

ESSENTIAL SERVICES COMMISSION
GENERATION
AUTHORITY APPLICATION
GLENROWAN WEST SOLAR FARM

Public submission



06 August 2020

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2 INTRODUCTION

Wirtgen Invest¹ is a private German family office that is the equity owner of Glenrowan Sun Farm Pty Ltd which is developing and building the Glenrowan West Solar Farm (GWSF). Wirsol Energy Pty Ltd (WEL) on behalf of Glenrowan Sun Farm Pty Ltd. is submitting this generation licence application for GWSF to generate, sell and supply electricity into the National Electricity Market (NEM).

GWSF is a 149 MWp DC (110 MW AC) single axis tracking project located in Victoria approximately 250 km north east of Melbourne. It consists of tier 1 equipment including:

- 48 SMA 2.75MW SMA² inverters¹,
- 373,248 Jinko³ 395/400 Wp modules (average 398.9795 Wp per module); and
- a horizontal single axis tracking system by NEXTracker⁴

When it is commissioned the solar farm is expected to result in annual savings of 110,000 tonnes of CO2 and power approximately 41,000 homes⁵.

Glenrowan Sun Farm Pty Ltd engaged Signal Energy Australia⁶ to construct the solar farm and its associated substation under a fully wrapped Engineering, Construction and Procurement (EPC) Contract.

The project received a 5.3.4A letter⁷ of approval from AEMO in January 2018 at the time of executing the connection agreement with AusNet Services.

Design commenced late 2019 and construction commenced in January 2020. Orders for all major items of equipment have been ordered. Major project milestones include substation energisation by Q3 2020 and the solar farm to first commence generating electricity to the network by Q4 2020. Commercial operation date is scheduled to occur by Q1 2021.

All output (electricity and large-scale generation certificates (LGCs) from the Glenrowan West Solar Farm will be sold into the NEM. An option to enter into a Power Purchase Agreement is being reviewed.

¹ <https://www.wirtgen-invest.de/en/>

² SMA are a leading supplier of utility scale solar farm inverters globally. See <https://www.sma.de/en.html>

³ <https://www.jinkosolar.com/>

⁴ <https://www.nextracker.com/>

⁵ <https://www.glenrowanwestsolarfarm.com.au/#about>

⁶ <http://www.signalenergy.com/>

⁷ Attachment 1 GWSF - Project Management Contract (executed) - v1.0 (1)_Redacted

WEL has been engaged to undertake construction management services on behalf of Glenrowan Sun Farm Pty Ltd including registration of GWSF with the relevant regulatory bodies including AEMO, the Essential Services Commission (ESC), the Clean Energy Regulator (CER) and Greenpower. In addition will undertake all operations and maintenance activities of the solar farm on behalf of Glenrowan Sun Farm Pty Ltd for at least the first two years of operation. WEL has also been engaged to undertake the Technical Asset Management functions for GWSF.

GWSF will be connected via a short 66 kV circuit to the AusNet Glenrowan Terminal Station. Glenrowan Sun Farm Pty Ltd entered into a Connection Services Agreement with AusNet⁸ in July 2019 for the grid connection works. AusNet is responsible for the construction of the connection assets between the AusNet Glenrowan Terminal Station and the Glenrowan West Solar Farm substation. These works are on scheduled and expected to be completed by Q3 2020.

Glenrowan West Solar Farm has submitted its application for registration as a market generator with AEMO to demonstrate its ability to comply with the requirements of National Electricity Rules.

WEL will provide Australian based staff and expertise for the operation of the solar farm in the NEM as well as provide services to ensure compliance with the generation licence in Victoria. WEL has Australian based staff who have a wide range of experience operating solar farms in the NEM. The experience includes planning compliance, design, technical compliance, regulatory compliance and O&M.

Wircon, WEL's parent company, is the equity owner of the

- Wemen Solar Farm (100%)
- Gannawarra Solar Farm (95%)
- Gannawarra Battery (50%)

in Victoria and

- Hamilton Solar Farm (95%)
- Whitsunday Solar Farm (95%)
- Clermont Solar Farm (100%)

in Queensland.

It is also responsible for O&M and Asset Management of the Wemen and Clermont Solar Farms.

As well as Australian based staff, WEL is able to draw on the experience of its overseas operations as required.

⁸ ESC Generation Authority Application – Glenrowan West Solar Farm
1.4.3.21 Glenrowan - Connection Services Agreement AusNet dated 1 July 2019.PDF

3 INFORMATION ON APPLICANT AND NATURE OF THE APPLICATION

3.1 APPLICANT INFORMATION

Name of the project	Glenrowan West Solar Farm
Name of applicant	Glenrowan Sun Farm Pty Ltd
ABN	ABN: 49 620 923 748 ACN: 620 923 748
Registered / Postal Address	9 Matcham St Jordan Springs NSW 2747
Contact person	Garth Gum Gee Connections Manager E: garth.gumgee@wirsol.com M: +61 418 174 616

3.2 OWNERSHIP INFORMATION

3.2.1 Corporate and Financial Structures

Glenrowan West Solar Farm is fully owned by the Glenrowan Sun Farm Pty Ltd which is ultimately owned by Wirtgen Invest GmbH a private German family office⁹.

