



**Salt Creek Wind Farm**  
**Generator Licence Application**  
**Essential Services Commission**

**17 October 2017**



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## **1 Background**

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### **1.1 This Application**

Salt Creek Wind Farm Pty Ltd (SCWFPL) is applying for a licence to generate, sell and supply energy. This application is being made as required by the *Electricity Industry Act 2000* and is in accordance with the *Guidance Notes for Applications for Electricity Licences and the Transfer of Existing Electricity Licences* as published by the Essential Services Commission.

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### **1.2 Salt Creek Wind Farm**

Salt Creek Wind Farm (SCWF) will consist of 15 Vestas wind turbines located approximately 17km north of Mortlake in Western Victoria. Financial Close has been reached, detailed design has commenced and construction has started. SCWF is wholly owned by Tilt Renewables Ltd (TRL), a New Zealand registered company. Tilt Renewables Australia Pty Ltd (TRAPL), also a wholly owned subsidiary of TRL, has been engaged by SCWF as the developer and operator of SCWF.

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## **2 Information on the applicant and nature of the application**

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### **2.1 Applicant Details**

(a) **Name**

Salt Creek Wind Farm Pty Ltd

(b) **ABN**

94 121 087 492

(c) **Registered Addresses**

PO Box 16080, Collins Street West, Melbourne Victoria 8007

Level 23, 535 Bourke Street, Melbourne Victoria 3000

(d) **Contact Person**

Sam Fyfield

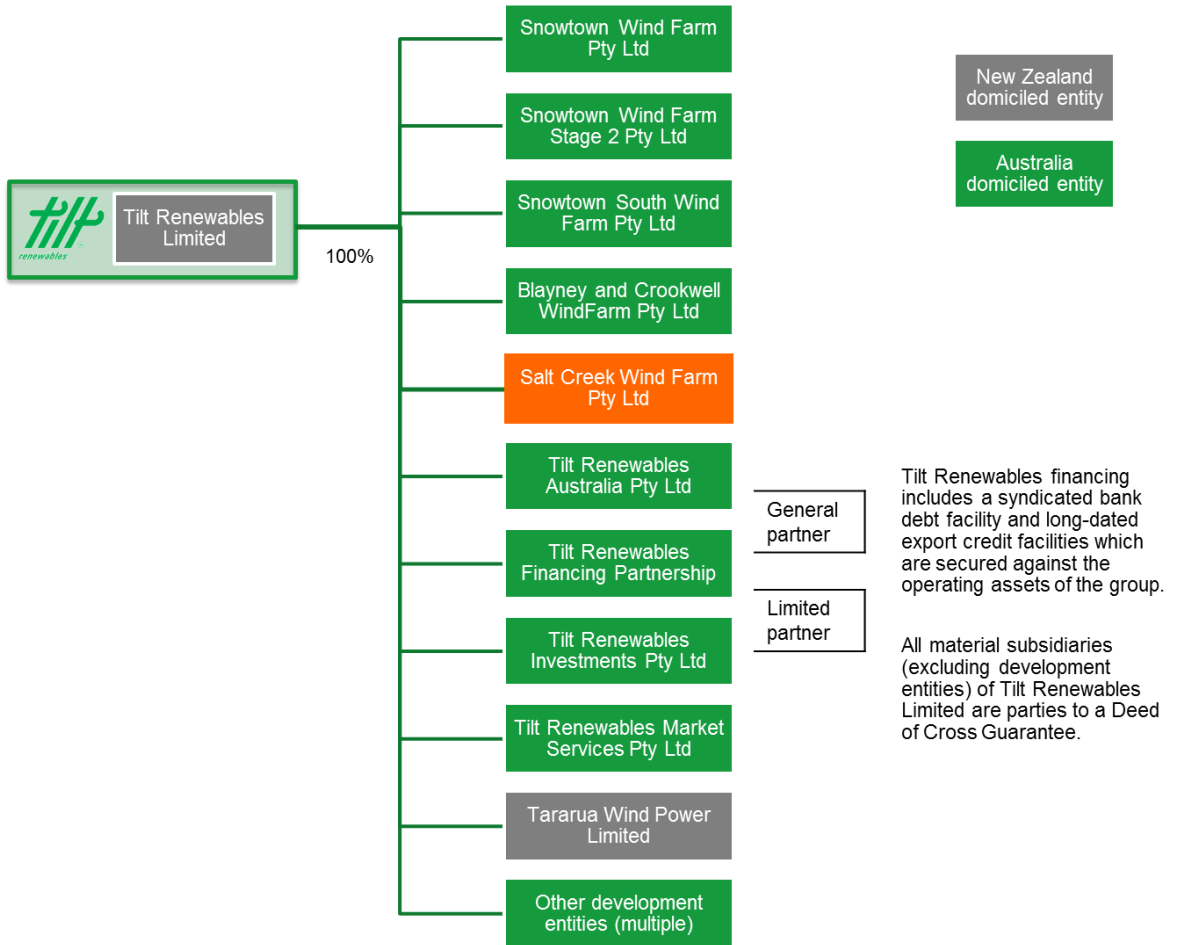
Network Connection Specialist

Tilt Renewables Australia Pty Ltd

