



Application form for the issue of an Electricity Generation Licence

by the Essential Services Commission of SA under the Electricity Act 1996

August 2017

Enquiries concerning this application form should be addressed to:

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Licence requirements and conditions

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

Generation operations which require a licence

Section 15(2)(a) of the *Electricity Act 1996 (Act)*¹ is explicit in that it requires a person that carries on the operation of the generation of electricity to hold a licence. This requirement applies to all generators with the exception of a generator that can rely on:

- (1) one of the statutory exemptions specified in the Electricity (General) Regulations 1997 (**Regulations**) outlined below;
- (2) an individual exemption issued by the Commission (with the approval of the Minister) pursuant to section 80(1) of the Act; or
- (3) an exemption made by Governor under a regulation pursuant to section 98(2)(e) of the Act.

Pursuant to Regulations 6(1) and (2), the following generators are exempt from the requirement to hold a generation licence:

- ▶ a generator whose generating plant has a rated nameplate output of 100kVA or less;
- ▶ a generator that does not supply electricity for reward to or by means of a transmission or distribution network;
- ▶ a generator that generates electricity for the sole consumption of that generator or a designated body (such bodies must be designated by the Minister²); or
- ▶ a generator that generates electricity for a person at a premises occupied or used by the person as a tenant or licensee (whether directly or indirectly) of the generator (or a designated body) where that person is not charged for the supply of electricity except by a licensed retailer/generator or as an unspecified part of rent or charges for the occupation or use of the premises.

It is important for generators (or proposed generators) to carefully consider whether they can rely on a statutory exemption from the requirement to be licensed. If the reliance on a statutory exemption is queried by the Commission, the onus to provide evidence that a particular exemption can be relied upon is on the relevant generator.

In addition, in the event that the operations of a generator change so that it can no longer rely on one of the three exemptions specified above, it will need to apply to the Commission for a generation licence immediately in order to continue those operations.

Mandatory licence conditions

Sections 21(1) and 22 of the Act requires the Commission to place certain mandatory conditions in generation licences. The Commission strongly recommends that applicants review these mandatory conditions. Applicants must be familiar with the relevant conditions and confident that they can comply with the conditions.

Additional technical licence conditions

Additional technical licence conditions apply to all new electricity generators seeking to connect to the South Australian power system. Applicants for a generation licence should familiarise

¹ Available at <https://www.legislation.sa.gov.au/LZ/C/A/ELECTRICITY%20ACT%201996.aspx>

² To date, the Minister for Energy and Resources has not designated any bodies for the purposes of Regulations 6(1).

themselves with the Commission's Inquiry into the licensing arrangements for generators in South Australia final report, available on the Commissions website.³

Model licence conditions reflecting the Inquiry findings and conclusions have been developed and are available in Appendix 1. The model conditions will be applicable to all new applications, having regard to advice from the Australian Energy Market Operator (**AEMO**) on the specific circumstances of individual applications received.

Depending on the specific characteristics of a given generation project, the model conditions may be varied to the degree necessary to ensure that South Australian consumers' long-term interests with respect to the price, quality and reliability of electricity services are protected.

Annual licence fees

Holding a licence incurs annual licence fees. The licence fees determined by the Minister for Resources and 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.

³ Refer: <http://www.escosa.sa.gov.au/projects-and-publications/projects/inquiries/inquiry-into-licensing-arrangements-under-the-electricity-act-1996-for-inverter-connected-generators/inquiry-into-licensing-arrangements-under-the-electricity-act-1996-for-inverter-connected-generators>

Consultation and Confidentiality

The Commission will consult with relevant government, industry and consumer groups in the conduct of its licensing functions through a public consultation process. Consequently, applications and/or supporting information will be made available on the Commission's website and in hard copy from the Commission's office for this purpose.

If applicants believe that they are providing confidential information when completing this form they should write "this information is confidential" after any such information. It is the applicant's responsibility to ensure this is clearly highlighted on the form. Applicants should also provide a 'non-confidential' version of the form capable of publication on the Commission's website.

The Commission will use information supplied in applications and in support of applications in accordance with the requirements of Part 5 of the Essential Services Commission Act 2002. Applicants claiming confidentiality are encouraged to familiarise themselves with Part 5. Applicants should note that the Commission may disclose confidential information in some circumstances.