⁹ ESC Generation Authority Application – Glenrowan West Solar Farm
<https://www.wirtgen-invest.de/en/family-office/>

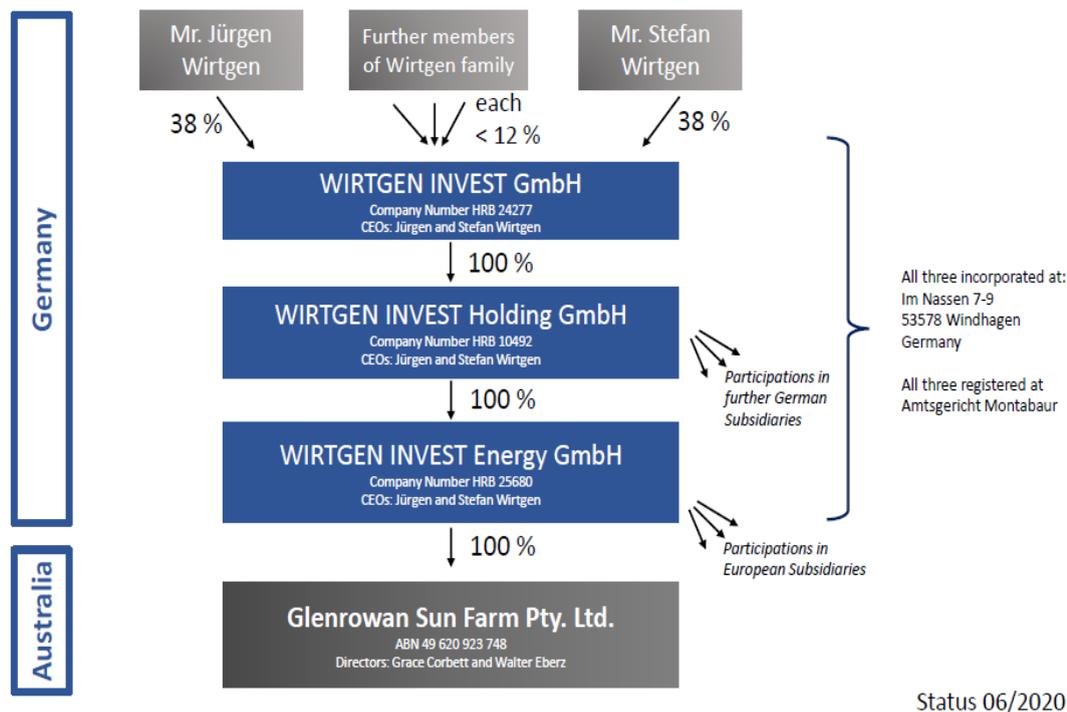


Figure 1 Glenrowan West Solar Farm Ownership Structure

Glenrowan Sun Farm Pty Ltd has a Project Management Agreement¹⁰ with Wircon GmbH to cover the planning, project execution and completion of the solar farm. Those services are undertaken by Wirsol Energy Pty Ltd in Australia as an entity of the Wircon group of companies. The organisation structure¹¹ showing Wirsol Energy Pty Ltd within the Wircon group is attached. In addition it shows the current solar farms that is owned and operated by the Wircon group in Australia.

3.3 INSTITUTIONAL EXPERIENCE

3.3.1 Wirsol

Wirsol¹² is a specialist European renewable energy developer and investor, specialising in photovoltaic systems.

To date Wirsol have reached more than 8,500 customers through consistent investment and competency in photovoltaic and wind power systems. Know-how in engineering, gathered from more than 800 MWp of installed power implementing high quality state-of-the-art technology, are the key factors for success. The table below shows Wirsol’s experience in the design, construction, operation and maintenance, asset management and financing of solar farms across Europe, North America and Australia. Wirsol undertakes each or all of these functions depending on the project requirements.

Installed PV Solar Sites (Historic)

Country	Installed Capacity (MW)
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¹⁰ Attachment 1 GWSF - Project Management Contract (executed) - v1.0 (1)_Redacted)

¹¹ Attachment 2 - 2020-05-07 WEL Group Project Structure Diagram v1.0

¹² <https://wirsol.com.au/>

Germany	>380
Spain	>80
Italy	>50
Denmark	>60
Netherlands	>30
Canada	>10
Portugal	>200
Other	>30
France	>30
Australia	670 (Hamilton/Whitsunday/Gannawarra/Clermont/Wemen)

In addition Wirtgen Invest¹³ have developed solar farms in Czech Republic as well as wind farms in Sweden and Poland.

This demonstrates the combined experience of developing, owning and operating renewable generators around the world and in Australia.

3.4 KEY CONTRACTS AND AGREEMENTS

The below table lists some of the key contracts for Glenrowan West Solar Farm has entered into for the construction and long-term operation and maintenance.

