



Electricity generation licence application form

Purpose of this form

This form must be completed by persons applying to the Essential Services Commission (the commission) for a licence to authorise electricity generation in Victoria. Electricity generation includes battery energy storage systems.

Basis for this form

Section 18 of the *Electricity Industry Act 2000* (the Industry Act) provides that a licence application must be made in a form approved by the commission. This is the form approved by the commission.

Use of this form and the applicant's responsibilities

A licence application may be made by any legal person including, without limitation, individuals, incorporated associations, unit and other forms of trusts and corporations. Entities that are not a legal person (for example, an unincorporated joint venture or a partnership) cannot apply for a licence.

For the purpose of this application form, reference to the term "Officer" includes the applicant's directors and secretary, and other persons who make or participate in making decisions that affect a substantial part of the business (for example, Chief Executive Officer, Chief Financial Officer or General Manager).

The applicant should list the information requested in the spaces provided in this form and enclose additional information when required.

The applicant must take all reasonable steps to ensure the information provided in the application form is complete, true and correct.

An officer of the applicant is required to make a declaration to this effect in the application form. Failure to disclose information or misrepresent any matter relevant to such information may result in a licence not being issued or in the revocation of a licence later.

It is a criminal offence under section 61A of the *Essential Services Commission Act 2001* to provide the commission with false or misleading information or documentation.

The applicant is responsible for providing the commission with current, accurate and relevant documentation. It is the applicant's responsibility to make all reasonable inquiries to obtain the information requested by this form.

Providing accurate and relevant information and a complete application (answering all questions and providing all information) will assist in timely processing of an application. All applications are assessed on a case-by-case basis. If insufficient information is provided with an application, we will contact the applicant about the requirement for additional information to be submitted before the application is considered further.

Prior reading

It is expected that the applicant has read our [Guideline: Applications for electricity and gas industry licences](#) before completing this form.

It is the applicant's responsibility to ensure its compliance with legal obligations when applying for a licence.

Licence conditions

Section 20 of the Industry Act authorises the commission to issue licences subject to conditions as decided by the commission. Licences are published on our [website](#). We recommend the applicant familiarise itself with the relevant standard conditions and be confident that it can comply with those conditions prior to applying for a licence.

Further information

The applicant should note that we may ask for further information, or to clarify the information that the applicant has already provided with the application.

Consultation and confidentiality

We will consult with relevant government, industry and consumer groups on the licence application through a public consultation process. Applications and/or supporting information that is not confidential will be made available on our website.

If the applicant believes that any information provided as part of its application is confidential or commercially sensitive, it is the applicant's responsibility to clearly identify this information on those documents. The applicant should also provide a 'non-confidential' version of the application form and documents for publication on our website.

How to lodge an application

The applicant may send the completed application form electronically (preferred) or in hard copy to:

Electronically: licences@esc.vic.gov.au

Hard copy: Market Operations, Energy Division
Essential Services Commission
Level 8, 570 Bourke Street
Melbourne VIC 3000

Large files

Applicants generally need to send us large files which is often not suitable via email. Please contact us at licences@esc.vic.gov.au to discuss alternative options to provide an application to the commission.

Application fees and annual licence fees

The commission has the authority to set a licence application fee. Currently, there is no application fee.

Holding a licence incurs annual licence fees. Refer to the commission's [Guideline: Applications for electricity and gas industry licences](#) for more information regarding annual licence fees.

1. General Information – The Applicant

The applicant must answer all questions in this section.

1.1 Legal name of applicant

State the full legal name of the applicant. The applicant is the person who will be generating electricity and/or selling electricity that will be the subject of the licence.

**Name: ESCO Solar Farm 7 Pty Ltd, as
trustee for the ESCO Solar Farm 7 Trust**

1.2 Legal identity of applicant

Provide the applicant's ABN and ACN (where relevant) and information about the applicant (for example, whether the applicant is a private limited company, trust, or joint venture).

