



Application for Licence to Generate Electricity for Supply or Sale

Yatpool Sun Farm Pty Ltd

Public submission

Essential Services Commission



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1 Information on the Applicant and nature of the application

1.1 Introduction

Yatpool Sun Farm Pty Ltd (*YSF* or *Applicant*) is applying for a licence to generate and transmit electricity from a 106.4MW_{DC}/81 MW_{AC} Solar Farm that is being built approximately 20km south of the town of Mildura, Victoria. The Yatpool Solar Farm (YSF) will be owned and operated by YSF Pty Ltd, which is ultimately owned by BayWa r.e. renewable energy GmbH according to the corporate structure provided in Figure 1. It is expected that the project will be fully energised by 15 July 2019.

The farm will consist of the following components that are being procured from the suppliers SMA¹, Renovagy², Astronergy³, GCL⁴, and Nextracker⁵:

- 327,613 polycrystalline modules⁶ (Solar photovoltaic modules)
- 36 central inverters⁷ (MVPS 5500-S-AU)
- Single axis solar tracking system⁸ rated for 106.4MW_{DC} as required
- AC and DC cabling
- 1 x 100MVA Transformer
- 10 x 5MVA Medium Voltage Power Stations (MVPS)
- 8 x 5.5MVA MVPS
- RMU/Switchgear

The contract for Engineering, Procurement, and Commissioning (EPC) is being awarded to Energy Solutions Pty Ltd (*Beon* or *Contractor*). The parent company to the applicant (BayWa r.e.) has good relations with Beon as they recently collaborated on a 112MW_{DC} solar farm in Karadoc, Victoria. The Karadoc project is currently functioning at full capacity, and BayWa r.e. intends to oversee the Operations and Maintenance (O&M) of the project for the next 10 years.

The full land lease agreement for the YSF project was executed on 14 February 2017, and the Generator Deed with Powercor executed on 4 April 2017. Development of the project began in Q4 2016. A Power Purchase Agreement (PPA) has been made for 35% of the plant's annual output as per section 1.6. A generator licence is required by 15 July 2019 since the farm will be energised on this date.

The Mildura Rural City Council has approved all planning permits⁹ for the project to allow for use and development of the land for a renewable energy facility. Following commissioning of the project, BayWa r.e. plans to undertake O&M as well as asset management for a period of 10 years. The

¹ See website <https://www.sma-australia.com.au/>

² See website <https://www.renovagy.es/en/>

³ See website <http://energy.chint.com/en/>

⁴ See website <http://www.gcl-poly.com.hk/en/>

⁵ See website <http://www.arraytechinc.com/>

⁶ See attachment 1

⁷ See attachment 2

⁸ See attachment 3

⁹ See attachment 4

capability of BayWa r.e. has been proven through their maintenance of 4500MW of renewable energy projects globally including the O&M for the Hughenden and Karadoc Solar Farms in Australia.

1.2 Applicant Details

The details of the Applicant applying for a generator licence are provided in Table 1.