Agreement	Glenrowan West Solar Farm Counterparty
Generator Connection and Access Agreement ¹⁴	AusNet Services
Network Extension Agreement ¹⁵	AusNet Services
AEMO Generation Registration	AEMO (submitted)
Engineering, Procurement, Construction ¹⁶ Contract	Signal Energy Australia
Operations & Maintenance (O&M) services Contract	Wirsol Energy Pty Ltd
Asset Management Agreement	Glenrowan Sun Farm Pty Ltd
Project Management Agreement ¹⁷	Wircon GmbH

3.5 PLANNING AND ENVIRONMENTAL APPROVALS

¹³ <https://www.wirtgen-invest.de/en/energy/>

¹⁴ Attachment 3 -1.4.3.21 Glenrowan - Connection Services Agreement AusNet dated 1 July 2019.PDF

¹⁵ Attachment 5 - GWSF - Network Extension Agmt (executed) - v1.0

¹⁶ Attachment 4 - GWSF - EPC Contract (executed) - v1.0 (1)_Redacted
ESC Generation Authority Application - Glenrowan West Solar Farm

¹⁷ Attachment 6 - GWSF - Project Management Contract (executed) - v1.0 (1)_Redacted

All required planning and environmental approvals have been obtained, including the Development Approval (DA). All material continuous obligations in terms of planning and environmental approvals continue to be complied with during the construction period.

Attachment 7 GWSF - Planning Amendment Approval P0165-17 - v1.0 (1)

Attachment 8 GWSF - Planning Approval P0165-17 No Permit - v1.0 (1)

Attachment 9 GWSF - Planning Approval P0165-17 Permit - v1.0 (1)

Attachment 10 Permit Approved – Owner

Attachment 11 Building Permit

3.5.1 Development Approval

Development approval for the Glenrowan West Solar Farm was granted by the Victorian Civil and Administrative Tribunal on 22 June 2018¹⁸.

3.5.2 EPBC Approval

A biodiversity assessment was undertaken and it was identified that an EPBC assessment was not required

3.6 LAND OWNERSHIP AND ACCESS ARRANGEMENTS

On 20 January 2020 Glenrowan West Sun Farm entered into a 25 year, lease with the freehold landowner, Mokoan Management Services Pty Ltd and Marowe Pty Ltd for the land to construct and operate the solar farm. A copy of the leases is provided^{19,20}

3.7 DETAILS OF REGULATORY ACTION

No prosecutions or regulatory complaints have commenced against the Applicant or any other company or person related to or associated with the Applicant.

3.8 ENERGY SAFE VICTORIA AND OBLIGATIONS UNDER THE ELECTRICITY SAFETY ACT 1998 (VIC)

As the EPC contractor, Signal Energy Australia (SEA) is responsible for design and construction of the solar farm in compliance with the Electricity Safety Act 1998 (Vic).

SEA has undertaken the following activities and correspondence with Energy Safe Victoria (ESV).

- SEA has made contact with ESV to seek advice on its' obligations in meeting the Electricity Safety Act 1998 (Vic).

¹⁸ Attachment 12 GWSF - VCAT Tribunal Planning Approval P0165-17 - v1.0 (1)

¹⁹ Attachment 13 GWSF - Lea Lease (executed) - v1.0
ESV Generation Authority Application - Glenrowan West Solar Farm

²⁰ Attachment 14 GWSF - Welsh Lease (executed) - v1.0 (1)

- SEA are preparing a High Voltage operation protocol and contact name list as requested by Powercor for operation of the HV substation.

3.9 DETAILS OF LICENCE SOUGHT

Glenrowan Sun Farm Pty Ltd is seeking a generation license for Glenrowan Solar Farm.

The solar farm substation is on target to be energised September 2020. The solar farm is expected to generate electricity into the network from December 2020. In order to accommodate flexibility in the construction programmes, Glenrowan Sun Farm Pty Ltd is seeking a generation license from 1 September 2020. This licence needs to be provided to AEMO as part of the AEMO Generation Registration approval process.

The electricity generated will be sold into the National Electricity Market (NEM). As referenced in Section 1 above, for the period from commencement of operations the electricity will be sold on a merchant basis into the NEM. The option of entering into a Power Purchase Agreement (PPA) is also being considered.

Glenrowan Sun Farm Pty Ltd is not seeking any non-standard license conditions.

3.9.1 Details of current or former licences held in this or other jurisdictions.

Glenrowan Sun Farm Pty Ltd has never held or applied for a license in Victoria or any other jurisdiction, nor has it had a license refused.

3.9.2 Licenses held by associates of the applicant.

Wirsol Energy Pty Ltd as a subsidiary of Wircon GmbH acts on behalf of Glenrowan Sun Farm Pty Ltd. Wircon GmbH as the ultimate owner of Wel 1 Pty Ltd and Welee Australia Pty Ltd owns 95% Gannawarra Solar Farm Pty Ltd which has a generation licence from the ESC to operate the Gannawarra Solar Farm. The generation licence was granted on 14 March 2018²¹. Wircon GmbH also owns 50% of the Gannawarra Battery which also has a generation licence from the ESC. In addition Wircon GmbH owns, operates and maintains the Wemen Solar Farm.

Whitsunday Solar Farm Pty Ltd and Hamilton Solar Farm (wholly owned subsidiaries of Welee Australia Hold Co Pty Ltd) have generation licences in Queensland from the Department of Natural Resources, Mines and Energy (DNRME).

²¹ ESC Generation Authority Application – Glenrowan West Solar Farm
Attachment 15 - GANN - Electricity Generation Licence - v1.0

Whitsunday Solar Farm Pty Ltd and Hamilton Solar Farm Pty Ltd were registered as Market Participants in the NEM with AEMO²² on 28 May 2018 while Gannawarra Solar Farm Pty Ltd was registered with AEMO on 19 March 2018.