ABN: ACN: 655 427 384

Type of entity: Limited Liability Company

1.3 Contact details and address of the applicant

The applicant	
Business address: Level 26, 2 Lonsdale Street, Melbourne	
State: Victoria	Postcode: 3000
Postal address (if different):	
State:	Postcode:
Full name of contact person:	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	

1.4 Diagram of corporate and organisational structure

Attach a diagram illustrating the corporate structure, including details of any related companies within the meaning of the *Corporations Act 2001* and the organisational chart. Provide a diagram of the:

a) corporate structure (including any parent and related companies within the meaning of the *Corporations Act 2001*), and

Attachment reference: Attachment to 1.4a - Corporate Structure Chart (including links to parent entities).docx

b) organisational chart (including composition of the board, management, and other key personnel responsible for the key functions)

Attachment reference: Attachment to 1.4b - SECV Org Chart Extract - Oct 2025.pptx

1.5 The licence

The applicant must answer all questions in this section.

If the applicant is seeking for a licence to be issued by a certain date, identify this date. **Note: we do not undertake to issue the licence by this date.** The applicant should usually allow a minimum of eight to 10 weeks **once we consider the application to be complete**. An application is considered complete once we have all the information needed for the commission to make a decision. In other words, when we have no need to request further information from the applicant. This includes a public consultation period of four weeks (generally) as part of our consideration of licence applications.

Provide details on the following:

Date from which licence is sought: 15 April 2026

Type of generation: Solar Farm and Battery Energy Storage System (BESS)

Expected name plate capacity: Solar Farm 119MW (from Apr 2026);
BESS 100MW/200MWh (from Jan 2027)

Location of generation facility: Horsham Renewable Energy Park (HREP)
425 Riverside East Road, Riverside 3401

Details of how the generator will be connected to the network:

The SEC is constructing a new Solar Farm and BESS (HREP) in Horsham, Victoria. HREP will connect to the existing AusNet Services Transmission Horsham Terminal Station (HOTS) by a new 220kV underground cable. The proposed maximum capacity of the facility is:

- When discharging: 119 MW.
- When charging: 100 MW.

2. Technical capacity

The applicant must answer all questions in this section.

2.1 Experience and knowledge of the industry

Provide information about the human resources available to the applicant. This includes:

- a) The experience and qualifications of those employees outlined in the organisational chart (see 1.4b);

Response: Resumes of senior managers with key electricity generation roles are included along with summary resumes for other relevant roles.

Attachment references:

Attachment to 2.1a - Resume SEC General Counsel and Company Secretary.pdf

Attachment to 2.1a - Resume SEC Chief Financial Officer.pdf

Attachment to 2.1a – Resume SEC Executive General Manager Energy Markets.pdf

Attachment to 2.1a - Resume SEC Executive General Manager Assets.pdf

Attachment to 2.1a - Resume Summaries SEC Leadership Team.docx

- b) If the applicant will employ contractors or agents to assist with the licensed activities, the name of those contractors or agents, details about the experience of the contractors or agents in such operations and details of the processes in place to ensure the contractors or agents comply with the licence conditions, including relevant regulatory obligations

Response: Not Applicable

Where the applicant is relying on a third party to provide staff and/or resources to meet the technical capacity requirements of the generation licence, provide:

- c) the experience and qualifications of any relevant key employees who will manage those systems and processes;
- d) if the applicant will engage third parties to assist with the licensed activities, provide the following information in relation to each third party:
 - (i) the name of that third party
 - (ii) the scope of activities undertaken by the third party
 - (iii) details and copies of any agreements for the provision of services
 - (iv) details about the experience of the third party in relation to the activities that it will be undertaking, including any accreditations
 - (v) details of the processes in place to ensure the third party complies with the licensee's regulatory obligations.

Attachment reference: Attachment to 2.1c-d - Third Party Service Providers.docx

2.2 Risk management

- a) Provide confirmation and evidence that the applicant has identified the risks associated with electricity generation operations. Additionally, provide evidence that the applicant has established, utilised and relied upon risk management systems and processes which are adequate, accurate and current to address those risks.
- b) Provide a copy of the applicant's risk management strategy. A statement should also be provided (or supporting document must make it clear) whether the strategy has been developed in line with any Australian or International Standard (for example, ISO 31000:2018).
- c) Provide a copy of a risk register that identifies risks, controls and mitigations.