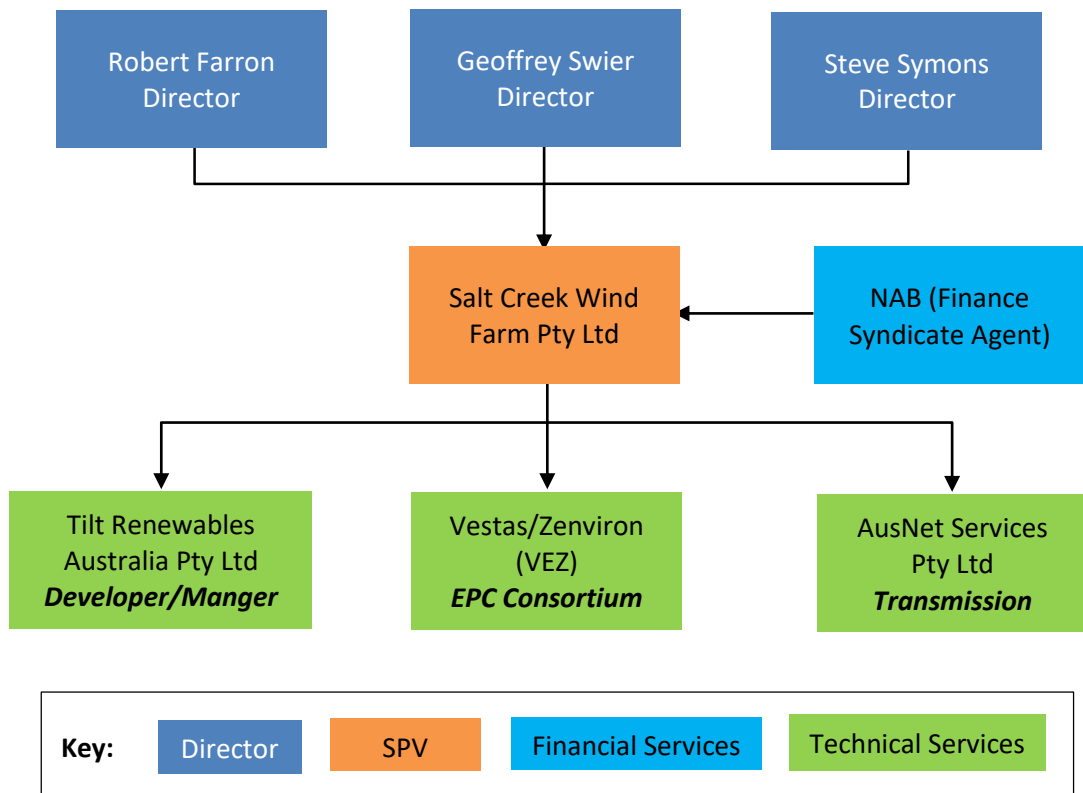
+61 427 306 938



(e) Corporate Structure

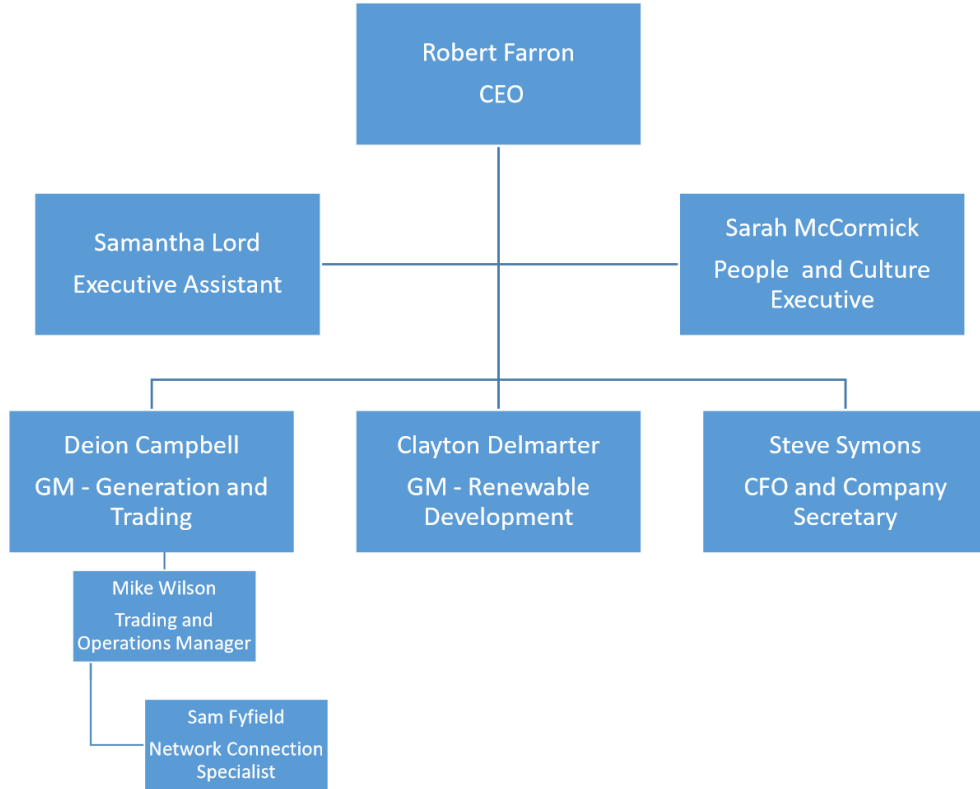


(f) Project Organisational Structure





(g) **Tilt Renewables Organisational Structure**

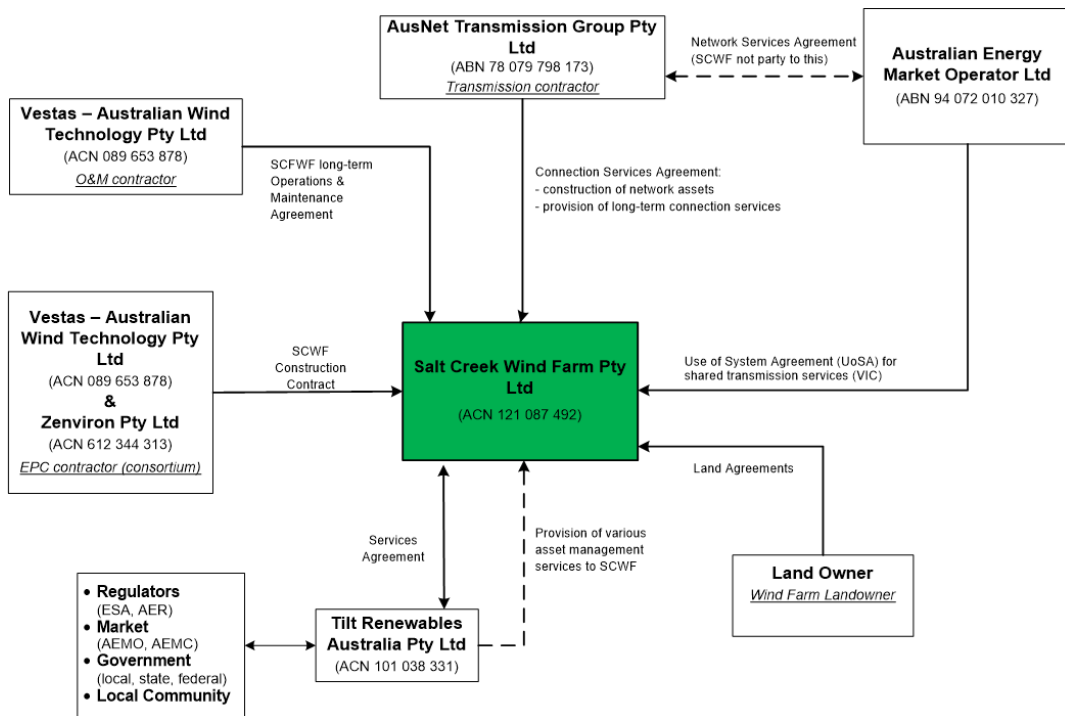


(h) **Summary of Experience of Key Personnel**

Refer to attachment **Error! Reference source not found.** for Key Personnel Experience.

(i) **Details of Contracts and Agreements for Outsourced Services**

Relevant contracts are attached as commercial-in-confidence documents in Attachments A2, A3, A4, A5, A6, A7 and A26. A diagrammatical representation of the contracting structure is shown in the following chart:



**(j) Incorporation Details**

Salt Creek Wind Farm Pty Limited (ACN 121 087 492) was registered in the state of Victoria on 4<sup>th</sup> August 2006. The original name of the entity was Newen Dundonnell Windfarm Pty Limited however the change of name to Salt Creek Wind Farm Pty Limited was registered with ASIC on 13<sup>th</sup> July 2007. Certificates of registration and name change are attached in Attachment A13.

**(k) SPV Agreements**

SCWFPL is a special purpose vehicle established for the development, construction and operations of SCWF. The Tilt Renewables group is funded through bank debt facilities (including long term export credit facilities) under a Syndicated Facility Agreement (SFA) which are secured against all operating assets and material subsidiaries within the group.

As wholly-owned subsidiary of the TRL, SCWFPL is an identified obligor and guarantor in the SFA under a Security Deed containing all material Tilt Renewables Group assets and contracts. As obligor and guarantor, SCWFPL has the benefit (and obligation) of the Tilt Renewables Group financial position. In circumstances