planning Permit has been amended to facilitate larger WTGs to be installed at the site, and administrative amendments. The latest version of the Planning Permit is available to the public at the MWF website (<http://mooraboolwindfarm.com/the-project/project-approvals>).

f) The benefits and costs of regulation (including externalities and the gains from competition and efficiency) for

i. Consumers and users of products or services (including low income and vulnerable consumers)

MWF is forecast to generate approximately 1,000,000 MWh of electricity annually which will allow consumers and users of electricity (including low income and vulnerable consumers) to receive the benefits of increased renewable electricity supply. These benefits include reduced cost, and increased reliability and quality, of electricity supply, including environmental and health costs.

ii. regulated entities;

The granting of the generation licence to MWFIC is consistent with this objective as Granting of the licence will minimise the costs of regulation to MWIC and allow other regulated entities such as electricity retailers to access the benefits of increased renewable generation capacity.

g) Consistency in regulation between States and on a national basis

The granting of the generation licence to MWFIC is consistent with this objective as MWIC is bound by the rules set by the Australian Energy Regulator under national energy legislation and rules. Electricity generated by MWF will be sold into the wholesale spot market. MWF will also generate large-scale generation certificates (LGCs) under the Renewable Energy (Electricity) Act 2000.

h) Any matters specified in the empowering instrument

As per section 10 of the EI Act, the objectives of the Commission include “to promote the development of full retail competition”.

The granting of the wholesale licence is consistent with these objectives as investment in generation capacity will increase the supply of electricity available to be purchased by retailers, which will increase the viability of retailers and allow them to compete more effectively, therefore promote the development of full retail competition.

3. Information on Financial Viability

MWFIC can meet and address the financial viability requirement. MWFIC is equally owned by MNWF and MSWF which ultimately 100% owned by Goldwind (refer Figure 1), a global WTG manufacturer. Goldwind holds more than 38 GW of renewable generation capacity installed globally.

- As the end of Dec 31st, 2016, Goldwind's international contract capacity (i.e. capacity outside of China) almost reached 2GW and more than 700 units of WTGs delivered to nearly 20 countries across six continents
- In the year 2016 Goldwind is ranked No.3 in the world for new wind turbine installation capacity, with 6.4 GW newly installed during the year 2016.

3.1 Current balance sheet and financial data

Please see Attachment 51 for MWF audited financial report for the year ended 31 Dec 2017.

3.2 Annual Report

The annual report of parent company Goldwind is in attachment 26.

3.3 Credit Rating

Goldwind, the ultimate parent company has the credit rating BBB- which means MWFIC has adequate capacity to meet its financial commitments.

3.4 Statements from internal/external auditors

Independent Auditor's report and Auditor's Independence Declaration to the Directors of MWFHPL and MSWFHPL from Ernst & Young are provided to ESCV.

3.5 Shareholder register

See Register of Members of MWFIC Attachment 60.

3.6 Certificate of registration

Please see Attachment 58 for MWFIC Certificate of Registration.

3.7 Statements from banks/financiers, shareholders, the board or the parent Company

The sources of funds provided in the Financial Model Attachment 38 will be in 2 parts, equity (approximately 30% of capital expenditure) and a bank/credit facility (for approximately 70% of capital expenditure).

3.8 Assurance of sufficient financial resources

MWFIC assures the commission that it has sufficient financial resources to sustain its operations including meeting all prudential requirement set by AEMO (credit support letter issued by AEMO and MWFIC is in the process of issuing the bank guarantee to AMEO) and transmission network service operators.

4. Information on Technical Capacity

MWFIC, via MWFPL and MSWFPL, will engage the necessary expertise, knowledge and skill base to operate a viable electricity wholesale business. GWA has a strong track-records of successfully constructing, owning and operating viable wind and solar farms in Australia.

Operation and maintenance of MWF will be provided by GWA via the WOM contract. GWA operates and maintains over 350MW of wind farm generation capacity in Australia. Goldwind utilises over 20 years of experience in all aspects of windfarm development including planning, construction, manufacturing and operation. Goldwind has relevant internal controls, policies and procedures in place to ensure operation and maintenance obligations set in relevant licence conditions, codes, guidelines and rules are met, as evidenced by the attached supporting documents see Attachment 16,17,18 and 19.