²² <http://www.aemo.com.au/Electricity/National-Electricity-Market-NEM/Participant-information/Current-participants/Current-registration-and-exemption-lists>

4 THE COMMISSIONS' OBJECTIVES

4.1 ESSENTIAL SERVICES COMMISSION ACT OBJECTIVES – SECTIONS 8(1) AND 8(2)

The Objective of the Commission is set out under sub-section 8(1) of the Essential Services Commission Act 2001 (ESC Act) as follows:

In performing its functions and exercising its powers, the primary objective of the Commission is to protect the long term interests of Victorian consumers.

Granting a generation license to Glenrowan Sun Farm Pty Ltd for the Glenrowan West Solar Farm is consistent with the objectives of the Commission in terms of protecting the long term interests of Victorian consumers. Glenrowan West Solar Farm is a dedicated, standalone, financially viable generator (with funding for all of its obligations already committed) supported by leading companies in the Australian energy market. It has the backing of international financing (Wirtgen Invest) and local expertise (Wirsol Energy) to ensure that it is able to meet its obligations under the generation licence.

As a solar energy generator Glenrowan West Solar Farm will provide low marginal cost energy into the NEM, increase and diversify the supply of energy in Victoria, leading to increased supply, reliability and reduced energy costs. Modern utility scale solar inverters are capable of providing sophisticated grid support, including fast response power factor control and voltage ride through capabilities.

Further, the environment in Victoria will benefit from increased zero emission electricity generation. Under sub-sections 8(1) and 8(2) of the ESC Act, the Commission must have regard to a number of matters in seeking to achieve the Objective. The Applicant believes that granting of the license is consistent with these matters, described in sub-section 8A(1), as follows:

4.1.1 Efficiency in the industry and incentives for long term investment

Glenrowan West Solar Farm will contribute to increased efficiency in the electricity market through additional diversity of supply and competition. The project provides significant investment into the Victorian electricity market via equity capital from Wirtgen Invest.

Utility scale solar PV is an established technology with approximately 300 GW installed globally²³ in 2020 and over 2 GW financially closed and under construction or operational in Victoria according to the AEMO 2019 ESOO²⁴.

²³ <https://www.climatecouncil.org.au/resources/solar-report/>

²⁴ https://www.aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/nem_esoo/2019/2019-electricity-statement-of-opportunities.pdf?la=en&hash=7FE871D75A9C619AB66FA671477551B2

The operational risks of utility solar farms are low and well understood. The operational design life of the project is 30 years.

In addition Victoria as well as other NEM regions are experiencing less reliable sources of generation supply from existing coal generating plant. The summer of 2019/20 saw the breakdown of 750 MW of capacity resulting in AEMO contracting for 125 MW of firm reserves over this period²⁵. Glenrowan West Solar Farm therefore helps secure the supply of energy for Victorian consumers.

4.1.2 The financial viability of the industry

Glenrowan West Solar Farm is independently financed by Wirtgen Invest.

Glenrowan West Solar Farm operates in a financially viable industry. The NEM has existed as a liberalised wholesale spot market for electricity for almost 20-years, trading circa 190 to 200 TWh per annum worth almost \$17bn in 2016-17 and with some 200+ registered participants and 53GW of installed capacity²⁶.

Equity and debt markets are providing long term finance to solar PV, even with merchant exposure, recognising it as one of the lowest cost forms of electricity generation in the NEM. Glenrowan West Solar Farm does not rely on any external debt financing for the project to proceed. To a certain extent there are shareholder loans by the mother company.

Capital costs are expected to continue to fall going forward. The recent Queensland 400 Renewables request for tender²⁷ attracted 115 tenders. While the recent New South Wales Expression of Interest for the Central West Renewable Energy Zone (REZ)²⁸ attracted 27 GW and 113 proposals to connect.

In June 2016, the Victorian Government committed to Victorian Renewable Energy generation Target of 25 per cent by 2020 and 40 per cent by 2025 (VRET)²⁹. One mechanism to help achieve the VRET is the establishment of the Victorian Renewable Energy Auction Scheme (VREAS)³⁰ under which the Victorian Government awarded commercial contracts in support of up to 650 MW of new renewable energy generation.

The format of the auction was a reverse auction, with bids accepted for up to 550 MW of large scale technology neutral renewable energy and for up to 100 MW of large scale solar-specific renewable energy.³⁸

²⁵ https://www.aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/nem_esoo/2019/2019-electricity-statement-of-opportunities.pdf?la=en&hash=7FE871D75A9C619AB66FA671477551B2

²⁶ <http://www.aemo.com.au/-/media/Files/Electricity/NEM/National-Electricity-Market-Fact-Sheet.pdf>

²⁷ <https://www.climatecouncil.org.au/uploads/a1a456a201a175c4bb34f684f6f9dcbd.pdf>

²⁸ <https://energy.nsw.gov.au/renewables/renewable-energy-zones>

²⁹ <https://www.energy.vic.gov.au/renewable-energy/victorias-renewable-energy-targets>

³⁰ <https://www.energy.vic.gov.au/renewable-energy/victorian-renewable-energy-auction-scheme>

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

Glenrowan West Solar Farm provides a positive contribution to the diverse and competitive supply of electricity to Victorian consumers via the creation of a new electricity generation asset which is consistent with the objective of this matter.