where SCWFPL is unable to meet its obligations, it would be in the interest of the wider Tilt Renewables Group to provide SCWFPL with financial support, as cross default, administration, insolvency of SCWFPL could trigger an Event of Default under the SFA, impacting the remaining Group.

Due to this relationship with the wider Tilt Renewables Group, SCWFPL’s financial position has limited relevance in the assessment of SCWFPL’s financial strength. Management view that Tilt Renewable Limited’s financial position is a more accurate depiction of SCWFPL’s financial capabilities.



(l) **Operational Contracts and Relationships**

As shown at section 2.1(i), Salt Creek Wind Farm Pty Ltd has entered a long term Operations and Maintenance Agreement with Vestas – Australian Wind Technology Pty Ltd. That contract is attached as a commercial-in-confidence document in Attachment A7.

(m) **Details of Shareholders**

Tilt Renewables' majority shareholder, Infratil Limited (Infratil), is an ASX and NZX listed company with investments in infrastructure businesses across Australasia and the US. Although Infratil does not have a credit rating, it has a stated objective of maintaining credit metrics consistent with BBB (Investment grade) comparators and issues infrastructure bonds that are listed on the NZX. More information on Infratil can be found on their website at [www.infratil.com](http://www.infratil.com). The other substantial shareholder, Tararua Energy Consumers Trust (TECT), is a NZ trust that generates the majority of its income from long term investments in Trustpower and Tilt Renewables, and distributes funding to the community in the Tauranga and Bay of Plenty area. More information can be found on their website at [www.tect.org.nz](http://www.tect.org.nz).