4.1 Organisational chart of key personnel with details of experience and knowledge

Refer to section 1.3.1.

4.2 Contracts with external service providers

Refer to section 1.3.

4.3 Statements from industry bodies and regulators

Refer to section 5.5.

4.4 Internal controls, policies and procedures

MWF will be constructed and operated in accordance with the internal controls, policies and procedures of GWA, tailored for the specific requirements of MWF. These policies are consistent with industry standards and best practice.

Internal controls, policies and procedures include:

- Moorabool Wind Farm Environmental Management Plan (See Attachment 15)
- Goldwind Australia HSEQ Risk Management Procedure (See Attachment 23)
- Moorabool North and South Wind Farm Construction WHS Management Plan (See Attachment 29)
- Goldwind's OH&S Policy (See Attachment 17)

4.5 Risk management policies

See Attachment 23 and 24 for risk management process and risk register

The MWF operational management plan (OMP) sets out the operational risk management strategy for the proposed generation activity. Please see Attachment 55 for the MWF OMP.

4.6 Australian Financial Services Licence (if applicable)

MWFIC is not required to obtain an Australian Financial Services Licence as it has no PPA and does not intend to undertake any of the activities which require an Australian Financial Services Licence i.e.:

- provide financial product advice to clients
- deal in a financial product
- make a market for a financial product
- operate a registered scheme
- provide a custodial or depository service, or
- provide traditional trustee company services

4.7 Complaints register and procedures

MWFPL and MSWFPC use Darzin platform for complaint management. Darzin is the stakeholder data management software to record interactions with relevant stakeholders on a per project basis. Please see Attachment 42 for the MWF Complaints and Enquiries Policy. Darzin has the following primary functions:

Complaints register

Darzin maintain a complaint register for MWF. This register may be required for scheduled or unscheduled compliance reporting to the relevant government department and/or be required to be published as a public register on the project website.

Record of historic interactions

Historic record of interactions with a stakeholder may be required months or years after the interaction has taken place. This may be for compliance reporting purposes, to assist in dispute resolution or to provide a historic context of a stakeholder's relationship with the project. Having a record of the historic interactions assists with the continuity of relations with a stakeholder even if there is a change of project staff.

Database for contact details for stakeholders

All available contact details for stakeholders, including phone numbers, emails etc. The system also captures key stakeholder information which assists with continuity of relations.

MWFIC, via MWFPL and MSWFPL, will continue to use Darzin as a centralised database for tracking material stakeholder and community interactions during the construction and operational phases of MWF.

4.8 Privacy statements

MWFIC, via MWFPL and MSWFPL, commits to keeping information collected during the course of the project private and confidential, as described further in GWA Privacy Policy and Enquiries and Complaints Handling Plan.

4.9 Document retention policies

MWFIC, via MWFPL and MSWFPL retains documents in its document management system for durations that meet the statutory retention periods. Please see Attachment 44 for GWA's Control of Records Procedure.

4.10 Industry submissions and results of any research supporting the application

As specified in section 3 planning permit, development plans and management plans have been approved and endorsed by minister.

5. Information in support of a generation licence application

5.1 Details of experience in and knowledge of the electricity industry

Goldwind WTGs are currently installed in three operational wind farms in Australia: Mortons Lane Wind Farm (19.5MW, located Victoria), Gullen Range Wind Farm (165.5MW, located in southern New South Wales), and the newly commissioned White Rock Wind Farm (170MW, located in northern New South Wales). Each of these wind farms was constructed by GWA as the lead contractor, in accordance with the necessary regulatory requirements.

GWA has established a dedicated local team of highly experienced and qualified operation and maintenance personnel to manage its operating wind farms in Australia. A global logistics network and local supply of strategic spares enables the team to provide fast access to spare parts for our customers. Goldwind operates and maintains approximately 9000 MW of windfarm generation capacity and 38 GW of accumulated installed capacity internationally. Goldwind utilises over 25 years of experience in all aspects of windfarm development including planning, construction, manufacturing and operation. Each wind farm is connected live to the Goldwind Remote Operating Centre – an off-site facility providing real time 24/7 wind farm operations and maintenance monitoring. This enables our technicians the ability to respond to emergency after hour requirements within agreed timeframes. GWA has a national operation and maintenance team comprising of:

- skilled wind turbine technicians
- wind farm operation managers
- high voltage operators
- localised technical support teams
- performance analysts
- warehousing solutions
- real time wind farm monitoring and control
- rapid response programs
- pre-qualified suppliers of goods and services

Goldwind implemented relevant internal controls, policies and procedures to ensure operation and maintenance obligations set in relevant licence conditions, codes, guidelines and rules are met.