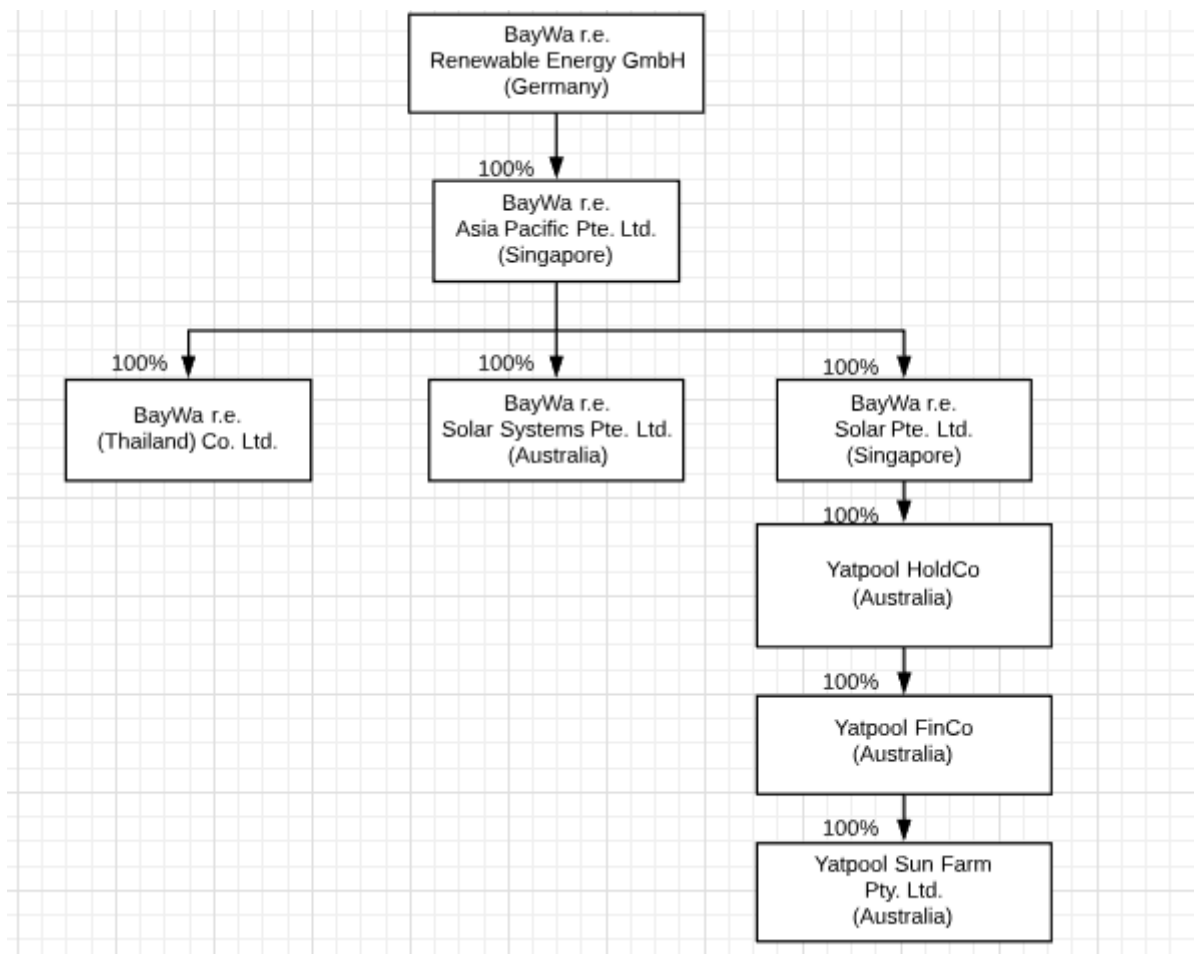
| | |
|------------------------------------|--|
| Applicant's name | Yatpool Sun Farm Pty Ltd |
| ABN | 83 610 306 324 |
| Registered business address | Level 1, 79-81 Coppin Street, Richmond VIC 3121, Australia |
| Contact person | Krish Karimbil, |
| Incorporation details | Yatpool Sun Farm Pty Ltd was incorporated on the 20th of January, 2016 ¹⁰ |

Table 1: Applicant details

1.3 Corporate Structure

Yatpool Sun Farm is a subsidiary of a structure of companies and is directly owned and managed by Yatpool FinCo Pty Ltd. Figure 1 shows this structure in its entirety.