(n) **Details of Prosecutions**

None to our knowledge.

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## 2.2 **Application**

(a) **Type of Licence Sought**

Electricity Generation Licence

(b) **Date from which Licence is Sought**

15 December 2017

(c) **Nature and Scope of Operations for which the Licence is Sought**

Salt Creek Wind Farm will consist of 15 turbines, each rated at 3.6MW, resulting in a nameplate rating of 54MW. The wind farm is located near Woorndoo, approximately 250km west of Melbourne, on a merino stud farm. Financial close for the project was received on June 30, 2017 and construction commenced in July 2017. The electricity generated by the wind farm will be sold into the National Electricity Market.

Financial close was reached on the basis of the Wind Farm taking the merchant risk. No power purchase agreement has been entered into and the project will take the market price for energy delivered over each market interval.

The Licence is sought to cover the operation and trading of the generator as described above.

(d) **Details of Current or Former Licences Held**

SCWFPL has never held other licences and has never applied unsuccessfully for other licences in Victoria or other jurisdictions.

Licences are held for the following Australian projects owned by associated companies under the Tilt Renewables banner:

- Snowtown Wind Farm Pty Ltd holds a licence with the Essential Services Commission of South Australia for Snowtown Stage 1 Wind Farm.
- Snowtown Wind Farm Stage 2 Pty Ltd holds a licence with the Essential Services Commission of South Australia for Snowtown Stage 2 (North) Wind Farm.
- Snowtown South Wind Farm Pty Ltd holds a licence with the Essential Services Commission of South Australia for Snowtown Stage 2 (South) Wind Farm.

Tararua Wind Power Limited owns the Tararua Wind Farms (3 stages) in New Zealand and holds appropriate licences for their operation.

(e) **Licence Conditions**

SCWFPL is not applying for non-standard licence conditions.

(f) **Experience of Key Personnel**

Refer to attachment **Error! Reference source not found.** for Key Personnel Experience.

(g) **Broad Nature of Proposed Participation in the Victorian Electricity Industry**

Salt Creek Wind Farm is proposed to supply energy to the Victorian electricity consumers. The energy will be generated from a renewable fuel source and the electricity will be traded through the National Electricity Market.

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## 3 The Commission's Objectives

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### 3.1 The Act

As stated in the Essential Services Commission Act 2001 (the Act), section 8, the Commission's objectives are:

- (1) In performing its functions and exercising its powers, the objective of the Commission is to promote the long term interests of Victorian consumers.
- (2) Without derogating from subsection (1), in performing its functions and exercising its powers in relation to essential services, the Commission must in seeking to achieve the objective specified in subsection (1) have regard to the price, quality and reliability of essential services.

### 3.2 Promotion of the Long Term Interests of Victorian Consumers

The applicant believes that the granting of this licence is consistent with the Commission's objective relating to section 8(1) of the Act. Salt Creek Wind Farm is a financially viable generator, developed and owned by an experienced parent company. The supply contract and long-term operations and maintenance agreements are with major industry organisations ensuring long-term certainty and control of the projects costs. The energy generation and price modelling performed for the project forecast sufficient income to ensure the project will meet its licence obligations whilst providing cost competitive energy to the Victorian consumer. The low environmental impact of the generator will ensure that Victorians continue to have access to energy whilst minimising the negative effects of producing that energy.

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### **3.3 Price**

The inclusion of the generator in the National Electricity Market will increase the competition in Victoria. The increased competition, particularly from a generator with low operating costs, is expected to keep downward pressure on the wholesale power price in Victoria. It will also increase the number of Large Scale Renewable Energy Certificates (LRECs) in circulation putting downwards pressure on the LREC market. Victorian consumers are also exposed to the LREC market so such price pressure will continue to ensure Victorians receive the best price for the renewable certificates.

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### **3.4 Quality and Reliability**

The generator will comply with the requirements of the Generator Performance Standards agreed with AEMO to ensure that the quality and reliability of the essential service it provides aligns with industry best practice.

The inclusion of additional generation in Victoria increases the overall energy supply reliability through the diversification of both fuel source and location of the sources of energy supply.

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### **3.5 Efficiency Within the Industry and Incentives for Long Term Investment**

The parent company has a history of developing and constructing projects that it continues to own for the long term. Tilt Renewables Limited takes a long term view in respect of its investments. The long term focus of the parent company and the project supports the Commissions objective of seeking long term efficiency within the industry.

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### **3.6 Financial Viability of the Industry**

The supply contract and long-term operations and maintenance agreements are with major industry organisations ensuring long-term certainty and control of the projects costs. The energy generation and price modelling performed for the project forecast sufficient income to ensure the project will meet its licence obligations whilst providing cost competitive energy to the Victorian consumer into the long term. The project's economic viability supports the Commissions objective of ensuring the financial viability of the industry.

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### **3.7 Degree of Competition within the Industry, Including Countervailing Market Power and Information Asymmetries**

Salt Creek Wind Farm is the first project to be owned and constructed by the parent company in Victoria. The introduction of a new electricity generation company into Victoria increases competition in the industry supporting the Commission's objective.

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### **3.8 Relevant Health, Safety, Environmental and Social Legislation Applying to the Industry**

The construction and operations of the project will be in accordance with all relevant health, safety, environment and social legislation ensuring the project meets the Commission's objective.

