

Mortlake South Wind Farm Generation Licence Application to Essential Service Commission, Victoria





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Mortlake South Wind Farm

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1 The Applicant and the Nature of the Application

1.1 Introduction

Mortlake South Wind Farm Pty Ltd ABN 126 2227 1363 (**MSWF**) is constructing the Mortlake South Wind Farm near the town of Mortlake in the south west region of Victoria (**Mortlake South Wind Farm**). The Mortlake South Wind Farm will be solely owned by MSWF, a wholly owned subsidiary of ACCIONA Energia Global S.L., a company incorporated in Spain (**AEG SL**).

The Mortlake South Wind Farm comprises of:

- thirty-five (35) wind turbine generators (**WTG**) with an aggregate nameplate capacity of 157.5 megawatts (**MW**);
- a 3.75MW battery energy storage system (**BESS**) (on hold and pending further assessment with AEMO and may be subject to an AEMC proposed rule change for energy storage);
- a 220/33kV internal substation;
- an underground medium voltage (33kV) reticulation system connecting the WTGs to the internal substation; and
- a 220kV underground line connecting the internal substation to Terang Terminal Station (**TGTS**).

MSWF anticipates that generation of electricity will commence in the first quarter of 2022. Accordingly, pursuant to Section 18 of the *Electricity Industry Act 2000* (Vic) (the Act), MSWF (**Applicant**) hereby applies to the Essential Services Commission (**ESC**):

- (a) for a licence to generate electricity for supply and sale into the National Electricity Market (**NEM**); and
- (b) for that licence to also permit MSWF to:
 - (i) charge, store and discharge electricity from the wind farm from the BESS; and
 - (ii) own, operate and maintain the 220kV underground interconnection line between the internal substation and TGTS.

MSWF requests that the generation licence is issued on or around 28 February 2022.

It is noted that:

- MSWF does not currently hold any generator licences in the state of Victoria,
- this is the first generator licence sought by MSWF,
- no non-standard licence conditions are sought by MSWF,
- within Australia, other associated ACCIONA Group companies hold the necessary generation licences to operate the following wind farms:
 - Mt Gellibrand Wind Farm Pty Ltd holds a generation licence to operate Mt Gellibrand Wind Farm in Victoria;

- Pyrenees Wind Energy Developments Pty Ltd holds a generation licence to operate Waubra Wind Farm in Victoria;
- Gunning Wind Energy Development Pty Ltd operates Gunning Wind Farm in New South Wales; and
- Cathedral Rocks Wind Farm Pty Ltd (a Joint Venture) holds a generation licence to operate Cathedral Rocks Wind Farm in South Australia.

1.2 Applicant Details

MSWF is the licence applicant.

MSWF is a wholly owned subsidiary of AEG SL and part of the ACCIONA Group.

The ACCIONA Group operates worldwide and is active in three key sectors including energy, water and infrastructure. In terms of its energy operations, ACCIONA is one of the world's most experienced Renewable Energy Independent Power Producers. The company is active in five commercialised renewable energy technologies including wind, solar PV, solar thermal, hydro and biomass. ACCIONA owns and operates a mixed portfolio of over 11GW of renewable energy assets in more than 16 countries, with further projects currently under construction.

In Australia, ACCIONA has built and owns four wind farms in Australia (one through a joint venture) and has developed a strong pipeline of projects for construction. ACCIONA's operational wind farms at Mt Gellibrand and Waubra in Victoria, Gunning in New South Wales and Cathedral Rocks (jointly owned with Energy Australia) in South Australia have a generation capacity of over 430 MW of renewable energy.

Further financial and other company information can be found at www.accionacom.

1.3 Registered Office

Mortlake South Wind Farm Pty Ltd
Level 38
360 Elizabeth Street
Melbourne VIC 3000

1.4 Address for Correspondence in relation to this Application

Mortlake South Wind Farm Pty Ltd
Level 38
360 Elizabeth Street
Melbourne VIC 3000
Attention: Mr Graeme Cook
Email: graeme.cook@accionacom

1.5 Corporate and Organisational Structure

Details of the ACCIONA Group corporate structure are included at [Attachment 1](#).