Figure 1: Corporate structure

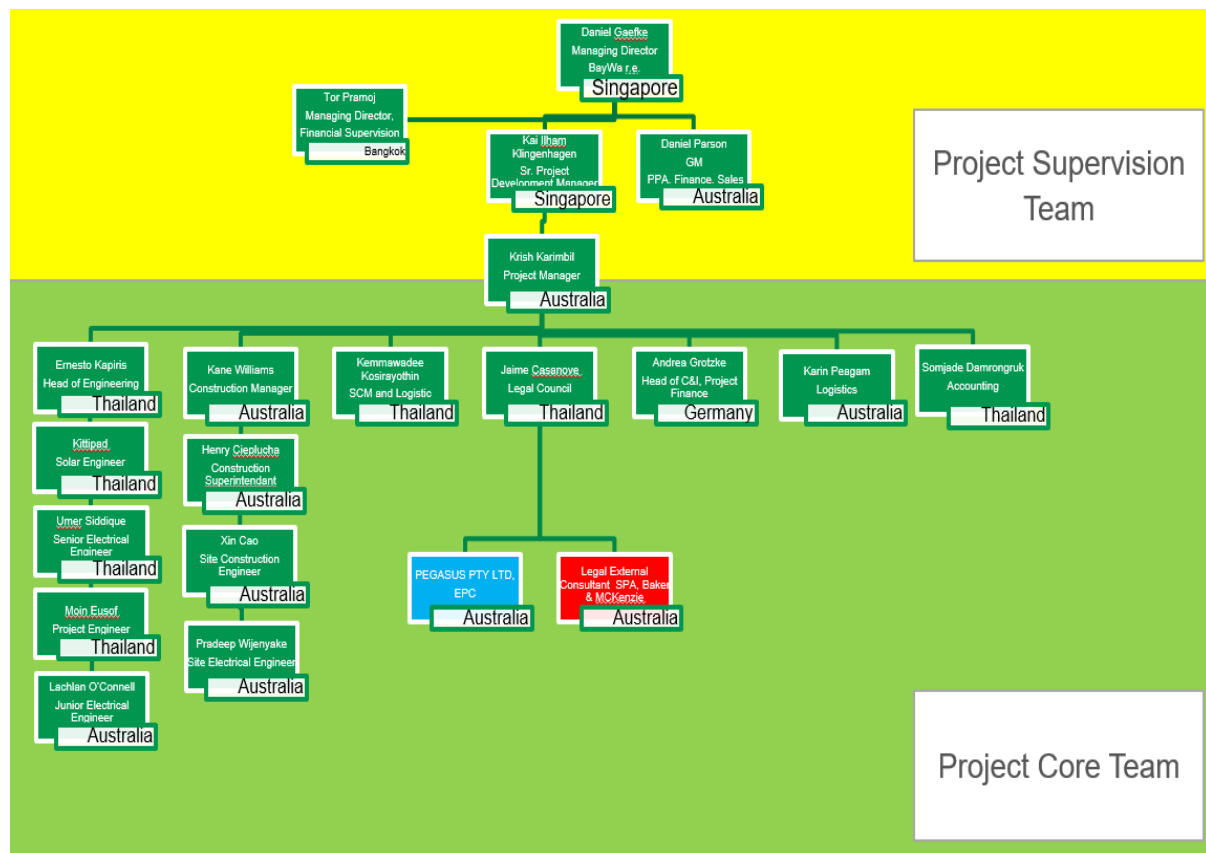


¹⁰ See attachment 5

1.4 Organisational Structure

The organisational structure of the Applicant is provided below in Figure 2.

Figure 2: Project organisational structure



1.5 Experience of key personnel

The long-term experience of some of the key personnel working directly with the solar farm project will contribute greatly to the project's success. A summary of these key members' experience is provided in attachment 6. The project team is backed by the company BayWa r.e. Renewable Energy GmbH as is shown in figure 1. BayWa r.e. has delivered 142 solar projects around the world and currently manage approximately 1300MW of solar energy in various regions:

- North America: 13 solar projects with 57MW installed
- EMEA: 129 solar projects with 557MW installed
- Asia-Pacific: 4 solar projects with 230MW installed

Most recently, BayWa r.e. constructed the Karadoc Solar Farm in Victoria where Beon undertook the design and construction of the project. The site consisted of approximately 346,000 solar panels, and the closely adhered to the schedule specified by Beon. A PPA for the project was secured for 33% of the annual output, and BayWa r.e. will be overseeing the O&M for the project for the next 10 years. With this being their largest scale project in Australia, BayWa r.e. utilised their resources efficiently to bring their expertise into a market previously unknown to them.