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### **3.9 Benefits and Costs of Regulation for Consumers and Users (including Low Income and Vulnerable Consumers) and Regulated Entities.**

The project will comply with its regulated requirements and will work with associated regulated bodies to ensure it does not cause them to breach regulations. This will ensure that the project meets the Commission's objective and supports others to do so also.

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### **3.10 Consistency in Regulation Between States and on a National Basis**

The project has followed processes to ensure it meets the requirement of Victorian regulatory bodies. The project would have been successful in demonstrating regulatory compliance (with some regional variations) in other jurisdictions. The project believes the Commission would be acting consistently with other jurisdictions in granting the licence to the Salt Creek Wind Farm Pty Ltd.

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### **3.11 Matters Specified in the Empower Instrument**

The Empowering Instrument for the Act is the Electricity Industry Act 2000 (the EI Act). Section 10 of the EI Act state the Objectives of the Commission to be:

- (a) To the extent that it is efficient and practicable to do so, to promote a consistent regulatory approach between the electricity industry and the gas industry; and
- (b) To promote the development of full retail competition; and
- (c) To promote protections for customers, including in relation to assisting customers who are facing payment difficulties.

The granting of the licence for the project is consistent with the equivalent process in the gas industry.

The proponent notes that competition in the wholesale generation market allows retailers a wider choice of energy suppliers, facilitating full retail competition.

The proponent and the project are at arm's length from the consumer so customer protections are not relevant for this licence applications.

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## **4 Information on Financial Viability**

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### **4.1 Statement of Financial Viability**

SCWFPL is a wholly owned subsidiary of Tilt Renewables Limited (TRL), a NZX/ASX listed business with a portfolio of operating renewable energy assets generating in excess of A\$170M revenue per annum. Due to the corporate debt financing arrangements in place, outlined in section 2.1(k), Management view that Tilt Renewable Limited's financial position is a more accurate depiction of SCWFPL's financial capabilities. SCWFPL is also a party to a Deed of Cross-Guarantee, the obligations of SCWFPL are required to be met by the other parties in the event of liquidation of SCWFPL.

SCWFPL has access to sufficient financial resources to sustain a viable business in the electricity industry.

For the 12 months ending 31 March 2017 and going forward, entity level accounts are no longer required to be produced as SCWFPL is a 100% owned subsidiary of TRL and is party to a deed of cross guarantee. The 2017 group accounts for TRL (and subsidiaries) are available on Tilt Renewables' website:

[http://tiltrenewables.com/s/Tilt-Renewables-Annual-Report-2017\\_Web\\_Spreads.pdf](http://tiltrenewables.com/s/Tilt-Renewables-Annual-Report-2017_Web_Spreads.pdf)

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#### **4.2 Current balance sheet and financial data**

SCWFPL is a legal entity created for the construction of the wind farm. Currently there are a minimal number of transactions recorded within SCWFPL as all SCWF work in progress construction costs have currently been recorded within Tilt Renewables Australia Pty Ltd, another subsidiary legal entity within the Tilt Renewables Ltd group.

Balance sheet and financial data for TRL (the ultimate holding company of the group) have been included as part of this application per section 4.1.

Financial forecast information for SCWF are also provided in the Business Plan, included as commercial-in-confidence attachment A12.

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#### **4.3 Significant contracts**

As part of the financial close for the project SCWFPL executed a number of contracts and associated deeds, guarantees. The following key contracts for the construction and operations of the wind farm are provided as commercial-in-confidence:

- Use of System Agreement with AEMO (commercial-in-confidence attachment A5)
- Engineer, Procure and Construct Contract with Vestas/Zenvion consortium (commercial-in-confidence attachment A3)
- Warranty Operation & Maintenance Contract with Vestas (commercial-in-confidence attachment A7)
- Connection Services Agreement with AusNet Services (commercial-in-confidence attachment A4)

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#### **4.4 Annual report**

As of 30 June 2017, SCWFPL had entered into a Deed of Cross Guarantee with Tilt Renewables Limited which removes the requirement for the preparation of separate financial statements. It is therefore recommended that the Commission refers to the 2017 Annual Report for Tilt Renewables Limited which is available on the Tilt Renewables website at [http://tiltrenewables.com/s/Tilt-Renewables-Annual-Report-2017\\_Web\\_Spreads.pdf](http://tiltrenewables.com/s/Tilt-Renewables-Annual-Report-2017_Web_Spreads.pdf)

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#### **4.5 Credit rating**

Neither SCWFPL nor its parent, Tilt Renewables Limited, has a public credit rating.

#### 4.6 Statements from internal/external auditors

As a wholly-owned subsidiary of TRL, the financials of SCWFPL are included in the scope of half year review (30 September) and the year-end audit (31 March), both to be performed by PricewaterhouseCoopers.

The first reporting period where SCWFPL will have material work in progress or asset balances will be at the half year period ended 30 September 2017. Half year reporting will be released publicly at the end of October.

#### 4.7 Statements from consultants

As part of the due diligence undertaken for the financial investment decision, the following technical consultant reports were prepared:

- Wind energy assessment for Salt Creek Wind Farm prepared by DNV GL (commercial-in-confidence attachment 23)
- Marginal Loss Factor Assessment prepared by EY (commercial-in-confidence attachment 24)
- Power system studies report prepared by AECOM/FCPS (commercial-in-confidence attachment 25)

#### 4.8 Statement of assets and liabilities

SCWFPL is a legal entity created for the construction of the wind farm. Currently there are a minimal number of transactions recorded within SCWFPL as all SCWF work in progress construction costs have currently been recorded within Tilt Renewables Australia Pty Ltd, another subsidiary legal entity within the Tilt Renewables Ltd group.