ACCIONA's Australian team organisational structure (including technical personnel) is shown in [Attachment 2](#).

1.6 Key Personnel

Information on key personnel are included in [Attachment 3](#)

1.7 Details of Contracts

The following outsourced services contracts to facilitate the construction and operation of Mortlake South Wind Farm have been entered into by MSWF or are currently under negotiation by MSWF:

1.7.1 Construction Contracts

MSWF has entered into an engineering, procurement and construction contract for the Mortlake South Wind Farm with Acciona Energy Oceania Construction Pty Ltd (**AEOC**) (the **EPC Contract**), a related entity of MSWF. Under the EPC Contract, AEOC are responsible for the construction and commissioning of the Mortlake South Wind Farm. A copy of the executed EPC Contract is included as [Attachment 4a](#).

AEOC has entered into a Turbine Supply Agreement with Nordex Oceania Pty Ltd (**NOPL**) (**TSA**). Under the TSA, NOPL is responsible for the design, transport, installation and commissioning of the WTG. A copy of the TSA is included as [Attachment 4b](#).

1.7.2 Operations and Maintenance Services Contracts

MSWF will enter into a number of operation and maintenance service contracts for Mortlake South Wind Farm, details of which are included as Attachment 4c.

1.7.3 Connection Contracts

MSWF has entered into a number of connection related contracts for Mortlake South Wind Farm, details of which are included as Attachment 4d, Attachment 15 and Attachment 16. MSWF is pending the execution of the Use of System Agreement with AEMO.

1.7.4 Offtake / Power Purchase Agreements:

Various offtake / contract for difference contracts will support MSWF.

MSWF was successful in the VRET 2017 Reverse Auction and subsequently entered into a contract with the Victorian Government in August 2018 (the **VRET Support Agreement**). The VRET Support Agreement provides support from the Victorian Government for energy generated at Mortlake South Wind Farm. The VRET Support Agreement is included at [Attachment 4e](#).

The electricity generated at Mortlake South Wind Farm will be sold to the National Electricity Market.

1.8 Incorporation Details

Copies of the Certificate of Registration of a Company and the current Constitution of MSWF are attached at [Attachment 5a](#) and [Attachment 5b](#).

1.9 Special Purpose Vehicle

MSWF is a wholly owned subsidiary of AEG SL.

There are no joint venture agreements or shareholder agreements that relate to MSWF.

MSWF is not a trust entity or a company formed as a partnership.

1.10 Shareholders

Mortlake South Wind Farm Pty Ltd is not a publicly listed company. The chain of ownership of MSWF is shown in Section 1.5.

The immediate 100% shareholder of MSWF is Mortlake South Wind Farm Holdings Pty Ltd (ACN 622 269 505) (**MSWF Holdings**).

The address of MSWF Holdings is:

Level 38
360 Elizabeth Street
Melbourne VIC 3000

1.11 Prosecutions and Regulatory Complaints

As ACCIONA Group is an international conglomerate originating in Spain under the control of ACCIONA SA, MSWF's ultimate parent company, the scope of all companies and persons related or associated with MSWF is extremely diverse, multinational and extends considerably beyond the energy industry. For the purposes of keeping the level of disclosure relevant to the ESC and this generation licence application, MSWF has restricted the scope of its disclosure to only those ACCIONA Group companies on the energy side of the business and incorporated in Australia as demonstrated in the ACCIONA Group corporate structure as set out in [Attachment 1](#).

There are no prosecutions and regulatory complaints lodged.

1.12 Details of the Proposed Power Station

1.12.1 Location

The Mortlake South Wind Farm is located approximately 5 kilometres south of Mortlake in the Moyne Shire, in South-West Victoria.

