

**"FOR PUBLICATION"
COPY**

**APPLICATION FORM FOR
THE ISSUE OF AN
ELECTRICITY
TRANSMISSION OR
DISTRIBUTION LICENCE
BY THE
ESSENTIAL SERVICES
COMMISSION OF SA
UNDER THE *ELECTRICITY
ACT 1996***

August 2011

ELECTRICITY

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INFORMATION FOR APPLICANTS BEFORE FILLING OUT THIS FORM

Purpose of this form

This form is to be completed by persons making application to the Essential Services Commission of South Australia (the Commission) for the issue of a licence to authorise electricity retail operations in the electricity supply industry in South Australia.

The Commission can also consider joint applications from two or more persons who wish to hold a licence jointly. Persons making joint applications must ensure that each of the applicants completes a separate application form, together with a covering letter explaining that the application is for a licence to be jointly held.

Basis for this form

Section 16(1)(a) of the *Electricity Act 1996* (the Act) provides that an application for the issue of a licence must be made to the Commission in a form approved by the Commission. This is the form approved by the Commission.

Use of this form and Applicant's Responsibilities

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

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

Applicants should list the information requested in the spaces provided in this form and enclose additional information when required. Applicants must take all reasonable steps to ensure the information provided in the application form is complete, true and correct and are required to make a declaration to that effect in the application form. Failure to disclose information or misrepresent any matter relevant to such information may result in a licence not being issued or in the suspension or cancellation of a licence at a later time.

Applicants are responsible for providing the Commission with current, accurate and relevant documentation. This will ensure that the application is processed promptly and without delay. All applications are assessed on a case-by-case basis. If insufficient information is provided with an application, the Commission will request additional information to be submitted before the application is considered further.

Prior reading

It is essential that licence applicants read the Commission's Advisory Bulletin No 4 – "*Licensing Arrangements for the Electricity and Gas Supply Industries*" before they fill out this form. Bulletin No. 4 is available on the Commission's website www.escosa.sa.gov.au under electricity/licensing.

Application fees and annual licence fees application

Applicants should also enclose the application fee (presently set by the Minister for Energy at \$1,000 per licence) with their application.

Holding a licence incurs annual licence fees. The licence fees determined by the Minister for Energy are administered by the Commission. At annual intervals, the Commission, on behalf of the Minister, will send to each licensee, depending on the category within the sector, an invoice for the licence fee. Licence fees are to be paid on receipt of an invoice via one of the payment options set out in the invoice.

The initial licence will not be issued until the first annual licence fee (or approved licence fee instalment) has been paid.



LICENCE APPLICATION FORM

1. THE APPLICANT

Applicants must answer all questions in this section.

1.1 Identity of Applicant

State the full name of the applicant. The applicant is the person who will be undertaking the electricity transmission or distribution operations that will be the subject of the licence. Joint applicants should each complete an application form, and submit their application forms at the same time, with a covering letter explaining that a joint application is being made.

Name: EN Project Company One Pty Ltd (ACN 618 387 143) as trustee for EN Project Trust One (ABN 16 785 837 441)
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1.2 Legal Identity of Applicant

Provide information about the applicant, (i.e. whether the applicant is a natural person, private limited company or partnership, etc). If the applicant is a body corporate, please also state the jurisdiction in which the applicant is registered, and the applicant's ABN/ACN.

The Applicant is EN Project Company One Pty Ltd (ACN 618 387 143) as trustee for EN Project Trust One (ABN 16 785 837 441) (EN Trust)
EN Trust is registered in Queensland and is a wholly-owned subsidiary of ReNu Energy Limited (ACN 095 006 090) (ReNu Energy), a publicly listed company on the Australian Securities Exchange (ASX), with its head office in Brisbane, Queensland. ReNu Energy is the ultimate holding company of the ReNu group of companies (ReNu Group).