Balance sheet and financial data for Tilt Renewables Ltd (the ultimate holding company of the group) have been included as part of this application per section 4.1.

#### 4.9 Shareholder register

SCWFPL is 100% owned by TRL which is listed on the ASX/NZX. The significant shareholders of TRL, being Infratil Limited and TECT, are summarised in section 2.1(m).

A full breakdown of top 20 shareholder of TRL is shown below:

Top 20 shareholders as at 3 May 2017	Holding	Percentage
INFRATIL LIMITED	159,742,389	51.0
TECT HOLDINGS LIMITED	83,878,838	26.8
HSBC NOMINEES A/C NZ SUPERANNUATION FUND NOMINEES LIMITED - NZCSD	4,994,955	1.6
ACCIDENT COMPENSATION CORPORATION - NZCSD	3,751,968	1.2
CUSTODIAL SERVICES LIMITED <A/C 3>	2,650,417	0.8
TEA CUSTODIANS LIMITED CLIENT PROPERTY TRUST ACCOUNT - NZCSD	2,601,591	0.8
NEW ZEALAND PERMANENT TRUSTEES LIMITED - NZCSD	2,480,001	0.8
CUSTODIAL SERVICES LIMITED <A/C 1>	2,164,352	0.7
NATIONAL NOMINEES NEW ZEALAND LIMITED - NZCSD	1,962,025	0.6
FORSYTH BARR CUSTODIANS LIMITED	1,756,857	0.6



BNP PARIBAS NOMINEES (NZ) LIMITED - NZCSD <COGN40>	1,715,891	0.5
BNP PARIBAS NOMINEES (NZ) LIMITED - NZCSD <BPSS40>	1,154,682	0.4
CUSTODIAL SERVICES LIMITED <A/C 4>	1,089,404	0.3
CITIBANK NOMINEES (NEW ZEALAND) LIMITED - NZCSD	1,020,735	0.3
CUSTODIAL SERVICES LIMITED <A/C 2>	978,527	0.3
JBWERE (NZ) NOMINEES LIMITED	948,814	0.3
JPMORGAN CHASE BANK NA NZ BRANCH-SEGREGATED CLIENTS ACCT - NZCSD	879,581	0.3
CUSTODIAL SERVICES LIMITED <A/C 18>	805,683	0.3
GUARDIAN NOMINEES NO 2 A/C WESTPAC W/S ENHANCED CASH TRUST - NZCSD	749,420	0.2
FNZ CUSTODIANS LIMITED	680,507	0.2
Top 20 shareholders	276,006,637	88.2

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#### **4.10 Certificate of registration**

Salt Creek Wind Farm Pty Ltd was registered in Victoria as a company on 4 August 2006. ACN registration number is 121 087 492 as outlined in section 2.1(j). The certificate of registration is provided in Attachment A13.

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#### **4.11 Statements from banks and Tilt Renewables Limited Board**

SCWF finalised debt and equity arrangements for the construction funding for the Wind Farm upon financial close on 30 June 2017.

Documents detailing these debt arrangements are provided in commercial-in-confidence attachments A8, A9 and A10. The SCWF Financial Investment Decision was approved by the Tilt Renewables Board and key contracts signed by the SCWFPL Board on 29 June 2017. A copy of the NZX/ASX announcement confirming the Financial Investment Decision for SCWF released on 30 June 2017 is included in Attachment A15.

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#### **4.12 Guarantees**

SCWF has put in place bank guarantee facilities with commercial lenders to provide necessary security for the construction of the Wind Farm and associated connection infrastructure. The EPC consortium and O&M provided also provided some guarantees to SCWF. Details of these guarantees are provided in commercial-in-confidence attachment A11.

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#### **4.13 Australian Financial Services Licence**

SCWF intends to sell its electricity into the National Electricity Market, however the Wind Farm may in the future look to enter into financial contracts for part or all of the electricity and large-scale generation certificates produced from the facility. For any contracts that require an Australian Financial Services Licence, SCWF will procure services from Tilt Australian Market Services Limited (AFSL number 419007).

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#### **4.14 Assurance of sufficient financial resources**

SCWF assures the commission that it has sufficient financial resources to sustain its operations including meeting all prudential requirements set by AEMO and/or transmission network service operators and ESC licence conditions.

In addition to the statements made above regarding the financial position of TRL and its subsidiaries, a business plan and accompanying financial model are attached in commercial-in-confidence attachments A12 and A14 respectively to support the applicant's assurance.

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#### **4.15 Corporate governance**

TRL has a number of internal controls, policies and procedures in place including:

- Risk management policies
- Governance policies
- Complaints register and procedures
- Privacy statements
- Document retention policies

Key governance documents can be found on the Tilt Renewables website at <http://tiltrenewables.com/governance/>

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#### **4.16 Credit support arrangements**

SCWF has executed a Connection Services Agreement with AusNet Transmission Group Pty Ltd (ABN 78 079 798 173) and has arranged the necessary credit support facilities for both the construction and operation of the Wind Farm connection.

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#### **4.17 Business Plan**

The financial viability for the underlying investment in SCWF is supported by the Business Plan attached in commercial-in-confidence attachment A12.