The land on which the wind farm is located consists of separate landowners with lease agreements, permanent maintenance facility lease, and option for lease (for other facilities leases). The land is primarily used for livestock grazing and cropping. The total extent of the wind farm is dispersed over an area of 60 square kilometres that will continue to be used for grazing and cropping during the operation of the wind farm.

The 220kV underground interconnection line between the Mortlake South Wind Farm internal substation and TGTS runs down Tapps Lane, along the former Terang-Mortlake Rail Corridor and through a combination of road reserves and private land to TGTS.

1.12.2 Nameplate Rating and Power Station Components

The Mortlake South Wind Farm comprises of:

- thirty five (35) WTGs, each rated at 4.5MW, with a combined rated generating capacity of 157.5MW;
- a 3.75MW BESS to charge and discharge energy, to be installed at the time of construction and expected to be operational within 12 months after commissioning of the WTGs (on hold and pending assessment with AEMO);
- a 220/33kV internal substation;
- an underground medium voltage (33kV) reticulation system connecting the WTGs to the internal substation; and
- the 220 kV underground line connecting the internal substation to TGTS.

1.12.3 Substation and Network Connection

Each WTG includes a generator in its nacelle and an internal transformer to step the voltage of the electricity generated up to 33kV. The internal electrical reticulation system will be 33kV and will all be underground. All wind turbines will connect to one main internal substation on the project site where a transformer will step up the voltage to 220kV.

TGTS is a 66kV/220kV sub-station that connects the 220kV transmission system to the 66kV distribution system which services customers in the south-west of Victoria. MSWF will connect its internal substation to the 220kV bus at TGTS via 15km of new underground power lines. The 220kV underground power lines will be owned, operated and controlled by MSWF as part of, and only for the benefit of, the Mortlake South Wind Farm (i.e. as part of the generating system, and not as part of the shared transmission network). Accordingly, MSWF seeks for the generation licence, the subject of this application, to permit MSWF to own, operate and maintain this 220kV interconnection line between the internal substation and TGTS. [Attachment 17A](#) and [Attachment 17B](#) provide supporting information.

1.12.4 Operation

A permanent operations facility, manned during normal working hours, will be constructed on site at Mortlake South Find Farm during the construction of the facility. Mortlake South Wind Farm will normally be controlled from this permanent operations facility. Out of hours control will be through callout of rostered staff who will live locally to the facility. Operation of individual turbines will be possible locally at each turbine or from the operations facility. The power plant will also be monitored from a centralised control centre in Spain, with after-hours response available from this centralised control centre.

1.13 ACCIONA Experience in the Electricity Industry

ACCIONA has constructed and operates the following renewable energy assets in Australia:

- Mt Gellibrand Wind Farm in Victoria – 132MW (completed 2018);
- Waubra Wind Farm in Victoria – 192MW (completed 2009);

- Gunning Wind Farm in New South Wales – 46.5MW (completed 2011);

ACCIONA, through a joint venture with Energy Australia, also owns a 50% interest in the Cathedral Rocks Wind Farm in South Australia – 66MW (completed 2005). ACCIONA operates the farm on behalf of the joint venture.

ACCIONA also constructed the Royalla Solar Farm in the ACT – 20MW (completed 2015).

1.14 Fit and Proper Person

1. **Question:** Have any directors of MSWF or of any Australian entity that can exert control over MSWF:

- (a) been declared bankrupt
- (b) had their affairs placed under administration
- (c) been disqualified from managing a company

Answer: No.

2. **Question:** Have any directors of MSWF, directors of any Australian entity that can exert control over MSWF or any person with significant managerial responsibility or influence on MSWF been subject to:

- (a) any debt judgments, or
- (b) insolvency proceedings (including any administration, liquidation or receivership in connection with the affairs of a company)?

Answer: No.

3. **Question:** Have any directors of MSWF, directors of any Australian entity that can exert control over MSWF or any person with significant managerial responsibility or influence on MSWF been charged with fraud, theft or any other criminal offence?

Answer: No.