Response:

SEC recognises effective risk management is essential to the company's strategy and achievement of its objectives.

Corporate Governance

SEC's governance framework is based on accountability, effective delegation, and adequate oversight to support sound decision-making.

The Board provides overall strategic guidance for SEC Victoria and its subsidiaries and effective oversight of management. The Board's roles and responsibilities are formalised in a Board Charter. SEC Victoria, SEC Infrastructure and SEC Energy each have a Board of Directors. The Charter sets out in general terms those functions that are delegated to management and those that are reserved for the Board. The Board Charter is enclosed as an attachment.

The Board has delegated to the Chief Executive Officer (CEO) the authority to manage the day-to-day operations of the business in relation to all matters other than those responsibilities reserved to itself. The CEO has, in turn, the authority to sub-delegate.

An Audit and Risk Committee has been established to assist the Board in executing its duties and the charter for that Committee is enclosed as an attachment.

Attachment references:

Attachment to 2.2 - Board Charter.pdf

Attachment to 2.2 - Audit and Risk Committee Charter.pdf

SEC's Risk Management Framework

SEC is committed to conducting its activities in accordance with applicable laws and regulations and maintaining a strong culture of risk management. SEC's Risk Management Framework supports this objective by embedding management systems, structures, policies, controls, and processes in the business and enabling a risk-aware culture across the people operating them.

SEC's Risk Management Policy defines our approach to risk management and oversight. The Risk Management Framework has been designed in accordance with the Australian Standard AS ISO

31000:2018 Risk Management – Guidelines, the Victorian Government Risk Management Framework (VGRMF) and the Standing Directions 2018 under the Financial Management Act 1994 (Vic). The Risk Management Framework is a combination of both formal and informal elements including the SEC Risk Policy, SEC Risk Appetite Statement, SEC Risk Management Procedures, and the Project Risk and Compliance Matrix which operate collectively to identify, assess, manage, and monitor risks in a proactive and effective manner.

Risks in SEC are profiled at the Strategic, Operational and Project level. Within each of these risk levels, risk categories are used to help identify key risk exposures to SEC relevant to each business area or supporting function. These categories are linked back to the board-approved SEC Risk Appetite Statement which articulates the amount of risk SEC is willing to accept in the pursuit of its objectives specifically across its different business domains.

Management is responsible for the design and implementation of an effective internal control system to manage SEC's risks. Management reports to the Board on how risks are being managed and the effectiveness of controls in place to mitigate those risks. An Enterprise Risk and Compliance Committee has been established which supports the Board Audit and Risk Committee to support the effectiveness of risk management and controls, as well as regulatory compliance and breach management activities. This committee's charter is enclosed as an attachment along with the core elements of SEC's Risk Management Framework.

Attachment references:

Attachment to 2.2 – SEC Enterprise Risk and Compliance Committee Charter 2025.pdf

Attachment to 2.2 – SEC Risk Policy 2025.pdf

Attachment to 2.2 – SEC Risk Management Procedures.pdf

Attachment to 2.2 – SEC Risk Appetite Statement 2025.pdf

Attachment to 2.2 – Project Pegasus Risk and Compliance Matrix.pdf

2.3 Registration with the Australian Energy Market Operator and generator performance standards

Advise if the applicant will apply to register with the Australian Energy Market Operator (AEMO). If so, provide evidence of registration or exemption, or intending registration or exemption (for example, correspondence between the applicant and AEMO). If the applicant is not registering with AEMO, describe why that is the case.

Provide confirmation from AEMO that proposed negotiated generator performance standards will meet requirements for power system security and reliability under the National Electricity Rules.

Response: SEC Victoria is the Ultimate Holding Company of SEC Infrastructure (owner of ESCO Solar Farm 7) and SEC Energy (see attachment to 1.4a). SEC Energy is responsible for energy market-facing activities for SEC and will be the registered market participant with AEMO for HREP.