1.6 Contracts and agreements

| Contract/Agreement | Related party |
|--|--|
| Engineering, Procurement, and Commissioning (EPC) Contract ¹¹ | Energy Solutions Pty Ltd |
| Power Purchase Agreement ¹² | Flow Power |
| Yatpool Sun Farm Lease ¹³ | Ian Keith McNabb and Elizabeth Anne McNabb |
| Access Road Works ¹⁴ | Waters Excavations |
| Generator Deed ¹⁵ | Powercor Australia Limited |
| O&M Agreement ¹⁶ | BayWa R.E. Solar Projects Pty Ltd |

Table 2: Contracts and agreements

1.7 Planning and Environment

1.7.1 Cultural Heritage Management Plan

The site for the Yatpool Solar Farm was examined by Archaeology at Tardis¹⁷ via the GeoVic online mapping application and was assessed against the Aboriginal Heritage Regulations 2007. It was determined that since the area was not situated within a legislated area of Aboriginal cultural heritage sensitivity, a Cultural Heritage Management Plan is not required.

1.7.2 Flora and fauna assessment

Biosis Pty Ltd was commissioned to undertake a Flora and Fauna Assessment¹⁸ of the solar energy site at Yatpool. The results of the study have been taken into consideration in the design of the project.

1.7.3 Planning permit

Mildura Rural City Council has allowed for use and development of the land for a renewable energy facility through a planning permit¹⁹. The permit also allows for removal of native vegetation once credits have been procured to offset this removal.

1.8 Lease agreement and conditions

A lease has been secured between the applicant and the related party as mentioned in section 1.6. The conditions of this lease enable the applicant to make use of the land for Solar Plant Activities as defined in the contract while ensuring compliance with all relative environmental and statutory laws.

1.9 Incorporation details

Refer table 1, section 1.2.

¹¹ See attachment 7

¹² See attachment 8

¹³ See attachment 9

¹⁴ See attachment 10

¹⁵ See attachment 11

¹⁶ See attachment 28

¹⁷ See attachment 12

¹⁸ See attachment 13

¹⁹ See attachment 4

1.10 Details of any prosecutions or regulatory complaints against the Applicant

There have been no prosecutions or regulatory complaints commenced against the Applicant or any other company or person related to or associated with the Applicant. YSF is a 'fit and proper person' to hold a licence, and YSF's directors have not:

- Been declared bankrupt or had their affairs placed under administration
- Been disqualified from managing a company
- Been charged with fraud, theft, or any other criminal offence

1.11 Licence information

1.11.1 Type of licence sought

YSF is seeking a licence to generate electricity for supply or sale, and to sell electricity by wholesale under the Electricity Industry Act 2000. The substation was energised in November 2018. The Solar Farm is scheduled to begin generating electricity in July 2019, and so a licence will be required from this date.

1.11.2 Nature and scope of operations

Electricity will be generated by Yatpool Solar Farm and sold through the National Electricity Market at the spot price during the generation period.

No other unsuccessful licence has been sought in this or any other jurisdiction.

BayWa r.e. currently oversees the Karadoc Solar Farm in Victoria, and recently procured a licence to "generate electricity for supply or sale, and to sell electricity" in the NEM. The Karadoc Solar Farm was of a similar size to YSF in terms of power output, and Beon Energy Solutions Pty. Ltd. oversaw design and construction of the facility as will be the case with YSF.

The applicant is not seeking any non-standard licence conditions.

2 The Commission's objectives

The ongoing project at the Yatpool site will contribute to protecting the long-term interests of Victorian consumers as is a primary objective of the commission²⁰. Introducing a new renewable source of generation into the market will provide consumers with greater choice, meaning a lower price at equilibrium due to a shift in supply. Additionally, the lack of emissions resultant of the form of generation will attribute to a cleaner energy market with lower impact on the environment. The quality and reliability of these services is guaranteed by the many years of experience of the project team and the Applicant's mission of constantly setting new standards in the renewable industry.

YSF Pty Ltd is conducting the project in a manner which complies with the Commission's objectives outlined in section 8A of the ESC Act²¹.

²⁰ Refer http://www8.austlii.edu.au/cgi-bin/viewdoc/au/legis/vic/consol_act/esca2001327/s8.html

²¹ Refer http://www8.austlii.edu.au/cgi-bin/viewdoc/au/legis/vic/consol_act/esca2001327/s8a.html

2.1 Efficiency in the industry and incentives for long term investment

Through its introduction to the industry, YSF will contribute to competitive pricing and lower emissions. The technology's reliability is generally accepted, and the project's operational life expectancy is 25 years, creating a strong opportunity for long term investment.