4. **Question:** Has MSWF, any directors of MSWF, any Australian 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 Essential Services Commission?

Answer: No.

5. **Question:** Has MSWF, any directors of MSWF, directors of any Australian entity that can exert control over MSWF or any person with significant managerial responsibility or influence on MSWF been prosecuted for any offences or had any enforcement action taken under any state, territory, Commonwealth or foreign legislation (including, but limited to, the Competition and Consumer Act 2010 (Cth), Corporations Act 2001 (Cth), or the Australian Securities and Investments Commission Act 2001 (Cth))?

Answer: No.

6. Question: Has MSWF, any Australian related body corporate or any person with significant managerial responsibility or influence on MSWF, been refused a generation licence or generation authorisation, or had restricted, suspended or revoked any such licence or authorisation?

Answer: No.

Note, the Acciona Group comprises of approximately 600 companies and operates in many countries throughout the world. Multiple Acciona business divisions (including Energy and Infrastructure and other divisions) are also present in many countries. The above statements have been provided in relation to ACCIONA's energy operations in Australia.

2 Essential Services Commission Objectives

The granting of a generation licence to MSWF would be consistent with the objectives of the ESC under subsections 8(1), 8(2) and 8A of the *Essential Services Commission Act 2001* (Vic) for the reasons outlined below.

[8(1)] To promote the long term interests of Victorian consumers with [8(2)] regard to the price, quality and reliability of essential services.

The applicant believes that the granting of the licence to MSWF is consistent with this objective. MSWF is a financially viable renewable energy generator supported by long term contracts, owned and operated by an experienced global leader in renewable energy industry.

The project is expected to increase the level of renewable energy competitiveness in the National Electricity Market (**NEM**). This is expected to assist in economically addressing any supply/demand imbalance in the Renewable Energy Certificate (**REC**) market resulting from the requirement on electricity retailers to obtain RECs.

In accordance with the National Electricity Rules (**NER**), the project will comply with the Australian Energy Markets Operator (**AEMO**) and AusNet's Generator Performance Standard (**GPS**). This is required to ensure quality and reliability is not compromised. The generator will be obliged to comply with the NER throughout its operational life.

[8A(1)(a)] To facilitate efficiency in the industry and incentives for long-term investment

The project is an example of an efficient, market driven response. The proposal to develop Mortlake South Wind Farm is a response to an identified opportunity to invest in a project to meet the environmental need expressed in the Renewable Energy (Jobs and Investment) Act 2017. The project is a long term investment for ACCIONA with an expected project life of at least 25 years.

[8A(1)(b)] To facilitate the financial viability of the industry

The degree of competition in the NEM is an indicator of its financial viability. The Applicant is of sound financial strength and has evolved from substantial due diligence sufficient to achieve backing from ACCIONA SA.

[8A(1)(c)] To consider the degree of, and scope for, competition within the industry, including countervailing market power and information asymmetries.

The project increases market competition in the supply of electricity generation. MSWF will not be in a position of holding significant market power following this project. Due to the variable nature of the fuel source, generators are not in a position to "game" the market; they generate when they are able and will be a price taker.

[8A(1)(d)] To consider the relevant health, safety, environmental and social legislation applying to the regulated industry.

ACCIONA has a strong commitment to being a good corporate citizen and to environmental and occupational health and safety. ACCIONA has appropriate policies and procedures in place to achieve this and strives for continual improvement in these areas.

Development of wind farms improves the energy industry environmental and social performance by reducing air pollution associated thermal generation and providing additional employment in predominantly rural areas. The Federal and Victorian Governments are committed to the reduction of Australia's greenhouse emissions. As the power generation sector accounts for approximately one third of emissions, increasing use of low emission generation technology is an important component of greenhouse gas abatement efforts.

[8A(1)(e)] To consider 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) and (ii) regulated entities.

The proposal represents an efficient form of investment in response to consumer energy demand and government policy. It increases competition in the generation sector and LGC market facilitating efficient market outcomes and price efficiency.