1.3 Address and Contact Details of Applicant

Business Address: Level 1, 9 Gardner Close, MILTON.....	
State: Queensland.....	Post Code: 4064.....
Postal Address (if different to Business Address):	
PO Box 2046, MILTON.....	
State: Queensland.....	Post Code: 4064.....
Telephone: 07 3721 7500.....	Facsimile: 07 3721 7599.....
E-mail: info@renuenergy.com.au.....	



1.4 Contact Person on behalf of Applicant

The full name, title and contact details of a person to whom the Commission can direct enquiries and correspondence about the application.

Full Name: Damian Galvin	
Title: CFO & Company Secretary	
Business Address: Level 1, 9 Gardner Close, MILTON	
State: Queensland	Post Code: 4064
Postal Address (if different to Business Address):	
PO Box 2046, MILTON	
State: Queensland	Post Code: 4064
Telephone: 07 3721 7500	Facsimile: 07 3721 7599
E-mail: company.secretary@renuenergy.com.au	

1.5 Contact Person for Licence Fees

The full name and/or title of the person to whom the Commission can direct enquiries and correspondence about licence fees.

Full Name: Damian Galvin	
Title: CFO & Company Secretary	
Business Address: Level 1, 9 Gardner Close, MILTON	
State: Queensland	Post Code: 4064
Postal Address (if different to Business Address):	
PO Box 2046, MILTON	
State: Queensland	Post Code: 4064
Telephone: 07 3721 7500	Facsimile: 07 3721 7599
E-mail: company.secretary@renuenergy.com.au	

1.6 Diagram of Corporate or other Structure

Please attach with this application form details of the corporate or other structure, including details of any related companies within the meaning of the Corporations Act 2001; and a diagram of the organisational chart, including composition of the board, management and other key personnel responsible for the key functions of the business.

PLEASE NOTE: ALL DOCUMENTS ATTACHED TO THIS APPLICATION ARE CONFIDENTIAL AND MUST NOT BE PUBLISHED WITHOUT A WRITTEN CONSENT FROM RENU ENERGY LIMITED.

1.6.1 Corporate structure

The ReNu Group structure diagram (refer to **Appendix A-1**) shows the ownership structure of controlled entities under the ReNu Group of companies, including but not limited to, the EN Trust.

1.6.2 Organisational structure

The organisational chart (refer to **Appendix A-2**) provides an overview of the ReNu Group's organisational structure which supports the operations of the EN Trust (further discussed below in section 3.5).



2 THE LICENCE

Applicants must answer all questions in this section.

2.1 Type of Licence sought

State the type of licence sought by the applicant, e.g. transmission or distribution.

Distribution

2.2 Date from which Licence is sought

If the applicant seeks to have the licence issued by a certain date, provide this date. Please note that the Commission does not undertake to issue the licence by this date. Applicants should usually allow the Commission a minimum of eight weeks to consider an application, as a public consultation period of several weeks forms part of the Commission's consideration of licence applications.

1 May 2018.

2.3 Nature and scope of operations for which Licence is sought

Applicants for such licences must state the location of the network, the voltage of the network and the rated capacity of the network (MW and MVA). Applicants should attach a map showing the proposed route of the network.

Murray Bridge Marketplace Project

The first solar generation plant will be located at Murray Bridge Marketplace shopping centre, 21-53 South Terrace, Murray Bridge SA 5253. The solar photovoltaic (**PV**) system will consist of 981.92kW DC of solar panels connected to 950kW of inverters (combined AC nameplate rating). The electricity generated will be primarily consumed on the premises by embedded network customers and connected to the distribution network via two existing dedicated 11/0.4kV 2,000kVA pad-mounted transformers (TC41232 and TC41233).

The operating philosophy of the generation will be that under normal network conditions:

- Generated power from the solar PV system will contribute towards the supply of the energy requirements of Murray Bridge Marketplace, and
- The solar PV system will export to the Network any power generated which is surplus to Murray Bridge Marketplace's internal demand.