2.2 Financial viability of the industry

The Applicant is backed by a structure of companies and is completely financed by its parent company BayWa r.e. The renewable industry is growing rapidly and will continue to expand with the desire to reduce emissions and generate cleaner energy. The National Electricity Market provides a platform for the competitive sale of electricity, where renewable energies are emerging as the strongest competitors for price with the greatest incentive to consumers.

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

YSF will contribute to competition in the industry, and by generating only a small portion of the demand for electricity in Victoria, YSF will not be able to monopolise the market. Market power will be taken from larger suppliers as YSF will be able to supply electricity at a competitive price.

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

YSF prioritises health and safety in the workplace through risk management and safe work methods. Assessments of the planning area were carried out in the initial stages of the project to determine potential environmental impacts relating to heritage sites, flora and fauna, traffic considerations, and fire management. These assessments were taken into consideration during the design stages of the project. Both the construction and the operation of YSF will comply with the HSE legislations of the electricity industry in Victoria.

2.5 The benefits and costs of regulation for consumers and regulated entities

The rates at which YSF will be able to sell electricity will be very competitive in the current market, since once the construction of the facility is complete, the only costs will be general upkeep, as the source of generation is free. This will benefit consumers as they will be supplied electricity at a lower rate and should result in less need for regulation by the NEM, forcing greater competition between regulated entities.

2.6 Consistency in regulation between States and on a national basis

The creation of new renewable energy generation sites will incentivise growth in the industry, leading to the production of more sites nationally. By setting an example through the creation of a reliable solar farm generating clean electricity, the industry will grow, and similar projects will be undertaken nationally. This will promote consistency in regulations between the States as the supply of cheaper electricity greatly increases.

3 Information on financial viability

The YSF project is fully financed by its parent company BayWa r.e., who had a turnover of €945.9 million in the 2016 financial year. BayWa r.e. is in turn financed by the umbrella company BayWa

AG, a 100-year-old German company that deals primarily in agriculture with a 2016 turnover of €15.4 billion. With the support of these large-scale businesses, any external factors affecting the time scale of the project or the capabilities of YSF can be effectively dealt with. This section will provide supporting data on the financial viability of the YSF project.

3.1 Financial data

A Consolidated Financial Statements report is provided in attachment 14 and includes a balance sheet, an independent auditor's report, and statements of assets and liabilities.

3.2 Significant Contracts

Significant contracts are provided in section 1.6

3.3 Business plan

The only interest of YSF Pty Ltd is to deal in the generation of electricity from the Yatpool Solar Farm, as it has no further plan to develop additional assets. A PPA has been agreed with Flow Power (see section 1.6) for 35% of all generated electricity, and all remaining electricity generated will be sold in the NEM at the spot price. As the parent company is trying to enter the Australian market and become competitive, it is in their strong interest to continue support for the YSF project post completion to manage the farm and maintain it for as long as possible. To this effect, BayWa r.e. plans to oversee O&M of the project and asset management activities for 10 years post commissioning of the farm.

3.4 Annual report

The annual report is provided in attachment 14.

3.5 Certificate of registration

The certificate of registration is provided in attachment 15.

3.6 Statements from parent company

A statement from the parent company BayWa R.E Renewable Energy GmbH is provided in attachment 16.

3.7 Guarantees in place

The YSF project is guaranteed by its parent company according to Figure 1, which is in turn guaranteed by the umbrella company BayWa AG. The support of these companies will enable YSF to deal with any external interference or discrepancies that negatively influence the project.

Additionally, the following insurance policies for the project are current:

- Construction Third Party Liability²²
- Contract Works Material Damage and Delay in Start Up Insurance²³
- Marine Transit and Delay in Start Up²⁴

²² See attachment 17

²³ See attachment 18

²⁴ See attachment 19

3.8 Australian Financial Services Licence

An Australian Financial Services Licence is not required as YSF Pty Ltd is not providing financial services to clients²⁵.

3.9 Discussions with licensed distributors

A PPA has been made with Flow Power for the purchase of 35% of the annual output of ISF as per attachment 8. Additional distributors are being contacted to secure a PPA for the purchase of the remaining output at a fixed price for a specified period.

4 Information on technical capacity

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

A chart showing the organisational structure including key personnel related to the project is provided in section 1.4, with supporting details of experience and knowledge of the industry provided in section 1.5.