SEC Energy submitted a generator registration application for HREP to AEMO on 13 Oct 2025 and this was acknowledged by AEMO (email attached).

The generator performance standards (GPS) was approved by AEMO as detailed in the attached 5.3.10 letter from AEMO on 18 Aug 2025. The GPS submitted as part of the AEMO registration is attached for your reference.

Attachment references:

Attachment to 2.3 - AEMO Acknowledgement SEC Generator Registration Application.msg

Attachment to 2.3 - Horsham_SF_and_BESS_5.3.10_Letter_18082025.pdf

Attachment to 2.3 – HREP GPS.pdf

2.4 Licences held in other jurisdictions

If the applicant holds, or has previously held, electricity and/or gas licences or authorisations in other jurisdictions provide details. If a licence or authorisation previously held has been suspended or cancelled, provide details.

Response: ESCO Solar Farm 7 (or related entities and associates) do not hold (and have not previously held) any retail electricity or gas licences or authorisations in other jurisdictions.

2.5 Previous unsuccessful licence applications in other jurisdictions

Confirm whether the applicant has applied for an electricity or gas licence in another jurisdiction and not been issued with a licence or authorisation, provide details.

Response: ESCO Solar Farm 7 has not applied for any electricity or gas licence or authorisations in other jurisdictions.

2.6 Licences held by associates of the applicant

If an associate (within the meaning of the *Corporations Act 2001*) holds an electricity or gas licence in Victoria or in other Australian jurisdiction, provide details.

Response: SEC Energy holds a Retail Electricity licence in Victoria. SEC Energy (or related entities and associates) do not hold (and have not previously held) any other electricity or gas licences or authorisations in Victoria or other jurisdictions.

2.7 Compliance management

- a) Provide evidence of compliance management which demonstrates how the compliance systems the applicant has (or will have) in place will ensure compliance with all the relevant regulatory obligations required by an electricity generation licence.
- b) Provide a copy of the applicant's compliance management strategy. A statement should also be provided (or supporting document must make it clear) whether the strategy has been

developed in line with any Australian or International Standard (for example, AS ISO 37301:2023).

Response: SEC is committed to complying with relevant laws, regulations, Government policies, industry codes and standards. SEC's values of uniting, nimble and fair, support our commitment to our compliance obligations and create a business where a strong compliance culture is at the core of everything we do. SEC recognises the current energy policy and compliance landscape is constantly evolving and rising community expectations hold us to higher standards of conduct and operational effectiveness.

To ensure we meet these expectations, SEC has established a Compliance Management Framework in accordance with the Australian Standard ISO 37301:2023 Compliance Management Systems. The SEC Compliance Management Framework includes the Compliance Policy, the Compliance Management Procedure, the Compliance Obligations Register and the Breach Management Procedure.

Attachment references:

Attachment to 2.7 - SEC Compliance Policy 2025.pdf

Attachment to 2.7 - SEC Compliance Management Procedure.pdf

Attachment to 2.7 - SEC Compliance obligations register - Chapters 2- 5 NER.xlsx

Attachment to 2.7 - SEC Compliance Breach Management Procedure.pdf

2.8 Material agreements

Provide copies of agreements entered into, or intended to be entered into, by the applicant that are material to the undertaking of the electricity generation activity. Agreements that are material to the undertaking of the electricity generation activity may include:

- a) Connection agreements, such as a Generator Connection Agreement and Generator Project Agreement with a generation facility.

Attachment reference:

Attachment to 2.8 - Horsham PCCD Executed (Redacted).pdf

- b) Any contract concerning the construction and delivery of the project (sometimes commonly referred to as a Project Construction and Coordination Deed (PCCD) or Engineering, Procurement and Construction Agreement).

Attachment reference:

Attachment to 2.8 - Horsham SF - EPCMA - Executed (Redacted).pdf

Attachment to 2.8 - BOP Deed of Amendment and Restatement_Executed (Redacted).pdf

Attachment to 2.8 - EPC - EXECUTION VERSION(40293910.1)_Redacted.pdf

- c) Any Network Services Agreements.