(Refer **Appendix J-1** – Murray Bridge SLD)

Mt Gambier Marketplace Project

The second solar generation plant will be located at Mt Gambier Marketplace shopping centre, 182-202 Penola Road, Mt Gambier SA 5290. The solar PV system will consist of 638.97kW DC of solar panels connected to 600kW of inverters (combined AC nameplate rating). The electricity generated will be primarily consumed on the premises by embedded network customers and connected to the distribution network via two existing dedicated 11/0.4kV 1,500kVA pad-mounted transformers (TC54556 and TC54555).

The operating philosophy of the generation will be that under normal network conditions:

- Generated power from the solar PV system will contribute towards the supply of the energy requirements of Mt Gambier Marketplace, and
- The solar PV system will export to the Network any power generated which is surplus to Mt Gambier Marketplace's internal demand.

(Refer **Appendix J-2** – Mt Gambier SLD)

Also attached (Refer **Appendix J-3**) is an example of a typical ReNu Energy Solar PV Embedded Network



3 SUITABILITY OF APPLICANT TO HOLD A LICENCE

Applicants must answer all questions in this section.

3.1 Standard of honesty and integrity shown by Applicant

In deciding whether the applicant is a suitable person to hold a licence, the Commission may:

- ▲ consider the applicant's previous commercial and other dealings, and
- ▲ the standard of honesty and integrity shown in those dealings.

Please provide information that will assist the Commission in its consideration of this matter. If the applicant:

- ▲ has been found guilty of any criminal offence,
- ▲ has been successfully prosecuted under any Territory, State or Commonwealth legislation (such as the Australian Securities and Investments Commission Act 2001 or the Competition and Consumer Act 2010), or
- ▲ has been the subject of disciplinary action,
- ▲ has been the subject of any past or present administrative or legal actions in relation to an authorisation, authority, or licence in any industry,

details of such matters must be disclosed. Failure to disclose such information or misrepresent any matter relevant to such information may result in the cancellation of a licence.

The Commission may use the service of an external expert to assist with the assessment of the applicant's standard of honesty and integrity.

EN Trust has not been prosecuted, found guilty of any criminal offence or been the subject of disciplinary, administrative or legal action in relation to an authorisation, authority, or licence.

ReNu Energy, the parent entity of EN Trust and ultimate holding company in the ReNu Group, has not been prosecuted, found guilty of any criminal offence or been the subject of disciplinary, administrative or legal action in relation to an authorisation, authority, or licence.

EN Trust and ReNu Energy have not committed any offences against, or been prosecuted under any Territory, State or Commonwealth legislation in Australia.

3.2 Standard of honesty and integrity shown by Officers and major shareholders of Applicant

Applicants should address responses to this question in the same manner as 3.1 above except here it relates to officers and major shareholders of the applicant.

Please also supply details of any policies and procedures addressing the probity and competence of officers and other key management staff.

The officers listed in Section 3.3 hereunder have not been prosecuted, found guilty of any criminal offence or been the subject of disciplinary, administrative or legal action in relation to an authorisation, authority, or licence. None of the officers listed have engaged in any prior misconduct or experienced refusal or suspension from licensing or professional membership.

None of the ReNu Group directors or officers have been disqualified from managing a corporation under the Corporations Act 2001 (Cth). None of the officers listed have an actual or potential conflict of interest likely to affect their ability to carry out their role.

The ReNu Group complies with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations. As such, the ReNu Group maintains a comprehensive set of policies and procedures addressing the probity and competence of officers and other key management staff. A separate Audit and Risk Committee oversees the ReNu Group's governance, compliance and risk matters.