Glenrowan West Solar Farm is expected to be a price-taker and therefore will not be able to set the market price nor wield significant market power. This has the potential to lower market spot prices. Relative to other generators within Victoria and the NEM as a whole, Glenrowan West Solar Farm can be considered only a minor player in the industry. The total existing generation fleet in Victoria totals almost 11,000 MW while Glenrowan West Solar Farm will have a capacity of 110 MW or 0.01% of the current generation fleet in Victoria.

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

Construction and operation of the solar farm will be subject to all relevant health, safety, environmental and social legislation applying to the Victorian electricity industry.

4.1.5 Benefits and Costs of Regulation

The benefits and costs of regulation (including externalities and the gains from competition and efficiency) for (a) consumers and users of products or services (including low income and vulnerable consumers) and (b) regulated entities.

Glenrowan West Solar Farm will seek to minimise the costs of regulation and allow consumers and users of electricity (including low income and vulnerable consumers) to receive the benefits of increased renewable energy supply. These include reduced cost, and increased reliability and quality, of electricity supply, and environmental and health costs.

4.1.6 To promote consistency in regulation between States and on a national basis.

Glenrowan West Solar Farm will operate as a semi-scheduled generator, will be registered with AEMO, and is required to comply with the National Electricity Rules.

In addition, Glenrowan West Solar Farm will generate LGCs under the Renewable Energy (Electricity) Act 2000 (Cth).

5 FINANCIAL VIABILITY

As set out earlier in this Application, Glenrowan West Solar Farm has been fully equity financed. The equity project financing means that this project is fully capitalised to meet all contractual commitments to construct the project and bring them into operation.

Glenrowan West Solar Farm can meet and address the financial viability requirement, and can be summarised as follows:

- Glenrowan West Solar Farm is 100% owned by Glenrowan Sun Farm Pty Ltd³¹ which is part of the WIRTGEN INVEST group with Wirtgen Invest GmbH, a private German company, as its top holding.
- Glenrowan Sun Farm Pty Ltd is a subsidiary of Wirtgen Invest Energy GmbH which is part of the Wirtgen Invest GmbH a private German company.
- There is no external debt funding for the construction of the solar farm.
- Revenue will be from spot market sales. An option to enter into a Power Purchase Agreement is under consideration.

5.1 BALANCE SHEET AND SUPPORTING INFORMATION

5.1.1 Balance Sheet and financial data

The Glenrowan Sun Farm Pty Ltd balance sheet and financial data, including a statement of assets and liabilities are provided directly to the ESC as a commercial in confidence submission.

5.1.2 External Auditor Statements and Credit Rating

There are no statements available from external advisors, nor has a rating been provided by any credit agency.

The fact that the solar farm has been project financed without external debt demonstrates sufficient financial resources to sustain a viable business in the electricity industry.

5.1.3 Business Plan

Glenrowan Sun Farm Pty Ltd is engaged solely in the generation of electricity from its single asset Glenrowan West Solar Farm. It has no other businesses in Australia. Its business plan is to simply maximise the volume of electricity and LGCs generated at the solar farm. It has entered into:

- a full-service O&M agreement with Wirsol Energy Pty Ltd; and
- subcontracted the NEM technical components asset management agreement with Wirsol Energy Pty Ltd.

³¹ ESC Generation Authority Application – Glenrowan West Solar Farm
Attachment 16 -1.13 WIRTGEN INVEST Structure Chart June 2020

A detailed financial model outlining the key assumptions which form the basis of the financial viability of the solar farm is attached³².

5.1.4 Documentation to substantiate source of funding

A Statutory Declaration signed by a director of Glenrowan Sun Farm Pty Ltd has been provided which declares there has been no material change to the financial position of the applicant is provided³³.

5.1.5 Australian Financial Services Licence

Glenrowan West Sun Farm Pty Ltd, does not require an Australian Financial Services License. It does not intend to undertake any of the activities which require an Australian Financial Services Licence, ie:

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

5.1.6 INSURANCE ARRANGEMENTS

Glenrowan West Solar Farm has in place all the necessary insurance policies for a project of this type and size, including:

- Contract Works Insurance³⁴
- Worker's Compensation³⁵
- Motor Vehicle³⁶
- Professional Indemnity³⁷
- Public, Product & Umbrella Liability³⁸
- Victoria Workcover³⁹

³² Attachment 17 - 2.6 GSF Pty Ltd. Financial Model 30 years, Status June 2020

³³ Attachment 18 -3.26 Statutory Declaration on lack of material changes

³⁴ Attachment 19 -GWSF - EPC Contract Schedule 12 - Insurance - v1.0

³⁵ Attachment 20 - GWSF - Insurance Signal icare NSW Workers CoC (exp 31.03.21) - v1.0

³⁶ Attachment 21 - GWSF - Insurance Signal Motor Vehicle CoC (exp 31.10.20) - v1.0

³⁷ Attachment 22 - GWSF - Insurance Signal Professional Indemnity CoC (exp 01.03.21) - v3.0

³⁸ Attachment 23 - GWSF - Insurance Signal Public, Product & Umbrella Liability CoC (exp 31.07.20) - v1.0

³⁹ Attachment 24 - GWSF - Insurance Signal Victoria WorkCover CoC (exp 30.06.21) - v1.0