5.2 A summary of the skills and experience of the directors and senior managers and their relevance to meeting the requirements of the licence

MWFIC's sole director is Ning Chen. Ning has over 10 years relevant experience working in the energy sector in Australia and over 12 years working with the Goldwind group of companies in various roles including:

- Formulate and implement investment strategies and annual plans;
- Establish and perfect investment management system; and
- Provide systematic solutions related to business development, construction, EPC and service.

Ning played an instrumental role in the establishment of Goldwind's business in Australia. He is a key member of the senior management team in Australia and Goldwind International. He is the Vice President and a director of Goldwind Australia Pty Ltd (ACN: 140 108 390) (**GWA**), General Manager and a director of Goldwind Capital (Australia) Pty Ltd (ACN: 142 403 950) (**GWCA**) and Vice President and director of Goldwind International Holdings (HK) Limited (**GWI**).

Ning leads Goldwind's investment & development team in Australia and manages investment, financing, acquisitions and divestments of Goldwind renewable energy projects in the Asia Pacific region, North America, South America and Europe. See attachment 8 for more key staff details.

5.3 Evidence that the applicant has the capacity to comply with the licence conditions, codes and guidelines relevant to its application

MWFIC is confident that it has all necessary expertise to comply with the relevant license conditions, codes and guidelines. The skills and experience of key personnel, Internal Controls, Policies and Procedures (see Attachments 8, 16, 17 and 18) show the relevance and breadth of experience of the team responsible for MWFIC.

5.4 Evidence of any interactions or preliminary registration with AEMO

MWFIC is in process of registering as a market participant with AEMO. On 17th Oct 2018 MWFIC lodged a Generator Registration Application with AEMO and on 24th Oct 2018 AEMO confirmed registration of MWFIC as an intending Market participant in respect to MNWF and MSWF.

MWFIC progressed expressively with AEMO registration application with positive expectation of registering MWFIC with AEMO by March 2019.

5.5 Relationships between supporting organisations

Section 1.3 shows the contractual relationships between the supporting organisations.

5.6 Confirmation that all planning and environmental approvals have been completed

MWF has received Planning Approval from the Minister for Planning in 2010, which was subsequently amended in 2016 and 2018. Please see Attachment 36 for the amended planning permit issued by Department of Environment, Land, Water and Planning (DELWP) on 19th March 2018.

Acting in accordance with condition 3 of the Planning Permit, the development and management plans required by the planning permit have been approved. Please see attachment 21,22 and 40 for the endorsed development and management plans.

The following planning and environmental approvals associated with the 132kV transmission line have also been granted.

- EPBC referral decision associated with the OHL - see Attachment 61.
- The use and develop of a minor utility installation (wires -no poles) over a Public Conservation and Recreation Zone (PCRZ) - see attachment 52.
- Removal of native vegetation associated with a minor utility installation - see Attachment 53.
- Transmission line Cultural Heritage Management Plan - see Attachment 35.

5.7 Risk, governance and compliance management and strategies

MWFIC, via MWFPL and MSWFPL, has in place risk, governance and compliance management procedures.

All risks, including compliance with laws, regulations and permit/licence conditions, are managed under the MWF Risk Management Plan/Procedures in accordance with ISO 31000:2009(E) and Goldwind's internal controls, policies and procedures. For details of MWF governance policies (See Attachment 23 – HSEQ Risk Management Procedure and Attachment 24 -Risk Register).

And compliance register see attachment 56 for compliance requirements for permit conditions and approvals and Attachment 62 for regulatory compliance

5.8 Evidence that demonstrates that the entity can successfully operate a business within the electricity industry

Goldwind as the ultimate shareholder of MWFIC and GWA as the operator of MWF, have strong track records of successfully operating businesses in the electricity industry. Refer to section 1.1 for details of GWA's track-records of successfully operating in the Australian electricity industry.