[8A(1)(f)] To consider consistency in regulation between States and on a national basis.

Electricity generated at Mortlake South Wind Farm in Victoria will be sold to the wholesale spot market of the National Electricity Market, under the regulation and supervision of AEMO.

Large Scale Generation Certificates will be created by MSWF under the Renewable Energy (Electricity) Act 2000.

The granting of the licence is consistent with this objective.

[8A(1)(g)] To consider any matters specified in the empowering instrument.

The empowering instrument is Section 10 of the Electricity Industry Act 2000, which is consistent with objectives of the Essential Service Commission; construction of new generator(s) will increase supply of electricity to the market, to be purchased by retailers or direct market customers. This will facilitate more liquidity in the market and will support retail competition.

3 Financial viability

MSWF is a financially viable entity with the resources to sustainably operate and maintain Mortlake South Wind Farm and generate electricity for supply and sale into the NEM under this licence.

MSWF is a wholly owned subsidiary of ACCIONA ENERGIA GLOBAL S.L. and part of the ACCIONA Group. The financial resources of the Applicant are intended to be provided by ACCIONA FINANCIACION FILIALES AUSTRALIA PTY LTD.

ACCIONA is one of the largest renewable energy developers in the world, having developed in excess of 11.0 GW of renewable energy generation. In 2020, across all business divisions, the ACCIONA Group generated €6.50 billion in revenue and EBITDA of €1.12 billion. ACCIONA SA employs 38,355 people worldwide.

Public financial documents are included at [Attachment 6a](#). ACCIONA's internal Financial Model for Mortlake South Wind Farm is included as [Attachment 6b](#) with associated commentary included as [Attachment 6c](#).

4 Technical capacity

4.1 Introduction

ACCIONA has over 20 years' experience in the energy sector, particularly focused on wind generation. ACCIONA operates more than 11,000 MW of own capacity worldwide. This includes more than 8,745 MW of wind generation, and more than 1,444 MW of solar PV generation with plants located in Spain, France, Germany, Italy, Greece, Ireland, Canada, USA, Australia, South Africa and South America. Within Australia, ACCIONA has constructed, owns and operates wind assets as outlined in Section 1.13.

As one of the world's largest wind generation developers with in excess of 1,500 employees in this sector, ACCIONA has extensive capability in all aspects of wind farm development, construction and operation. MSWF enjoys the full support of its parent company as well as maintaining technical competence locally.

Management and personnel have experience in market operations and associated NER compliance through ACCIONA's existing operational facilities at Mt Gellibrand Wind Farm, Waubra Wind Farm, Gunning Wind Farm and Cathedral Rocks Wind Farm. Members of the team have prior relevant experience in the electricity sector. Accordingly, MSWF has the capability to meet the requirements of a generation licence.

4.2 Organisational Chart and Experience of Personnel

Please refer to section 1.5 and 1.6

4.3 Contracts with External Service Providers

Please refer to section 1.7

4.4 Internal Controls, Policies and Procedures

ACCIONA has corporate policies, procedures and internal controls that apply across the organisation and are reflective of best practice.

For this application, relevant policies include:

- Human Resource Policies and Procedures;
- Financial Approval Policies and Procedures;
- Contracting Procedure;
- Safety in Design Procedures;
- Working at Heights Procedure;
- Contractor HSE Requirements Procedure;
- Emergency Management Procedure;
- Risk Management Procedure (see Section 4.5).

Specific to Mortlake South Wind Farm, ACCIONA has developed a project Health & Safety Plan, Environmental Management Plan and Quality Plan. Additionally, a Mortlake South Wind Farm specific Asset Maintenance Plan will be developed prior to the commencement of operations at the site.

4.5 Risk Management Policies and Registers

4.5.1 Health Safety and Environment Risk Management Procedure

ACCIONA's Health Safety and Environment Risk Management Procedure is attached at [Attachment 7a](#). This procedure outlines the HSE risk management processes that ensure effective and robust management of HSE risks within the business.