Attachment reference:

Attachment to 2.8 - Horsham UoSA Executed (Redacted).pdf

d) Any contracts concerning the managerial aspects of the activity (sometimes commonly referred to as a Management Services Agreement or Asset Management Agreement).

Attachment reference:

Attachment to 2.8 - Intercompany Services Deed (SECV to EnergyCo).pdf

e) Any contract concerning the ongoing operations and maintenance of the transmission assets (sometimes commonly referred to as an Operations and Maintenance Agreement).

Attachment reference:

Attachment to 2.8 - OM Contract - EXECUTION VERSION(40293909.1)_Redacted.pdf

Attachment to 2.8 - Solar OM Contract - Principal Draft - 27 October 2025(40303294.1)_Redacted.pdf

Attachment to 2.8 - Project Pegasus - Asset Management Agreement - (Compiled) (Executed 6 September 2024) (Redacted).pdf

f) Any contract concerning the sale of electricity from the generator under a Power Purchase Agreement.

Response: [REDACTED]

2.9 Engagement with Energy Safe Victoria

Provide details about the applicant's engagement with Energy Safe Victoria and any copies of correspondence regarding the proposed electricity generation facility.

Response:

PSD, the PV Contractor for HREP has had interaction with ESV on two occasions:

- On 25 June 2025, ESV representative (Mark Simms – Senior Renewable Engineer) visited the Site and have high level discussion with PSD on the work.
- PSD submitted a request for exemption, which was approved by ESV and is attached.

Attachment reference:

Attachment to 2.9 - ESV EE-1929 ElectricalWiringExemptionApproval.pdf

2.10 Additional information

Provide any additional information the applicant considers relevant to the commission's assessment of the applicant's technical capacity.

Response: Not applicable.

3. Financial viability

3.1 Financial resources

The applicant must provide a statement that will be made available to the public during the consultation period that the applicant has the financial resources to commence and sustainably perform the relevant licensable activities.

Provide a statement to confirm that:

- a) the applicant is financially viable and has the financial resources to sustainably operate the electricity generation facilities.

Response:

- SEC Victoria Pty Ltd is an Australian proprietary company, limited by shares, incorporated under the *Corporations Act 2001* (Cth) and declared a state-owned company under the *State-Owned Enterprises Act 1992* (Vic).
- SEC Victoria is the Ultimate Holding Company of SEC Infrastructure (owner of ESCO Solar Farm 7) and SEC Energy (who will be the registered participant with AEMO for HREP).
- ESCO Solar Farm 7, being a wholly-owned subsidiary of SEC Victoria, is financially viable and has the financial resources to sustainably operate the HREP generation assets.

- b) the applicant will be a registered market participant with the Australian Energy Market Operator for its electricity generation activities, therefore subject to the prudential requirements under the National Electricity Rules.

Response:

- SEC Energy is responsible for energy market-facing activities for SEC and will be the registered market participant with AEMO for HREP.
- SEC Energy is already a registered market participant with AEMO for its retail business and its 200MW BESS at the Melbourne Renewable Energy Hub.
- SEC Energy is in compliance with the combined retail and generation prudential requirements under the National Electricity Rules with AEMO.
- SEC Energy has applied to AEMO for registration of the HREP generation assets and the process for incorporating these assets into SEC Energy's prudential obligations with AEMO has already begun.

The commission reserves the right to conduct a financial viability assessment and require the applicant to produce information and documents it considers appropriate to complete such an assessment.

Attachment reference:

Attachment to 3.1 - SEC-Victoria-Annual-Report-2025.pdf

4. Fit and proper person

The applicant must answer all questions in this section.

In deciding whether to grant or refuse a licence application, the commission will consider whether the applicant is a fit and proper person to hold a licence in Victoria.

The concept of a 'fit and proper person' is established by common law and takes its meaning from its context, from the activities in which the person is or will be engaged, and the ends to be served by those activities.