1. List of attachments

The attachments below marked commercial-in-confidence are excluded from the public due to the commercially sensitive or confidential information contained therein.

- Attachment 1** Moorabool Wind Farm Interface Deed (commercial-in-confidence)
- Attachment 2** Not used
- Attachment 3** Not used
- Attachment 4** Not used
- Attachment 5** Not used
- Attachment 7** Not used
- Attachment 8** Summary of directors and key personnel (commercial-in-confidence)
- Attachment 11** Appendix A 2.16 corrected Planning Permit 05102017
- Attachment 12** Standard Balance Sheet –(commercial-in-confidence)
- Attachment 13** Standard Balance Sheet - (commercial-in-confidence)
- Attachment 14** MWFPL and MWFHPL_Financial Report (SIGNED) (commercial-in-confidence)
- Attachment 15** Environmental Management Plan (commercial-in-confidence)
- Attachment 16** Environmental Policy (commercial-in-confidence)
- Attachment 17** WHS Policy (commercial-in-confidence)
- Attachment 18** Quality Policy (commercial-in-confidence)
- Attachment 19** Privacy Policy
- Attachment 20** MB-PM-PLN-0062 MWF Enquiries and Complaints Handling Plan
- Attachment 21** Stage 1A Endorsed Development Plans
- Attachment 22** Stage One B Endorsed Development Plans
- Attachment 23** Goldwind Australia HSEQ Risk Management Procedure (commercial-in-confidence)
- Attachment 24** Risk Register (commercial-in-confidence)
- Attachment 25** Risk Assessment Report
- Attachment 26** Xinjiang Goldwind Annual Result
- Attachment 27** Financial Model Information (commercial-in-confidence)
- Attachment 29** Goldwind Workplace Health and Safety Management Plan for MWF
- Attachment 30** Not used
- Attachment 31** Not used
- Attachment 32** Not used
- Attachment 33** Generation Licence – SHWF
- Attachment 34** Land Agreements (commercial-in-confidence)
- Attachment 35** OHPL CHMP Approval

- Attachment 36** Moorabool WF permit amendment
- Attachment 37** Share Structure
- Attachment 38** Financial Model Enquired Information - MN 180416-v1 (commercial-in-confidence)
- Attachment 40** Endorsed MNWF management plans
- Attachment 41** Not used
- Attachment 42** Complaints and Enquiries Policy
- Attachment 44** Control of Records Procedure
- Attachment 45** Crown land consent
- Attachment 46** DELWP Consent along PCRZ
- Attachment 47** Moorabool - UoSA (commercial-in-confidence)
- Attachment 48** Project Agreement (commercial-in-confidence)
- Attachment 49** CSA (commercial-in-confidence)
- Attachment 50** Amended PCD (commercial-in-confidence)
- Attachment 51** Moorabool Wind Farm_Financial Report_Final (commercial-in-confidence)
- Attachment 52** PCRZ Permit
- Attachment 53** Permit PA1700307 - 14.05.2018 NV removal for OHL
- Attachment 55** MWF Operational Management Plan
- Attachment 56** MWF Compliance Register-Planning (commercial-in-confidence)
- Attachment 57** Not used
- Attachment 58** Certificate of Registration – MWFIC
- Attachment 59** Constitution – MWFIC (commercial-in-confidence)
- Attachment 60** Register of Member - MWFIC
- Attachment 61** EPBC Referral OHL
- Attachment 62** Compliance Register (commercial-in-confidence)
- Attachment 63** MNWF WOM Contract (commercial-in-confidence)

2. Statutory Declaration

I, Ning Chen of

Suite 2, Level 23, 201 Elizabeth Street, Sydney NSW 2000

being the sole director and sole company secretary

of the Applicant, Moorabool Wind Farm Interface Co Pty Ltd (ACN: 615 752 317) Hereby DECLARE that the information contained in this application, thereto upon which I have placed my signature, for the grant of a Electricity Generation licence under the Electricity Industry Act 2001 is true and correct and that I make this declaration conscientiously believing the same to be true and in the belief that a person making a false declaration is liable to the penalties of perjury.

Declared at Sydney in the State of New South Wales



Signature of Declarant

This day of 11 day of Feb 2019

Before me, Navneet Sharma

(A person authorised by section 107A of the Evidence Act 1958 (Vic))



.....
Signature of Witness