4.5.2 Risk Register

A preliminary Mortlake South Wind Farm Risk Register was compiled during the Development Phase of the project and is regularly reviewed and updated during each phase of the project. Ongoing risk register reviews and validation of effectiveness of controls are key aspects of the Risk Management process at ACCIONA and will continue for Mortlake South Wind Farm through the construction phase and upon the project becoming operational. A copy of the Risk Register is included at [Attachment 7b](#).

4.5.3 Compliance Register

The General Manager Safety & Compliance is responsible for regularly maintaining and reviewing MSWF's regulatory compliance obligations.

A draft regulatory compliance register for Mortlake South Wind Farm is attached at [Attachment 8](#). The register identifies MSWF's ongoing active compliance obligations anticipated to apply under electricity generator-specific laws, regulations, rules, codes and other regulatory instruments.

MSWF will further update this compliance register upon receipt of a generation licence and the successful registration with AEMO in order to reflect any licence and registration conditions as granted by the ESC and AEMO.

4.6 Governance Policies

Corporate governance underpins the way ACCIONA conducts its business. ACCIONA is committed to the highest level of governance and strives to foster a culture that values and rewards exemplary ethical standards, personal and corporate integrity and respect for others.

ACCIONA has an integrated approach to governance, risk and compliance as described in our Integrated Management System (**IMS**) Overview. Please refer to [Attachment 9](#).

ACCIONA has developed HSEQ policies and procedures (forming the 'IMS') to provide for compliance with the regulatory environment within which it operates. Regular internal and external audits will be carried out by ACCIONA management to verify that all requirements set out in the policies and procedures are understood and complied with by all relevant stakeholders.

Key Policies and Procedures contained in the ACCIONA IMS include (but are not limited to) the following:

- Code of Conduct;
- Integrated Management System Policy;
- Privacy Policy;
- Management Review Procedure;
- Document Control Procedure;

- Records Management Procedure;
- Risk Management Procedure;
- Non-Conformance Procedure;
- Crisis Management Procedure;
- HSE Risk Management Procedure; and
- Identification of HSE Legal & Other HSE Requirements Procedure.

4.7 References for Key Personnel

Please refer to section 1.6 and [Attachment 3](#).

4.8 Australian Financial Services Licence

ACCIONA Group's company, Acciona Energy Oceania Financial Services Pty Ltd (**AEOFS**), holds Australian Financial Services Licence No 421458. MSWF will enter into an intermediary authorisation agreement with AEOFS.

4.9 Demonstrations of Billing and Management Systems

To serve MSWF, ACCIONA has existing back-office billing and management systems in place that supports ACCIONA's existing operating assets. MSWF does not have any direct retailing contact or billing interactions with consumers.

4.10 Complaint Register and Procedure for Mortlake South Wind Farm

An endorsed complaint and evaluation process is in place for the Mortlake South Wind Farm. This process outlines how ACCIONA manages all complaints and enquiries received from the community and project neighbours both during the construction of and operation of the Mortlake South Wind Farm. ACCIONA is committed to:

- Acknowledging the importance and value of feedback (including enquiries and complaints);
- Providing an accessible avenue for people to provide feedback or raise concerns; and
- Ensuring all feedback is managed fairly, promptly, sensitively and efficiently.

A full-time Community Relations Coordinator is based on site during the construction phase with additional support being provided by a Community Relations Coordinator based in our Melbourne office. The Community Relations Coordinators and the Site Manager (once the site is operational) are responsible for ensuring all complaints are processed in accordance with this process. All complaints are registered through our community engagement software program - Consultation Manager.

Refer to the Mortlake South Wind Farm Complaint Investigation and Response Plan in [Attachment 10](#).

4.11 Privacy Statement

ACCIONA's Privacy Policy is attached at [Attachment 11](#).

4.12 Document Retention Policy

ACCIONA has a detailed Document Retention Policy, consistent with the required statutory obligations.