6 INFORMATION ON TECHNICAL ABILITY

6.1 ORGANISATIONAL CHART OF KEY PERSONNEL WITH DETAILS OF EXPERIENCE AND KNOWLEDGE OF THE INDUSTRY

Glenrowan Sun Farm Pty Ltd has engaged Wirsol Energy Pty Ltd (WEL) to provide ongoing O&M and Asset Management Services for the Glenrowan West Solar Farm. WEL currently undertakes O&M and Asset Management services for the Clermont and Wemen Solar Farms. The O&M capabilities are outlined in the attached presentation⁴⁰. WEL personnel⁴¹ have several years of knowledge of both operating in overseas markets and the Australian market. In addition if necessary WEL can draw on other entities within the Wircon group for specific experience and knowledge of equipment, O&M, Asset Management and financial operations from overseas markets.

6.2 CONTRACTS WITH EXTERNAL PROVIDERS

The project is being delivered as an EPC contract with Signal Energy Australia (SEA)⁴². This includes all major equipment supply including contracts with external suppliers and supply contracts except for the PV panels. The PV Panels are being provided under a separate contract by the principal (Wirtgen Invest).

In addition the ongoing operation and maintenance activities and key components of the asset management are being undertaken as a contract with Wirsol Energy Pty Ltd.

6.3 STATEMENTS FROM INDUSTRY BODIES

Glenrowan Sun Farm Pty Ltd has not participated in the Victorian Electricity Industry previously, so we are unable to provide any statements from bodies such as Energy and Water Ombudsman Victoria (EWOV). However, the Applicant has entered into a Generator Connection and Access Agreement and a Generator Deed with Ausnet⁴³ and has submitted a generation registration application with AEMO.

- AEMO: Generator registration Application⁴⁴

The applications with the following regulatory bodies will be submitted shortly:

- Clean Energy Regulator: LCG registration
- GreenPower Australia – GreenPower accreditation

6.4 INTERNAL CONTROLS, POLICIES AND GOVERNANCE PROCEDURES

⁴⁰ Attachment 25 - Wirsol OM Capability Presentation 2020.06.08R2

⁴¹ Attachment 26 - Annex 1 - WEL Aus Team Bios 30052020

⁴² Attachment 3 GWSF - EPC Contract (executed) - v1.0 (1)_redacted

⁴³ Attachment 3 - 1.4.3.21 Glenrowan - Connection Services Agreement AusNet dated 1 July 2019

⁴⁴ Attachment 27 - RE GEN0004388 - Wirsol Energy Pty Limited - Glenrowan West Solar Farm - Semi-Scheduled Generator ESC Generation Authority Application - Glenrowan West Solar Farm

All contractors under Wirsol Energy Pty Ltd must abide by Wirsol's Health and Safety Policy⁴⁵:

- Key officer obligations and liabilities are set out in the Employer's Requirements⁴⁶ and their liabilities are covered in the Parent Company Guarantee⁴⁷.
- Glenrowan West Solar Farm Risk Management Plan

A compliance register has been developed which summarises key contractual and regulatory obligations.

6.5 BUSINESS MODEL

Refer to Business Plan 5.1.3.

6.6 RISK MANAGEMENT POLICIES

Glenrowan Sun Farm Pty Ltd has managed risk by only engaging reputable contractors with accredited systems in place for managing quality, health and safety and the environment.

Signal Energy Australia, the primary contractor engaged to build and operate the solar farm has the following accreditations in place:

- AS/NZ 4801 Workplace Health and Safety Management
- ISO 9001 Quality Management
- Federal Safety Commission (FSC) Accreditation
- ISO14001 Environmental Management

SEA has developed a Risk Management plan and is outlined in their Construction Management Plan⁴⁸. A risk register has been developed and is maintained throughout the construction and operational phases of the project.

6.7 DEMONSTRATIONS OF BILLING AND MANAGEMENT SYSTEMS

Glenrowan West Solar Farm is currently under construction, and therefore billing and operational management systems are not yet implemented. We note that as a generator, Glenrowan West Solar Farm, does not have any direct contact or billing interactions with consumers in Victoria. The billing and operational management will be maintained through Wirsol Energy Pty Ltd.

6.8 OTHER (COMPLAINTS, PRIVACY STATEMENTS, DOCUMENT RETENTION POLICIES)

Glenrowan Sun Farm Pty Ltd will comply with all document retention policies and includes privacy statements based on relevant laws and regulations that apply to Glenrowan West Solar Farm. Currently all documentation and records are stored on company sharepoint site.

⁴⁵ Attachment 28 -WIR-HS-POL-0005-V0-WHS Policy (1)

⁴⁶ Attachment 29 -GWSF - EPC Contract Schedule 1 - Principals Reqts - v1.0 (1)

⁴⁷ Attachment 30 -GWSF - EPC Contract Schedule 11 - EMI Legal Opinion - v1.0

⁴⁸ Attachment 1.4 6022-SEA-GN-PLN-002-001_6022-SEA-GN-PLN-002-1 - Construction Management Plan_Final

Should any complaints arise, they will be managed through communication with the Asset Manager of Wemen Solar Farm, Wirsol Energy Pty Ltd and recorded on a complaints register.