4.2 Contracts with external service providers, including customer and supply contracts and outsourcing arrangements

All related contracts and agreements are outlined in section 1.6.

4.3 Statements from industry bodies

Since YSF Pty Ltd has not participated in the energy market in Victoria to date, there are no applicable statements from EWOV or any other industry body. Despite this, YSF are in the process of applying for generator registration²⁶ and have contacted AEMO and Powercor to secure a generator deed²⁷.

4.4 Internal controls, policies and procedures

As Energy Solutions Pty Ltd manages design and construction, they are responsible for providing a project specific Work Health and Safety Management Plan (WH&SMP) and for ensuring principles of Safety in Design are followed throughout all phases of the work. In accordance with this, they have provided the following policies and procedures:

- Traffic Management Plan²⁸
- Health, Safety and Environment Management Plan for Construction²⁹
- Project Procedures Manual³⁰

4.5 Business model

Refer to section 3.2.

²⁵ Refer <http://asic.gov.au/for-finance-professionals/afs-licensees/do-you-need-an-afs-licence/>

²⁶ See attachment 20

²⁷ See attachment 11

²⁸ See attachment 21

²⁹ See attachment 22

³⁰ See attachment 23

4.6 Risk management policies

Risk management is a major component of any project, and BayWa r.e., as the owner of YSF Pty Ltd, makes it a priority to understand and manage all potential risks prior to the commencement of a project. Australian standards were adhered to in the development of a risk management plan based on the legislation AS/NZS ISO 31000:2009 Risk management – Principles and guidelines. The Risk Management plan can be found in attachment 24. For relevant risk management policies provided by the EPC contractor, refer to section 4.4.

Additionally, Energy Solutions Pty Ltd as the holder of the EPC contract has the following accreditations and certifications:

- Safety Management – AS/NZ 4801:2001
- Environmental Management – AS/NZ ISO 14001 :2004
- Quality Management – AS/NZ ISO 9001:2008

4.7 Demonstrations of billing and management systems

As YSF is a generator and does not deal in the distribution of its output, YSF will have no billing or management systems with consumers.

4.8 Complaints register and procedures

Any complaints that arise are to be emailed to ysf.complaints@baywa-re.com, as is clearly posted on all site construction signs. All complaints are documented and dealt with within three business days from the time they are received, and all reasonable complaints are considered during construction.

4.9 Privacy statements

YSF keeps electronic backups of all related documents and includes privacy statements as required by statutory obligations.

4.10 Document retention policies

YSF Pty Ltd makes use of the online software Aconex for document management and sharing. By incorporating all related contractors into specific groups, documents can be posted and shared with the necessary recipients and cannot be removed. Each organisation on the network can control its own data and set rules around how that data is shared. In addition to Aconex, the online platform Box is used to store all documents related to the project and a backup of the directory is stored independently on most devices linked to the company's Box through Box Sync.

5 Information in support of a generation licence application

5.1 Details of experience in and knowledge of the electricity industry

YSF Pty Ltd.'s parent company BayWa r.e. has extensive experience in the renewable electricity industry through its international delivery of 142 projects with approximately 700MW of solar energy capability delivered. BayWa r.e. currently manages approximately 4500MW of solar and wind energy around the world and has the knowledge to bring their expertise to the Australian market in Victoria.

Currently BayWa r.e. manages O&M for a 20MW solar farm in Queensland and a 112MW solar farm in Victoria. Both solar farms are owned by BayWa r.e. and were designed and constructed by Beon Energy Solutions. An electricity licence was recently awarded for the generation and sale of electricity from the 112MW solar farm in Victoria, and BayWa r.e. are currently organising contractors to handle the various tasks required to maintain the facility post-completion.

5.2 Evidence of the capacity to comply with licence conditions

Through the experience and knowledge of the project's key personnel and parent company (refer section 1.5), YSF Pty Ltd will provide a sound product that complies with the conditions specified by the licence and will operate wholly within the bounds of the statutory obligations that accompany the licence. This is evidenced by the recent undertaking of the Hughenden and Karadoc Solar Farms in Queensland and Victoria that are currently being maintained by the parent company BayWa r.e.