The ReNu Group's relevant governance documents are outlined in the appendices as follows:

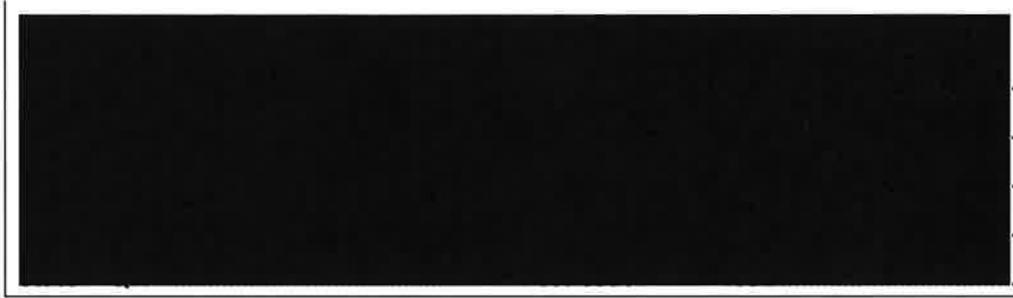
- **Appendix B-1** – Directors Code of Conduct
- **Appendix B-2** – Corporate Governance Statement
- **Appendix B-3** – Board Charter
- **Appendix B-4** – Audit & Risk Charter
- **Appendix B-5** – Business Integrity Policy

3.3 Names and addresses of the Officers of Applicant

State the names and addresses of the officers of the applicant. "Officers" of the applicant include the applicant's directors and secretary, and other persons who make or participate in making decisions that affect a substantial part of the business of the applicant.

DETAILS OF THE BELOW NAMED OFFICERS ARE CONFIDENTIAL AND NOT TO BE INCLUDED IN THE PUBLIC RELEASE.





(attach additional pages if necessary)

3.4 Names and addresses of major shareholders of Applicant

State the full names and addresses of the major shareholders of the applicant.

Sole Unitholder in the EN Trust:	
Name:	RE Holding Company Two Pty Ltd atf RE Holding Trust Two
Date of Birth (if applicable):.....	Office Held (if applicable):.....
Address: Level 1, 9 Gardner Close, Milton.....	
.....	
State: QLD.....	Post Code: 4064
Ultimate Parent Company of EN Trust:	
Name:	ReNu Energy Limited
Date of Birth (if applicable):.....	Office Held (if applicable):.....
Address: Level 1, 9 Gardner Close, Milton.....	
.....	
State: QLD.....	Post Code: 4064

3.5 Details of the group members

This is information about entities controlled by the applicant, or by the ultimate parent entity of the applicant (if applicable).

EN Trust is a wholly owned subsidiary of ReNu Energy Limited ACN 095 006 090, a company listed on the ASX (refer Appendix A-1 for the ReNu Group structure diagram). Further information regarding ReNu Energy and its corporate structure and governance is available at its website at http://www.renuenergy.com.au

3.6 Additional information

Please answer the following questions and, where the answer to any question is “no”, provide further detail.

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

Yes

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

No, the Applicant is not and has never previously been under external administration.

- ▲ Is the applicant immune from suit in respect of the obligations under the Electricity Act 1996?

No, the Applicant is not immune for suit in respect of the obligations under the Electricity Act 1996 (SA).

- ▲ Is the applicant capable of being sued in its own name in a court of Australia?

Yes

3.7 Financial resources available to the Applicant

Provide information about the financial resources available to the applicant. If the applicant is a company, please also enclose:

- ▲ copies of all audited profit and loss statements and balance sheets for the last three financial years (including all notes), and
- ▲ director's declaration that the financial statements comply with accounting standards, give a true and fair view, have been made in accordance with the Corporations Act and that there are reasonable grounds to believe the company/entity will be able to pay its debts as and when they fall due; and
- ▲ the director's report and the audit opinion.

If the applicant is a subsidiary company, please also provide:

- ▲ copies of all audited profit and loss statements and balance sheets of the applicant's parent company for up to the last three financial years.

The applicant should also submit copies of:

- ▲ its business plans including at least strategic direction and objectives, identified opportunities in the market place and forecast results; and
- ▲ evidence of capital and liquidity support in place, including any bank or cross guarantees, to support the business and evidence of negotiations with the network service provider concerning credit support arrangements.

EN Trust is a recently created entity and has not commenced business trading activities. EN Trust is a wholly owned subsidiary of its ASX-listed ultimate parent company, ReNu Energy.