The financial model supporting the forecasts included in the Business Plan is included in commercial-in-confidence attachment A14.

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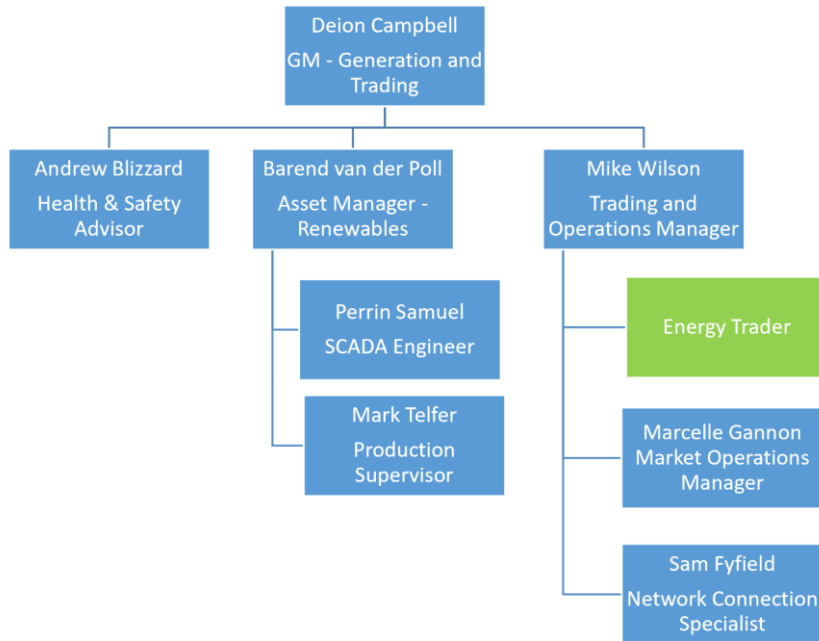
## **5 Information on technical capacity**

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### **5.1 General**

#### **(a) Organisational chart of key personnel**

An organisational chart showing the business capability is included in section 2.1(g). The operational and technical capability is demonstrated in the following organisational chart. A summary of the experience of the key personnel is included in commercial-in-confidence attachment A1.



**(b) Contracts with external service providers**

Section 2.1(i) details the contracts and agreements for outsourced services

**(c) Statements from industry bodies and regulators**

This project has received all required planning permits and environmental approvals from the relevant regulators to construct the generator. Refer to section 5.2(f) for the details on those statements of approval.

**(d) Internal controls, policies and procedures**

Section 4.15 discusses policies and procedures guiding the operation of Tilt Renewables Limited. Salt Creek Wind Farm will be operated in accordance with those controls, policies and procedures. The following are additional internal policies that are relevant to the technical capacity:

- Health and Safety Policy (commercial-in-confidence attachment A16)
- Issue Resolution Policy (commercial-in-confidence attachment A17)
- Lone Work Policy (commercial-in-confidence attachment A18)
- Fitness for Work Policy (commercial-in-confidence attachment A19)
- Drug Alcohol and Impairment in the Workplace Policy (commercial-in-confidence attachment A20)

**(e) Business model/plans**

The business plan is included as commercial-in-confidence attachment A12.

**(f) Risk management policies**

SCWF will operate based on TRL's risk management policies. The Risk Management Policy is included as commercial-in-confidence attachment A21.

**(g) Governance Policies**

Governance policies are discussed in section 4.15.

**(h) References for key personnel**

References for key personnel can be found in commercial-in-confidence attachment A1.

**(i) Australian Financial Services Licence**

Arrangements for an AFSL is discussed in section 4.13.

**(j) Complaints register and procedures**

The Complaints Procedures are publically available at the following website.

<http://tiltrenewables.com/governance/>

**(k) Privacy statements**

Salt Creek Wind Farm Pty Ltd does not have direct contact or billing interactions with consumers in Victoria. Privacy and confidentiality arrangements with other parties with which SCWFPL interacts are incorporated into the commercial agreements defining those interactions.

SCWFPL will comply with all relevant requirements under the *Privacy Act 1988*.

**(l) Document retention policies**

SCWFPL retains documents in its document management system for durations that meet or exceed the statutory retention periods.

**(m) Industry submissions supporting the application**

The project is now fully funded and in construction so additional support for the project is not required.

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## **5.2 Information in support of a generation licence application**

**(a) Details of experience in and knowledge of the electricity industry**

SCWFPL has a services agreement between itself and Tilt Renewables Australia Pty Ltd (TRAPL) such that TRAPL provides experience and knowledge of the electricity industry to SCWFPL. Tilt Renewables owns and operates a wind generation portfolio with an installed capacity of 582MW, representing approximately 11% of market share by installed wind capacity in Australasia. Installed capacity is made up of 307 operating turbines across 7 wind farms and includes both Australia's second largest, and New Zealand's largest wind farms. Tilt Renewables has significant, on-going participation in the electricity industry and will lend that experience to Salt Creek Wind Farm.

**(b) A summary of the skills and experience of the directors and senior managers and their relevance to meeting the requirements of the licence**

Sections 2.1(g) and 2.1(h) show the Tilt Renewables organisational structure and a summary of the key personnel's experience. The senior management team of Tilt Renewables has proven capability and a focus on renewable energy generation. The team has relevant

experience in the development, construction and operations of generation plant that will be applied to the Salt Creek Wind Farm project.