5.3 Related entities

Energy Solutions Pty Ltd was chosen to perform all design and construction duties of the YSF project. Energy Solutions Pty Ltd operates under the name Beon and is an energy solutions business with a heritage in safety and reliability. Beon has been involved in more than \$3billion of Australian utility assets including transmission, distribution, and substations. BayWa r.e. and Beon have worked collaboratively on multiple projects, and the good relations between the two companies will assist in making the YSF project successful.

A consultancy agreement has been made with SMEC³¹ such that they will oversee the reliability of the engineering designs created by Energy Solutions Pty Ltd. SMEC is an engineering and infrastructure company that is certified to ISO 9001 who pride themselves on their ability to provide quality assurance. The consultancy of the design of the project will ensure the high standard to which YSF intends to maintain the asset.

5.4 Preliminary registration with NEMMCO

Preliminary discussion for registration as a generator in the NEM has not yet begun.

5.5 Confirmation that all planning and environmental approvals have been completed

All planning and environmental assessments have been completed and a planning approval has been supplied by the Mildura Rural City Council as per section 1.7.

5.6 Risk, governance and compliance management strategies

An overview of risk management policies is provided by the applicant in attachment 24 and an HSE management plan provided by the EPC contractor in attachment 22. As required by the EPC contract, the contractor will be responsible for HSE management on site, as well as managing construction and project procedures according to the manuals provided in attachments 21 and 23.

Compliance to Australian Standards for all works on site is ensured by the accreditations of the contractor as stated in section 4.6. Additionally, SMEC has been contracted as a consultant for all engineering designs proposed by the Principal Contractor to ensure the compliance to Australian

³¹ See attachment 25

Standards and their reliability. Revisions are made by the Principal Contractor based on feedback from the consultant and from the project team of the applicant.

A compliance register is included in attachment 26 outlining the obligations of the participant during the operations and maintenance phase of the project.

In addition, YSF is aware of its obligations as a 'Complex Electrical Installation' and as a 'High Voltage Installation' under the Electricity Safety Act and regulations and in particular s.301 and s.302 of the Electricity Safety (Installation) Regulations 2009. A fact sheet outlining the obligations considered by Energy Safe Victoria during an audit is provided in attachment 27.

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

The groundwork for future success in this venture has been laid out with a long term PPA contract as well as the necessary deeds required for the progression of the project. The ongoing management of 1200MW of solar generation by the parent company displays the capability of the entity to succeed. The success with the Karadoc project most recently gives insight into how well the YSF project will perform. With the strong knowledge and experience background of the key personnel participating in the project, in addition to the backing by such a strong parent company, there is good evidence that the proposed licence will be of ongoing benefit to the NEM and will pave the way for future projects of a similar scale across all jurisdictions.

5.8 Cross ownership

There are no cross-ownership issues arising under the provisions of Part 3 of the EI Act – cross ownership.

6 List of Attachments

All attachments are commercial-in-confidence and are not to be disclosed.

1. Multi-Crystalline Module data sheet
2. Medium Voltage Power Station data sheet
3. Tracking System installation manual
4. Mildura Rural City Council Planning Permit
5. Constitution of Yatpool Sun Farm
6. Experience of Key Personnel
7. EPC contract
8. PPA (Flow power)
9. Yatpool Sun Farm Land Lease
10. Access Road Works Agreement
11. Generator Deed
12. Heritage Statement
13. Flora and Fauna Assessment
14. Consolidated Financial Reports BayWa AG
15. Yatpool Sun Farm Pty Ltd ABN Registration
16. Letter of Funding Commitment BayWa A.G. (parent company)
17. Construction and Third-Party Liability Insurance
18. Contract works material damage and delay in start-up insurance policy
19. Marine transit and delay in start-up insurance policy
20. Generator Registration Application (rev1)
21. Traffic management plan (Beon)
22. HSE risk assessment (Beon)
23. PPM (Beon)
24. BayWa Risk Management Plan
25. Consultancy agreement with SMEC
26. Compliance register
27. Energy Safe Victoria - HV Complex Electrical Installation Auditing Fact Sheet
28. O&M Agreement with BayWa R.E. Solar Projects Pty Ltd
29. Statutory Declaration