Financial Statements

Copies of ReNu Energy's audited financial reports for the years ending 30 June 2015, 2016 and 2017 are attached:

- **Appendix C-1** – 2017 Audited Financial Statements

- **Appendix C-2** – 2016 Audited Financial Statements

- **Appendix C-3** – 2015 Audited Financial Statements

Capital and liquidity support

As an ASX-listed company, ReNu Energy has access to equity through the issue of new shares to existing shareholders and new investors. In addition to access to capital markets, ReNu Energy has mandated the Infradebt Ethical Infrastructure Debt Fund to provide initial debt facilities to fund solar projects within the ReNu Group and is currently finalising a facility of up to \$2.8 million under this mandate for use by EN Trust to fund the installation of solar PV equipment and embedded networks at four of the Shopping Centres Australasia Property Group RE Limited shopping centres across Australia.

The ReNu Energy and EN Trust are parties to a deed of cross guarantee under which ReNu Energy guarantees the debts of its wholly owned subsidiary, EN Trust. EN Trust is given financial support through the deed of cross guarantee. (refer **Appendix C-4** – Parent Company Guarantee).

Business plan

Refer **Appendix C-5** – ReNu Energy Business Plan.

3.8 Additional Details of Structure of Applicant

If the applicant is part of a group of related companies, and/or party to a partnership, joint venture or alliance agreement with another company, please provide:

- ▲ contractual arrangements (e.g. alliance contracts, associate contracts, establishment contracts) that define relationships within the group – including shared resources, guarantees, revenue flows, obligations and or responsibilities.

Refer sections 3.5 and 3.7 above for explanation of the ReNu Group structure, including the operational and financial support provided to the Applicant, EN Trust.

EN Trust is fully supported by the resources of the ReNu Group, with experienced personnel engaged by ReNu Energy being deployed to manage the operations of the EN Trust.

EN Trust will operate the solar PV system at the Murray Bridge Marketplace and Mt Gambier Marketplace shopping centres and will sell the electricity generated to another ReNu Group company, ReNu Energy Retail Pty Ltd (which will hold an AER Retailer Authorisation - application pending) under a Power Purchase Agreement. ReNu Energy Retail Pty Ltd will then sell the electricity to the shopping centre owner and the tenants who participate in the embedded network at the shopping centres.

The Applicant, through the proposed structure, has demonstrated competence in managing a generation business.

3.9 Human resources available to the Applicant

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

- ▲ the experience and qualifications of those employees outlined in the organisational chart (see point 1.6);

- ▲ if the applicant will employ contractor/s to assist with the licensed operations, the name of that contractor/s, details about the experience of the contractor/s in such operations and details of the processes in place to ensure the contractor/s complies with the regulatory obligations imposed by the licence; and

The ReNu Group has recruited staff with extensive energy experience covering risk management, compliance and operations. A summary of qualifications, technical skills and experience of the Board of directors and the key personnel involved in the day-to-day operations of the Applicant, are outlined in **Appendix A-3**.

The following ReNu Group personnel and contractors will be engaged in the installation and maintenance of the system:

1. ReNu Energy's Solar Project Management team will provide technical oversight and project management of the installation of the solar PV system. ReNu Energy's Solar Project Management team includes personnel with Clean Energy Council solar design and installation qualifications.
2. Class A Energy Solutions, Tad Mar Electrical and Plus ES will install the solar PV system and Embedded Network metering under instruction from ReNu Energy's Solar Project Management team who will be responsible for ensuring compliance with recognised Standards and Regulations, Workplace Health and Safety, company policies and procedures.
3. Advanced Electric Solutions will design and build of the Solar Network Protection Units, Metering Panels, PFCUs and act as an Electrical Engineering consultant on the project. Advanced Electrical Solutions are an ISO 9001 accredited group who design and build electrical switchboards and Power Factor Correction Units to fully comply with AS/NZS 61439 and Supply Authority Service Rules (refer to **Appendix D** – Advanced Electric solutions Capability Statement).
4. GHD Engineering has been engaged by the Applicant to develop a Commissioning Plan and Commissioning Method Statement for the solar PV system. As part of this engagement, GHD Engineering will also provide a competent and suitably qualified commissioning officer to witness and approve the commissioning of all protection equipment to SA Power Networks approved settings and issue a certificate of compliance for the solar PV system to SA Power Networks prior to connection to the network. (refer to **Appendix E** – GHD Engineers Curriculum Vitae).
5. ReNu Energy's solar operations team will be responsible for the day-to-day management of the solar PV system. The solar PV system will be remotely monitored by ReNu Energy's solar operations team through Aurora Vision which provides web based real time monitoring of the plant status, events and device alarms. In addition, Class A Energy Solutions will be engaged to provide ongoing maintenance of the solar PV system.
6. An operational maintenance schedule will be executed by Class A Energy Solutions, which includes programmed inspections, maintenance and cleaning as per AS/NZS 5033 as well as SA Power Networks requirements to ensure that the system remains compliant (refer to **Appendix F** – Class A Energy Solutions Capability Statement).

3.10 Technical resources available to the Applicant

Applicants for a transmission or distribution licence are asked to provide details about the availability of technical resources to be used in carrying out the operations for which a licence is sought. The information should include details about the technically qualified



staff available to the applicant and (if relevant) details of experience gained in similar operations.

Where applicants are relying on a third party to provide staff and resources to meet the technical requirements of the transmission or distribution licence, please provide:

- ▲ a list of all functions and activities being proposed to outsource;
- ▲ details of any formal agreement/s to provide services, including confirmation that the third party possess relevant technical competencies to conduct the proposed activities;
- ▲ a summary of the third party's technical capacity to meet relevant obligations, including relevant accreditations; and
- ▲ a summary of the third party's experience and knowledge in the relevant area.

The Applicant has set up a Solar Project Management team which is backed up by external Consultants/Contractors to oversee the construction of the solar farm and the ongoing operation and maintenance activities. Please refer to section 3.9 above for a description of the technical capabilities of the Solar Project Management team and the Applicant's consultants and contractors.

3.11 Safety of Network

The Commission may not issue a transmission or distribution licence unless it is satisfied that the transmission or distribution network (or the proposed network) will have the necessary capacity for transmitting or distributing electricity safely. Applicants are therefore asked to verify that the network has been (or will be) developed in accordance with relevant Australian Industry Codes and Australian Standards, and that a connection agreement has been or will be signed.

Murray Bridge Marketplace Project

The Applicant engaged SA Power Networks to prepare an engineering report with respect to the proposed solar PV system at Murray Bridge Marketplace shopping centre, 21-53 South Terrace, Murray Bridge SA 5253. (refer **Appendix G-1** – SA Power Networks Engineering Report 20-Nov-17 Issue A)

Since receipt of the engineering report, the Applicant has made application with SA Power Networks to enter into a Connection Agreement (SA Power Networks Ref: NC7952) in relation to the solar PV system. The Connection Agreement will include provisions that the plant and equipment will meet the licensing principles and complies with all Australian Industry Codes and Australian Standards.

Mt Gambier Marketplace Project

The Applicant engaged SA Power Networks to prepare an engineering report with respect to the solar PV system. (refer **Appendix G-2** – SA Power Networks Engineering Report 24-Nov-17 Issue A)

Since receipt of the engineering report, the Applicant has made application with SA Power Networks to enter into a Connection Agreement (SA Power Networks Ref: NC7952) in relation to the solar PV system. The Connection Agreement will include provisions that the plant and equipment will meet the licensing principles and complies with all Australian Industry Codes and Australian Standards.

3.12 Risk Management

Provide confirmation and reasonable evidence that the applicant's management has identified the risks associated with electricity operations and has established, utilises and relies upon risk management systems and processes which are adequate, accurate and current to address those risks. A copy of the applicant's risk management strategy should be submitted.