6.9 COMPLAINTS

As a generator, Glenrowan Sun Farm Pty Ltd, does not have any direct contact or billing interactions with consumers in Victoria. Consequently, we would not anticipate receiving complaints from end consumers in their capacity as energy customers.

Complaints during the construction phase can be sent via email, the Glenrowan West Solar Farm website⁴⁹, or the contact number listed on the project website⁵⁰.

6.10 INFORMATION IN SUPPORT OF A GENERATION LICENCE APPLICATION

6.10.1 Details of experience in and knowledge of the electricity industry

As a newly incorporated entity, Glenrowan Sun Farm Pty Ltd's knowledge of and experience in the Australian electricity industry is derived from the operators – Wirsol Energy Pty Ltd (WEL). WEL through its parent company owns the Wemen and Gannawarra⁵¹ Solar Farms and 50% of the Gannawarra Battery in Victoria. It also owns the Whitsunday⁵² and Hamilton⁵³ Solar farms in Queensland. It is also developing up to 4 other solar farms^{54 55 56} across Queensland and New South Wales with a capacity up to 700 MW. WEL has a depth of experience in the ownership, operation and asset management of its portfolio in Australia. In addition it is able to draw on experience from its parent company in the UK and Europe. In addition Glenrowan Sun Farm Pty Ltd via its parent company is able to draw on experience in the development and ownership of renewable projects in Europe.

The operators and asset manager provider for Glenrowan West Solar Farm – Wirsol Energy Pty Ltd– has a strong track-records of successfully operating businesses in the electricity industry both in Australia and internationally.

Wirsol have extensive international know-how through consistent investment and competency in photovoltaic and wind power systems, gathered from more than 800 MWp of installed power implementing high quality state-of-the-art technology.

The capability of Wirsol Energy Pty Ltd as the asset management provider is demonstrated by a management team which seeks to

- Manage projects during construction and ongoing operations

⁴⁹ <https://www.glenrowanwestsolarfarm.com.au/index#contact>

⁵⁰ <https://www.glenrowanwestsolarfarm.com.au/index#contact>

⁵¹ <https://wirsol.com.au/portfolio/gannawarra-solar-farm/>

⁵² <https://wirsol.com.au/portfolio/whitsunday-solar-farm/>

⁵³ <https://wirsol.com.au/portfolio/hamilton-solar-farm/>

⁵⁴ <https://wirsol.com.au/portfolio/rodds-bay-solar-farm/>

⁵⁵ <https://wirsol.com.au/portfolio/springsdale-solar-farm/>

⁵⁶ <https://wirsol.com.au/portfolio/bomen-solar-farm/>

- Undertake asset management of a portfolio across several jurisdictions
- Ensure services are tailored to suit each project's unique requirements in order to
 - Maximise the productivity and longevity of the assets
 - Provide rigorous financial management and reporting
 - Ensure a strong community focus and maintain excellent working relationships
 - Maximise commercial viability and ensure that renewable energy is affordable and available.

6.10.2 A summary of the skills and experience of the directors and senior managers and their relevance to meeting the requirements of the license

The senior management team⁵⁷ of Wirsol Energy Pty Ltd have the skills and experience to ensure the governance requirements of the license are met.

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

Glenrowan Sun Farm Pty Ltd has all necessary expertise to comply with generator license conditions, codes and guidelines through the experience of directors, a strong financial position. The Australian internal team⁵⁸ at Wirsol have a strong background in the operation and regulatory framework in Australia and are supported by the UK based Wirsol Pty Ltd.

6.10.4 Evidence of any interactions or preliminary registration with Ausnet and AEMO

The registration of Glenrowan Solar Farm. A generation registration application was submitted to AEMO 17 June 2020⁵⁹.

In addition Glenrowan Solar Farm has entered into a Network Extension Agreement with AusNet Services⁶⁰.

6.10.5 Reliance on other entities

If the applicant is to rely on another entity to provide staff and resources, a summary of the relationship between the applicant and this entity, including any formal agreements to provide services, and a summary of this other entity's experience in and knowledge of the electricity industry, and technical capacity to meet the relevant requirements of the licence.

As noted, Wirsol Energy Pty Ltd will be providing Asset Management services to Glenrowan West Solar Farm for a duration of up to 2 years under a full service Asset Management Agreement. Under this agreement Wirsol Energy Pty Ltd will be responsible for providing:

- Management of the Health and Safety obligations and systems

⁵⁷ Attachment 31 -Annex 1 - WEL Aus Team Bios 30052020

⁵⁸ Attachment 32 -Annex 1 - WEL Aus Team Bios 30052020

⁵⁹ Attachment 33 - RE GEN0004388 - Wirsol Energy Pty Limited - Glenrowan West Solar Farm - Semi-Scheduled Generator ESC Generation Authority Application – Glenrowan West Solar Farm

⁶⁰ Attachment 3 - 1.4.3.21 Glenrowan - Connection Services Agreement AusNet dated 1 July 2019

- Environmental compliance
- Management of the O&M agreement and operational performance measures
- Management of the Connection Agreement
- Selling of output including the creation and registration of Green Products,
- Generator registration
- Trading in the NEM
- Ensuring compliance with standing legislative and regulatory obligations

Operations and Maintenance services will be provided by Wirsol Energy Pty Ltd for at least the first two years.