5 Other information in Support of a Generation Licence Application

5.1 Details of Experience in Electricity Industry

Please refer to section 4.1.

5.2 Experience of Directors and Senior Managers

Please refer to section 1.6 and [Attachment 3](#).

5.3 Capacity to Comply with Licence Conditions

ACCIONA, as a current licence holder and/or operator of electricity generation facilities through its subsidiary companies, has operated successfully in Australia since 2006. Section 4.4 lists the policies and procedures that ensure this capability is maintained.

5.4 Communication with AEMO

5.4.1 Generator Registration

MSWF has been registered as an Intending Participant in the NEM. The Generator Registration process with AEMO will progress in parallel with this Licence Application.

Please refer to [Attachment 12](#) for the Intending Participant Registration Letter from AEMO.

Note: The full Generation Registration process will commence immediately following execution of the Use of System Agreement.

5.4.2 Generator Performance Standards

ACCIONA has a regular ongoing meeting with AEMO specific to Mortlake South Wind Farm to discuss AEMO's requirements for the project including the Generator Performance Standards. ACCIONA will submit the proposed Generator Performance Standards as part of the connection application submission to AEMO. ACCIONA expects to reach accepted Performance Standards with AEMO during the 1st quarter of 2022.

5.5 Contact with Energy Safe Victoria

ACCIONA has a history of liaising with Energy Safe Victoria (**ESV**) to ensure the best approach is followed to ensure the safe operation of all of our operational sites. MSWF will continue to engage with ESV to adopt an appropriate safety management strategy for Mortlake South Wind Farm which may include the implementation of an Electricity Safety Management System (**ESMS**) as has been adopted for other operational ACCIONA projects such as Waubra Wind Farm.

5.6 Third Party Contracts

Please refer to section 1.7.

5.7 Planning and Environmental Approvals

Planning and Environmental approvals obtained for the Mortlake South Wind Farm include:

- Planning Permit (refer to [Attachment 13a](#));
- Federal EPBC Act referral determination as a 'non-controlled action' (refer to [Attachment 13b](#));
- Approved Cultural Heritage Management Plan (refer to [Attachment 13c](#));
- Endorsed Development Plans (refer to [Attachment 13d](#));
- Endorsed Onsite Landscaping Plan (refer to [Attachment 13e](#)); and
- Endorsed Environmental Management Plan (refer to [Attachment 13f](#)).
- Planning Permit for the interconnection line (refer to [Attachment 13g and 13h](#));
- Endorsed Environmental Management Plan for the interconnection line (refer to [Attachment 13i](#)); and
- Cultural Heritage Management Plan associated with the interconnection line (refer to [Attachment 13j](#)).

5.8 Land Ownership / Access Arrangement

MSWF leases land required for the Mortlake South Wind Farm with various project landowners. Land tenure/access arrangements for the 15km 220kV underground line between the onsite substation and the Terang Terminal Station involves a combination of: (1) wind farm leases between MSWF and several project landowners; (2) access licence between MSWF and VicTrack; and (3) Options for Easement between MSWF and several landowners. Part of the underground line is also to be constructed in road reserves managed by Moyne Shire Council, Corangamite Shire Council and VicRoads.

5.9 Risk, Governance and Compliance Management

Please refer to section 4.5

5.10 Evidence of Operating a Successful Business

ACCIONA has had a presence in Australia since 2002 and has actively participated in the electricity industry in Australia since 2006. AEG SL owns and operates the Mt Gellibrand Wind Farm (100%), Waubra Wind Farm (100%), Gunning Wind Farm (100%) and Cathedral Rocks Wind Farm (50%).

ACCIONA's business model is to be a long term owner and operator of renewable energy assets in Australia and will continue to develop, invest in and operate a growing portfolio of generating assets in the NEM.

5.11 Cross Ownership

Not Applicable.

6 Statutory Declaration

Please refer to [Attachment 14](#) for Statutory Declaration confirming that the Applicant believes that the information contained in this application, and the attachments hereto, is true and correct.

List of Attachments