The above-mentioned design, construction and asset management structure demonstrates the Applicant's ability, complimented by the capabilities and experience of its contractors and consultants, to ensure that it has sufficient market knowledge to manage all possible risks relating to construction, operation and maintenance of the solar PV system.

In addition, the Applicant, through its parent entity, has a Risk Management Plan which defines the process flow to implement risk management strategies across all organisational activities in accordance with the requirements of AS/NZS ISO 31000: 2009 (Risk Management). Risks are analysed using a risk matrix.

The ReNu Energy Risk Matrix and descriptors of exposure encompass Health and Safety; Environment; Community & Reputation; Legal and Compliance; and Financial and Commercial.

Refer **Appendix H** - Risk Management Plan and Matrix

3.13 Development Act Approval

Please advise if the applicant has or is applying for approval under the Development Act 1993 (SA). If so, provide details, including the date on which approval was or will be granted.

Refer **Appendix I-1** – Rural City of Murray Bridge DA 415/377/2017

Refer **Appendix I-2** – City of Mount Gambier DA 318/0321/2017

3.14 Registration with AEMO

Please advise if the applicant will apply to register with AEMO. If so, provide details.

The solar PV system for both projects are each exempt from registration under the AEMO Standing Exemption for Small Generating Systems under 5 MW.

3.15 Licences held by the Applicant in other Australian jurisdictions.

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

Entity	Type	Class	Date of issue	Customer	Status
EN Trust	Retail Exemption	Individual	8/11/2017	Griffin Plaza, NSW	Current
EN Trust	Network	Registrable exemption	10/11/2017	Griffin Plaza,	Current

Entity	Type	Class	Date of issue	Customer	Status
	Exemption	classes NR1, NR5		NSW	

3.16 Previous unsuccessful licence applications in other Australian jurisdictions

Please state whether the applicant has applied for an electricity or gas licence in another Australian jurisdiction and not been issued with a licence, and provide details if relevant.

Nil.

3.17 Licences held by Associates of the Applicant

If an associate of the applicant (within the meaning of the Corporations Act) holds an electricity or gas licence in South Australia or in other Australian jurisdictions, please provide details.

Entity within the ReNu Energy Group	Type	Class	Date of issue	Customer
SM Project Trust	Retail Exemption	R8	30/10/2017	Southern Meats, NSW
Quantum Power Limited	Retail Exemption	Individual	23/10/2015	AJ Bush and PPA's in general, QLD
GDY Solar	Retail Exemption	Individual	15/5/2015	for PPA's in general
ReNu Energy Retail Pty Ltd	Retailer Authorisation	Individual	Application pending	for electricity retailing operations within embedded networks

3.18 Compliance Plans

Applicants are required to submit a copy of their Compliance Plan which demonstrates how the compliance systems the applicant has (or will have) in place will ensure compliance with all of the applicable regulatory obligations imposed by the relevant licence.

ReNu Energy will provide Annual Compliance Reports to Essential Services Commission of South Australia (ESCOSA) to ensure compliance with all the regulatory obligations imposed the generation licence.

A compliance framework is being established which will assign responsibilities for obligations to the relevant personnel. ReNu Energy has engaged GHD Pty Ltd for these works.

3.19 Additional Information

The Commission encourages applicants to provide any additional information they consider would be of assistance in supporting the application. Please provide below.

No additional information attached.



4 FACTORS SPECIFIED IN THE ESSENTIAL SERVICES COMMISSION ACT 2002

In considering a licence application, the Commission must have as its primary objective protection of the long term interests of consumers with respect to the price, quality and reliability of electricity supply, and must also have regard to the need to:

- (a) promote competitive and fair market conduct;
- (b) prevent misuse of monopoly or market power;
- (c) facilitate entry into relevant markets;
- (d) promote economic efficiency;
- (e) ensure consumers benefit from competition and efficiency;
- (f) facilitate maintenance of the financial viability of regulated industries and the incentive for long term investment;
- (g) promote consistency in regulation with other jurisdictions.