In considering whether an applicant is a fit and proper person, we will have regard to the applicant's honesty, integrity and reputation. These are relevant factors as they can inform an assessment of the likelihood of future conduct.

We will also consider the conduct of directors, office holders or any person with significant managerial duties or influence. We will also consider the conduct of related bodies corporate or entities that can exert control over the applicant.

Response: SEC has completed a comprehensive assessment of its directors and persons with significant managerial responsibility over ESCO Solar Farm 7 and SEC Energy. This assessment is consistent with that accepted by the Commission on 4 Dec 2024 in support of SEC's Energy Retail Licence application. The only change in the past twelve months has been the addition to the SEC's Board of two new directors whose responses to all the below questions are "No". SEC's response to each of item a) to e) below is, therefore, "No", with the exception of [REDACTED] for items d) and e), as advised previously. SEC's assessment is attached.

Attachment reference:

Attachment to 4 – Fit and Proper Persons Assessment.pdf

- a) Have any directors of the applicant, directors of any entity that can exert control over the applicant, or any person with significant managerial responsibility or influence on the applicant:
 - (i) been declared bankrupt,
 - (ii) had their affairs placed under administration,
 - (iii) been disqualified from managing a company,
 - (iv) been subject to debt judgements, or
- b) insolvency proceedings (including any administration, liquidation or receivership in connection with the affairs of a company)?

If yes, provide details:
- c) Has the applicant, any directors of the applicant, directors of any entity that can exert control over the applicant or any person with significant managerial responsibility or influence on the applicant been prosecuted for any offences or had any enforcement action taken under any

state, territory, Commonwealth or foreign legislation (including, but not limited to, the *Competition and Consumer Act 2010*, *Corporations Act 2001*, or the *Australian Securities and Investments Commission Act 2001*)?

If yes, provide details:

d) Has the applicant, any directors of the applicant, any related body corporate, or any person with significant managerial responsibility or influence on the applicant been involved in any material breaches of obligations regulated by the commission or any other regulator?

If yes, provide details:

e) Has the applicant, any directors of the applicant, any related body corporate, or any person with significant managerial responsibility been under investigation in relation to its regulatory obligations or is currently bound by an enforceable undertaking?

If yes, provide details:

f) Has the applicant, any related body corporate or any person with significant managerial responsibility or influence on the applicant, been refused a licence or authorisation, or had restricted, suspended or revoked any such licence or authorisation (in any jurisdiction)?

If yes, provide details:

g) Provide any other information the applicant considers relevant to the commission's fit and proper person assessment.

Response: Not applicable

Additional information

Answer the following questions and, where the answer to any question is "no" (except for question b)), provide further detail.

a) Is the applicant a resident of, or does it have permanent establishment in, Australia?

Response: SEC is a resident of Victoria, Australia.

b) Is the applicant under external administration (as defined in the *Corporations Act 2001*) or under a similar form of administration under any laws applicable to it in any jurisdiction?

Response: No

c) Is the applicant immune from suit in respect of the obligations under the *Electricity Industry Act 2000*?

Response: No, the applicant does not believe it would be immune from suit under the Electricity Industry Act 2000, other than in accordance with Part 6 of the Act.

d) Is the applicant capable of being sued in its own name in a court of Australia?

Response: Yes

5. Commission objectives

The applicant must answer all questions in this section.

In deciding whether to grant or refuse an electricity generation licence application, the commission must consider its objectives under the *Electricity Industry Act 2000* and the *Essential Services Commission Act 2001* (ESC Act).

Our primary objective under the ESC Act, when performing our functions and exercising our powers, is to promote the long-term interests of Victorian consumers. In seeking to achieve this objective, we must have regard to the price, quality, and reliability of essential services and the matters set out in section 8A to the extent they are relevant.

In seeking to achieve the objectives specified in section 8, the commission must have regard to the matters to the extent that they are relevant in any particular case.

Provide any information the applicant considers relevant to the commission's consideration of its objectives outlined in:

- Section 8 of the ESC Act (also see section 8A of the ESC Act); and
- Section 10 of the *Electricity Industry Act 2000*.