Further information

Applicants should note that the Commission may ask applicants who have submitted an application form to provide further information to the Commission, or to clarify the information that they have already provided if required.

Please note that, in the event that an application lacks sufficient detail and the Commission is required to request additional information from an applicant, delays in the assessment of the application may occur.

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 generation 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)

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 at **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 Date from which Licence is sought

Applicants should usually allow the Commission a minimum of 12 weeks to consider an application, as a public consultation period of at least four weeks forms part of the Commission's consideration of licence applications. 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.

1 May 2018.

2.2 Nature and scope of operations for which Licence is sought

Applicants for a generation licence must state the location of the generation plant, the expected name plate capacity of the generation plant, the type of generation and fuel used and some details about how the generator is to be connected to the network. Applicants for a wind generation licence must attach a map showing the location of the wind turbines.

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.

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.

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.

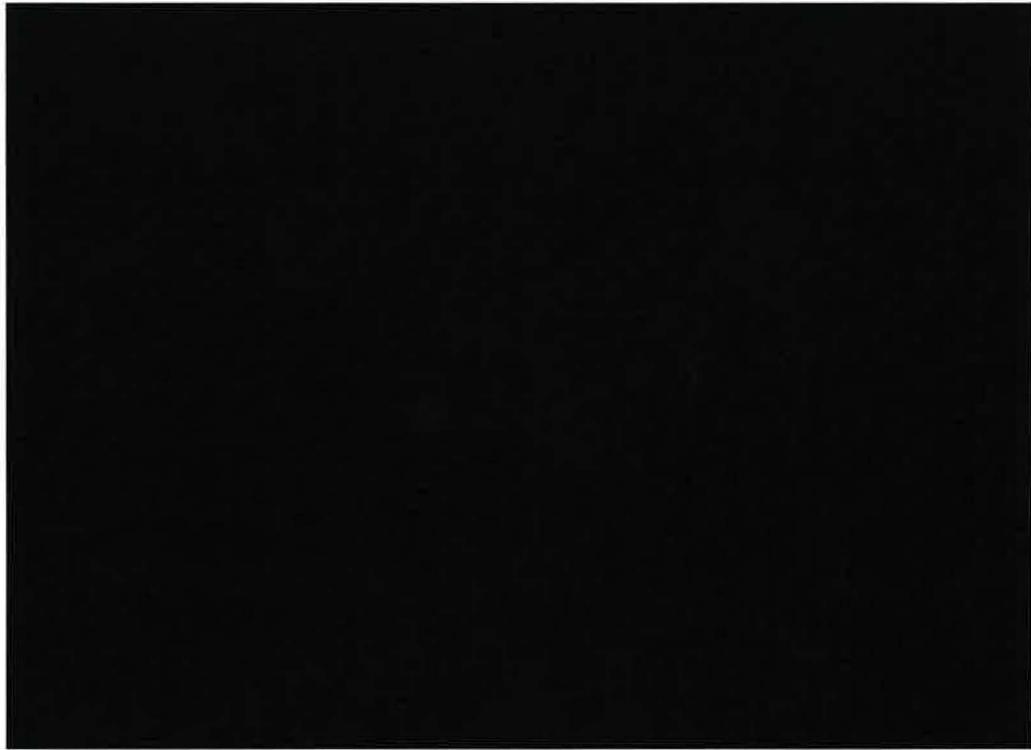
The ReNu Group's relevant governance documents are outlined in the appendices as follows:

- **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 to 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
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3.6 Additional information

Please answer the following questions.

- ▶ Is the applicant a resident of, or does it have permanent establishment in, Australia? Where the answer to this question is no, please provide further detail.

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? Where the answer to this question is yes, please provide further detail.

No

- ▶ Is the applicant immune from suit in respect of the obligations under the Electricity Act 1996? Where the answer to this question is yes, please provide further detail.

No

- ▶ Is the applicant capable of being sued in its own name in a court of Australia? Where the answer to this question is no, please provide further detail.

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. (attached at **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); and
- ▶ 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.