If the applicant believes that information about their application would assist the Commission in its consideration of these factors, the applicant should provide such information below.

ReNu Energy Limited (ASX: RNE) is a clean energy products and services company which delivers independent power solutions using a build, own, operate and maintain (**BOOM**) model. Under the BOOM model, ReNu Energy secures stable revenue streams under long-dated contracts and customers are able to access the benefits of renewable energy with no upfront cost.

Headquartered in Brisbane, Queensland, ReNu Energy's team has strong experience and capability in the renewable energy, utility and infrastructure sectors. The Company seeks to own projects utilising proven technologies such as solar PV that will reduce electricity costs and carbon emissions for customers.

ReNu Energy solar PV and embedded network projects operate behind the meter, providing electricity directly to customers in the commercial, industrial and agricultural sectors. ReNu Energy currently has two behind the meter biogas to energy projects in operation.

ReNu Energy has signed an agreement with Shopping Centres Australasia Property Group RE Limited (**SCA**) to install solar and embedded networks on SCA shopping centres across Australia, which includes the solar PV systems to be located at Murray Bridge Marketplace shopping centre and the Mt Gambier Marketplace shopping centre, which are the subject of this application. The first SCA solar PV system project was Griffin Plaza in Griffith, New South Wales. On 8 November 2017, the Australian Energy Regulator (**AER**) approved an application from EN Trust for an individual exemption from the requirement to hold a retailer authorisation under the National Energy Retail Law to sell energy at Griffin Plaza Shopping Centre. A further application has also been submitted to the AER for a Retailer Authorisation, to support the expansion of ReNu Group's embedded network operations.

ReNu Energy intends to install solar PV systems and embedded networks to enable the supply of competitive energy rates while also giving shopping centre owners and tenants the ability to utilise renewable energy. The tenants connected to the shopping centre embedded network will still have access to other electricity retailers of their choice to maintain competition for electricity supply.

It is the objective of the Applicant to establish a more appropriate electricity supply arrangement by establishing solar PV embedded networks at the Murray Bridge Marketplace and Mt Gambier Marketplace shopping centres that are more reflective of the true cost of supply to the sites, take advantage of the generation of electricity from solar PV and deliver lower electricity charges for the commercial tenants than otherwise achievable through any traditional electricity retail arrangement.



5 APPLICATION FEES

Applicants for a licence must pay to the Commission an application fee fixed by the Minister for Energy from time to time. This fee is presently set at \$1,000 per licence. Please enclose this fee with the application. An application cannot be considered until this fee has been received.

6 DECLARATION

All information in this application for the issue of a licence to authorise electricity transmission or distribution operations in the electricity supply industry in South Australia must be verified by a Statutory Declaration of the applicant, in accordance with the provisions of the *Oaths Act 1936* (SA), stating that the information contained in the application is true and correct to the best of the applicant's knowledge, information and belief.

Where the applicant is a body corporate, evidence of the relevant authority of the declarant to sign on behalf of the body corporate must also be provided to the Commission.

Statutory Declaration

I CHRISTOPHER ROSS MURRAY

of C/O RENU ENERGY LTD LEVEL 9 GARDNER CL. MILTON QLD 4064

do solemnly and sincerely declare that the information contained in this Application for the issue of a licence to authorise electricity transmission or distribution operations in the electricity supply industry in South Australia is true and correct to the best of my knowledge information and belief.

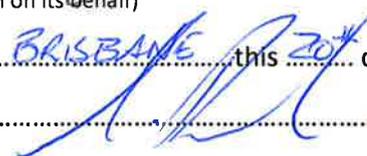
And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the *Oaths Act 1936*.

Date 20/2/18

Signature 

(Where the applicant is a body corporate, the declaration must be made by a person authorised by body corporate to sign on its behalf)

Declared at: BRISBANE this 20th day of FEBRUARY 2018

Before me:  SOLICITOR

(Signature of Justice of the Peace or other person authorised under the *Oaths Act 1936*)