(c) **Evidence that the applicant has the capacity to comply with the licence conditions, codes and guidelines relevant to its application**

The Key Personnel Experience detailed in commercial-in-confidence attachment A1 shows the relevance and breadth of experience of the team responsible for Salt Creek Wind Farm. Salt Creek Wind Farm has access to resources to ensure it complies with the licence conditions, codes and guidelines relevant to this application.

(d) **Evidence of any interactions or preliminary registration with AEMO**

Salt Creek Wind Farm Pty Ltd is registered as an Intending Participant with AEMO. The registration document is included in commercial-in-confidence attachment A22. Additionally, a Use of System Agreement has been agreed with AEMO and is included in commercial-in-confidence attachment A5.

(e) **Relationships between supporting organisations**

Section 2.1(i) shows the contractual relationships between the supporting organisations and Salt Creek Wind Farm Pty Ltd. Additionally, section 2.1(k) describes the SPV arrangement between Tilt Renewables and SCWFPL. Section 2.1(l) describes the operational arrangements for Salt Creek Wind Farm.

(f) **Confirmation that all planning and environmental approvals have been completed**

Moyne Shire issued Planning Permit N. PL06/304.01 on 29 February 2016. A Self Assessment of the wind farm under the EPBC Act determined that the proposed works will not have a significant impact on Matters of National Environmental Significance so the project did not need a referral to the Commonwealth Minister for the Environment under the EPBC Act. The transmission line connecting the wind farm to the existing transmission network did require a referral and the Referral Decision (13 September 2016) was that the transmission line construction was not a controlled action.

The current permits for both SCWF and the transmission line require a number of management plans and secondary consent documents to be prepared for endorsement by Council prior to the commencement of construction.

All management plans and secondary consent documents required by the wind farm planning permit were endorsed by Moyne Shire Council on 23 June 2017.

The transmission line permit to remove native vegetation and the Flora and Fauna Guarantee (FFG) Act permit both require the preparation and endorsement of a Construction Environmental Management Plan (CEMP) prior to construction. The CEMP has been reviewed and has been endorsed by the Department of Environment, Land Water and Planning (DELWP) on 22 September 2017. AusNet Services has made all changes requested by DELWP to ensure it complies with the department's requirements.

All necessary environmental approvals for the SCWF have been obtained. This includes required approvals for the wind farm and the transmission infrastructure.

(g) **Risk, governance and compliance management and strategies**

Tilt Renewables has a number of public policies and procedures in place including:

- Risk management policies
- Governance policies
- Complaints register and procedures
- Privacy statements
- Document retention policies

Key governance documents can be found on the Tilt Renewables website at <http://tiltrenewables.com/governance/>.

**(h) Evidence that demonstrates that the entity can successfully operate a business within the electricity industry**

Tilt Renewables as the owner of Salt Creek Wind Farm have solid track records of successfully operating businesses within the electricity industry. Tilt Renewables holds an 11% share of the installed wind capacity in Australasia. The annual report (refer to section 4.4) and auditors' statements (section 4.6) provide evidence of this success.

**(i) Confirmation that there are no cross ownership issues arising under the provisions of Part 3 of the EI Act – Cross Ownership**

Salt Creek Wind Farm Pty Ltd understands that the relevant sections of the EI Act (24, 32 and 33) have been repealed.

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## 6 List of Attachments

The attachments listed below marked as commercial-in-confidence are not to be released to the public. That information is commercially sensitive and/or confidential and its release would be injurious to the project, Salt Creek Wind Farm Pty Ltd and other involved parties.

The Essential Services Commission is not to release these documents to third parties without the prior written consent of Salt Creek Wind Farm Pty Ltd.

- A1 Experience of Key Personnel (commercial-in-confidence)
- A2 Services Agreement (commercial-in-confidence)
- A3 SCWF Construction Contract (commercial-in-confidence)
- A4 Connection Services Agreement (commercial-in-confidence)
- A5 Use of System Agreement (commercial-in-confidence)
- A6 Land Agreements (commercial-in-confidence)
- A7 Operations & Maintenance Agreement (commercial-in-confidence)
- A8 Debt Facility - Common Terms Deed Poll (commercial-in-confidence)
- A9 Debt Facility - Agreement (commercial-in-confidence)
- A10 Debt Facility – Drawdown Notice (commercial-in-confidence)
- A11 SCWF bank guarantee facility (commercial-in-confidence)
- A12 Salt Creek Wind Farm Pty Ltd Business Plan (commercial-in-confidence)



- A13 Certificate of Registration on Change of Name
- A14 Salt Creek Wind Farm Financial Model (commercial-in-confidence)
- A15 NZX and ASX Announcement – Salt Creek Wind Farm
- A16 Health and Safety Policy (commercial-in-confidence)
- A17 Issue Resolution Policy (commercial-in-confidence)
- A18 Lone Work Policy (commercial-in-confidence)
- A19 Fitness for Work Policy (commercial-in-confidence)
- A20 Drug Alcohol and Impairment in the Workplace Policy (commercial-in-confidence)
- A21 Risk Management Policy (commercial-in-confidence)
- A22 Intending Participant Registration (commercial-in-confidence)
- A23 Wind Energy Assessment (commercial-in-confidence)
- A24 Marginal Loss Factor Assessment (commercial-in-confidence)
- A25 Power System Studies (commercial-in-confidence)
- A26 Variation to Land Agreement (commercial-in-confidence)