Response:

SEC recognises the important role of the commission, and SEC's purpose and vision align with many of the commission's objectives. SEC has set a vision to accelerate Victoria's transition to an affordable, reliable, equitable and zero-emissions electricity system that enables decarbonisation across the economy, in partnership with Traditional Owners, the private sector and in coordination with government initiatives.

Price, quality and reliability of essential services

Our purpose is to work together for renewable, affordable, reliable energy for all Victorians, and we have a clear strategy to achieve it. This includes investing in renewable energy generation and storage; supporting households to go all-electric; and helping build the renewables workforce needed to drive the transition. SEC supports the objectives to support competitive pricing and provide quality and reliability of electricity by:

- Investing an initial \$1 billion towards delivering 4.5 GW of new renewable energy and storage projects. By ensuring new renewable energy and storage capacity will be available as coal generators transition out, this will allow Victoria to maintain reliability and affordability for consumers.
- Developing options for future investment in long duration storage assets and offer capacity products in the market. This reduces retailers' and C&I customers' exposure to high, volatile prices through the offering of capacity products.

- Combining existing renewable projects with new storage assets and offer 100% renewable electricity products. This supports customers, including government, to achieve their renewable energy and decarbonisation goals.
- Serving C&I customers with firmed electricity supply agreements, helping them achieve their goals, which enables small C&I customers who are currently unable to access power purchase agreements to meet their cost and decarbonisation goals.

Collectively, these actions promote the long-term interests of Victorian energy consumers.

Promote the development of full retail competition.

SEC is investing in renewable and storage generation which will improve the liquidity in the market for both energy and capacity products. This will have a direct impact on full retail competition by addressing a current market challenge for small to medium sized C&I customers who are unable to directly access renewable electricity (e.g., power purchase agreements (PPAs)) and bespoke firming agreements to meet their complex energy needs due to their smaller scale. This could deliver on cost and decarbonisation goals (vs. large industrials who have the influence to compel wholesalers to create bespoke products for them).

In the longer term, SEC plans to increase the benefits provided to C&I customers by supporting behind the meter assets and Renewable Industrial Hubs. This could include servicing multiple customers through these hubs to deliver low-cost energy to customers and reducing their consumption while significantly lowering network demand.

Promote protections for customers, including in relation to assisting customers who are facing payment difficulties.

While SEC will not retail electricity to small customers, SEC fully supports protections for all customers, including those facing payment difficulties. Over the medium term, SEC will educate and engage industry and households on the options and benefits of home electrification, including how they can access trusted resources to support their energy decisions and lower their energy costs by switching from gas to all-electric.

Promote a consistent regulatory approach between the electricity industry and the gas industry.

Although SEC is only participating in the electricity market, SEC fully supports a consistent approach between the gas and electricity industry.

6. Statutory declaration

All the information provided in this application and attached documents for an electricity generation licence must be true and correct and must be verified by a statutory declaration. This statutory declaration must be made by the applicant (where the applicant is an individual) or a director of the applicant (where the applicant is a corporation) and must be made in accordance with the requirements of the *Oaths and Affirmations Act 2018*.

An example statutory declaration form can be found [here](#). Information for authorised witnesses can be found [here](#).

The statutory declaration must address the following:

- a) identification of the declarant's position and/or role with the applicant
- b) that the declarant believes the information provided in the application to be true and correct
- c) that the declarant believes the applicant has the financial resources to commence and operate the activities the subject of the licence.

I, [REDACTED]

make the following statutory declaration under the *Oaths and Affirmations Act 2018* (Victoria):

- a) That I am a Director of ESCO Solar Farm 7 Pty Ltd
- b) The information provided in this application (including any attachments) to the Essential Services Commission for an electricity generation licence is true and correct
- c) That ESCO Solar Farm 7 Pty Ltd has the financial resources to commence and operate the Solar Farm and BESS (HREP)

and I make this declaration conscientiously believing these matters to be true and knowing that making a statutory declaration that I know to be untrue is an offence.