6.10.6 Confirmation that all planning and environmental approvals have been completed

As noted in Section 0 above, all required planning and environmental approvals have been obtained and any continuous obligations in terms of planning and environmental approvals will be complied with.

6.10.7 Risk, governance and compliance management and strategies

See sections 6.6 and 6.4

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

Reputable and experienced contractors have been engaged to build and operate the solar farm, and provide asset management services over the long term.

The owners, operator and maintenance provider of Glenrowan West Solar Farm, Wirsol, has a strong track-record of successfully operating businesses in the electricity industry internationally and domestically.

All these factors ensure that the Applicant can successfully operate Glenrowan West Solar Farm within the electricity industry.

6.10.9 Confirmation that there are no cross-ownership issues arising under the provisions of Part 3 of the EI Act – cross ownership.

No longer applicable as Part 3 of the Act has been removed⁶¹.

7 Schedule 4 – Fit and proper person

1. Have any directors of the applicant or of any entity that can exert control over the applicant:

- (a) been declared bankrupt → no
- (b) had their affairs placed under administration → no
- (c) been disqualified from managing a company. → no

If yes, provide details:

⁶¹ ESC Generation Authority Application – Glenrowan West Solar Farm
http://classic.austlii.edu.au/au/legis/vic/consol_act/eia2000261/

2. 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 been subject to:

(m) any debt judgments, or → no

(n) insolvency proceedings (including any administration, liquidation or receivership in connection with the affairs of a company)? → no

If yes, provide details:

3. 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 been charged with fraud, theft or any other criminal offence? → no

If yes, provide details:

4. 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 Essential Services Commission? → no

If yes, provide details:

5. 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 limited to, the Competition and Consumer Act 2010 (Cth), Corporations Act 2001 (Cth), or the Australian Securities and Investments Commission Act 2001 (Cth))? → no

If yes, provide details:

6. 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? → no

If yes, provide

8 Schedule 5 – Statutory declaration

Refer to Statutory Declaration – Schedule 5

¹² Generators are not required to join the Energy and Water Ombudsman (Victoria)

9 LIST OF ATTACHMENTS (COMMERCIAL In CONFIDENTIAL – NOT FOR PUBLICATION)

Attachment 1 GWSF - Project Management Contract (executed) - v1.0 (1)_Redacted
Attachment 1.4.3.21 Glenrowan - Connection Services Agreement AusNet dated 1 July 2019
Attachment 2 - 2020-05-07 WEL Group Project Structure Diagram v1.0
Attachment 3 - 1.4.3.21 Glenrowan - Connection Services Agreement AusNet dated 1 July 2019
Attachment 4 - GWSF - EPC Contract (executed) - v1.0 (1)_redacted
Attachment 5 - GWSF - Network Extension Agmt (executed) - v1.0
Attachment 6 - GWSF - Project Management Contract (executed) - v1.0 (1)_Redacted
Attachment 15- GANN - Electricity Generation Licence - v1.0
Attachment 7 GWSF - Planning Amendment Approval P0165-17 - v1.0 (1)
Attachment 8 GWSF - Planning Approval P0165-17 No Permit - v1.0 (1)
Attachment 9 GWSF - Planning Approval P0165-17 Permit - v1.0 (1)
Attachment 10 Permit Approved – Owner
Attachment 11 Building Permit
Attachment 12 GWSF - VCAT Tribunal Planning Approval P0165-17 - v1.0 (1)
Attachment 13 GWSF - Lee Lease (executed) - v1.0
Attachment 14 GWSF - Welsh Lease (executed) - v1.0 (1) Attachment 16 -1.13 WIRTGEN INVEST Structure Chart June 2020
Attachment 16 -1.13 WIRTGEN INVEST Structure Chart June 2020 Attachment 17 - 2.6 GSF Pty Ltd. Financial Model 30 years, Status June 2020
Attachment 17 - 2.6 GSF Pty Ltd. Financial Model 30 years, Status June 2020
Attachment 18 -3.26 Statutory Declaration on lack of material changes
Attachment 19 -GWSF - EPC Contract Schedule 12 - Insurance - v1.0
Attachment 20 - GWSF - Insurance Signal icare NSW Workers CoC (exp 31.03.21) - v1.0
Attachment 21 - GWSF - Insurance Signal Motor Vehicle CoC (exp 31.10.20) - v1.0
Attachment 22 - GWSF - Insurance Signal Professional Indemnity CoC (exp 01.03.21) - v3.0
Attachment 23 - GWSF - Insurance Signal Public, Product & Umbrella Liability CoC (exp 31.07.20) - v1.0
Attachment 24 - GWSF - Insurance Signal Victoria WorkCover CoC (exp 30.06.21) - v1.0
Attachment 25 - Wirsol OM Capability Presentation 2020.06.08R2
Attachment 26 - Annex 1 - WEL Aus Team Bios 30052020
Attachment 33 - RE GEN0004388 - Wirsol Energy Pty Limited - Glenrowan West Solar Farm - Semi-Scheduled Generator
Attachment 28 -WIR-HS-POL-0005-V0-WHS Policy (1)
Attachment 29 -GWSF - EPC Contract Schedule 1 - Principals Reqts - v1.0 (1)
Attachment 30 - GWSF - EPC Contract Schedule 11 - EMJ Legal Opinion - v1.0
Attachment 31 – Statutory Declaration – Schedule 5

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