I make it knowing that making a statutory declaration that I know to be untrue is an offence.

Date:

Signature:

(signature of person making this statutory declaration in the presence of the authorised statutory declaration witness)

Declared at: on

Witness

I am an authorised statutory declaration witness and I sign this document in the presence of the person making the declaration:

.....
[signature of authorised statutory declaration witness]

on

[REDACTED]
[REDACTED]
[REDACTED]

A person authorised under section 30(2) of the ***Oaths and Affirmations Act 2018*** to witness the signing of a statutory declaration.

Attachment Confidentiality

ESCO Solar Farm 7 refers to attachments throughout this application. The below list sets out the confidentiality status for each of these attachments.

Document Name	Confidential
Attachment to 1.4a - Corporate Structure Chart (including links to parent entities).docx	Yes
Attachment to 1.4b - SECV Org Chart Extract - Oct 2025.pptx	Yes
Attachment to 2.1a - Resume SEC Chief Financial Officer.pdf	Yes
Attachment to 2.1a - Resume SEC Executive General Manager Assets.pdf	Yes
Attachment to 2.1a – Resume SEC Executive General Manager Energy Markets.pdf	Yes
Attachment to 2.1a - Resume SEC General Counsel and Company Secretary.pdf	Yes
Attachment to 2.1a - Resume Summaries SEC Leadership Team.docx	Yes
Attachment to 2.1c-d - Third Party Service Providers.docx	Yes
Attachment to 2.2 - Audit and Risk Committee Charter.pdf	Yes
Attachment to 2.2 - Board Charter.pdf	Yes
Attachment to 2.2 – Project Pegasus Risk and Compliance Matrix.docx	Yes
Attachment to 2.2 - SEC Enterprise Risk and Compliance Committee Charter 2025.pdf	Yes
Attachment to 2.2 – SEC Risk Appetite Statement 2025.pdf	Yes

Attachment to 2.2 – SEC Risk Management Procedures.pdf	Yes
Attachment to 2.2 - SEC Risk Policy 2025.pdf	Yes
Attachment to 2.3 - AEMO Acknowledgement SEC Generator Registration Application.msg	Yes
Attachment to 2.3 - Horsham_SF_and_BESS_5.3.10_Letter_18082025.pdf	Yes
Attachment to 2.3 - HREP GPS.pdf	Yes
Attachment to 2.7 - SEC Compliance Breach Management Procedure.pdf	Yes
Attachment to 2.7 - SEC Compliance Management Procedure.pdf	Yes
Attachment to 2.7 - SEC Compliance obligations register - Chapters 2- 5 NER.xlsx	Yes
Attachment to 2.7 - SEC Compliance Policy 2025.pdf	Yes
Attachment to 2.8 - Horsham PCCD Executed (Redacted).pdf	Yes
Attachment to 2.8 - Horsham SF - EPCMA - Executed (Redacted).pdf	Yes
Attachment to 2.8 - BOP Deed of Amendment and Restatement_Executed (Redacted).pdf	Yes
Attachment to 2.8 - EPC - EXECUTION VERSION(40293910.1)_Redacted.pdf	Yes
Attachment to 2.8 - Horsham UoSA Executed (Redacted).pdf	Yes
Attachment to 2.8 - Intercompany Services Deed (SECV to EnergyCo).pdf	Yes

Attachment to 2.8 - OM Contract - EXECUTION VERSION(40293909.1)_Redacted.pdf	Yes
Attachment to 2.8 - Solar OM Contract - Principal Draft - 27 October 2025(40303294.1)_Redacted.pdf	Yes
Attachment to 2.8 - Project Pegasus - Asset Management Agreement - (Compiled) (Executed 6 September 2024) (Redacted).pdf	Yes
Attachment to 2.9 - ESV EE-1929 ElectricalWiringExemptionApproval.pdf	Yes
Attachment to 3.1 - SEC-Victoria-Annual-Report-2025.pdf	No
Attachment to 4 – Fit and Proper Persons Assessment.pdf	Yes