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. For the Murray Bridge Marketplace project, 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).
7. For the Mt Gambier Marketplace project, an operational maintenance schedule will be executed by a local company yet to be decided. The company engaged will conduct programmed inspections, maintenance and cleaning as per AS/NZS 5033 as well as SA Power Networks requirements to ensure that the system remains compliant.

3.10 Technical resources available to the Applicant

Applicants for a generation 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 generation 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 Quality of Electricity Produced/Connection Agreement

The Commission may not issue a generation licence unless it is satisfied that the generating plant (or proposed generating plant) will generate electricity of the appropriate quality for the relevant transmission or distribution network. The Commission will be satisfied that the electricity is of an appropriate quality if the applicant has entered into a connection agreement which meets the Commission's technical requirements with the licensed operator of the relevant transmission or distribution network. Applicants are therefore required to submit a copy of such a connection agreement.

Murray Bridge Marketplace Project

The Applicant engaged SA Power Networks to prepare an engineering report with respect to the solar PV system. (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: NC007952) in relation to the solar PV system. The Connection Agreement will include provisions that the plant and equipment will meet the licensing principles.

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: NC008569) in relation to the solar PV system. The Connection Agreement will include provisions that the plant and equipment will meet the licensing principles.

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. Applicants for a wind generation licence should note that registration as a semi-scheduled market participant is required for all new generators and all expansions to existing wind generation plant.

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 Exemption	Registrable exemption classes NR1, NR5	10/11/2017	Griffin Plaza, NSW	Current

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

Entity within the ReNu Energy Group	Type	Class	Date of issue	Customer
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 Australis (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 and cannot be refunded.

6 Declaration

All information in this application for the issue of a licence to authorise electricity generation 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)*⁴, 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.⁵

Statutory Declaration

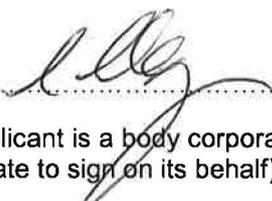
I CHRISTOPHER ROSS MURRAY

of C/O RENV ENERGY LTD LEVEL 1, 9 GARDNER CL. MILTON QD 4064

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

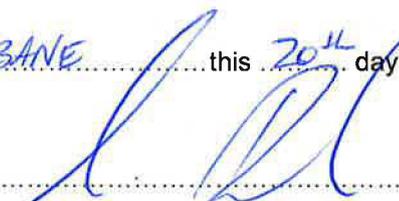
And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the *Oaths Act 1936*.

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*)

⁴ or equivalent legislation in other Australian jurisdictions.

⁵ The Commission will accept a copy of a Board minute (or circulating resolution) giving approval for the declarant to sign on behalf of the applicant as evidence of the relevant authority.

Attachment 1

2017 model licence conditions for new generators

Interpretation of this schedule

1. Interpretation

1.1. Terms used in this schedule and also in the National Electricity Rules (NER) have the same meaning in this schedule as they have in those rules (unless otherwise specified or unless the context otherwise requires).

1.2. For the purposes of this schedule, the term:

Commission - means the Essential Services Commission, established under the Essential Services Commission Act 2002.

continuous uninterrupted operation means that, for voltage disturbances within the continuous operating range (that is, connection point voltage fluctuating within 90 percent and 110 percent of normal voltage), active power must be maintained (unless there has been a change in the intermittent power source) and reactive power must be managed to meet voltage control requirements.

Disturbance ride through capability

2. Disturbance ride through capability – general requirements

2.1. The non-synchronous generating system must meet the following requirements:

- (a) The low voltage ride-through activation threshold (LVRT), as measured at the low voltage (LV) terminals of the generating units and dynamic reactive support plant (as applicable), must not be less than 85 percent of nominal voltage.
- (b) The generating system must maintain continuous uninterrupted operation for voltage disturbances as specified in clauses 3, 7 and 8.
- (c) Where LVRT and high voltage ride-through (HVRT) requirements in the NER are specified in respect of the generating system's connection point, the withstand capability of individual generating units is to be determined at the LV side of the generating unit's transformer. All individual generating units must remain connected for connection point voltages within the LVRT/HVRT withstand requirements, irrespective of the generating system's transformer tap position.

3. Disturbance ride-through (reactive current injection)

3.1. The generating system must supply additional capacitive reactive current (reactive current injection) of up to 4 percent of the maximum continuous current of the generating system (in the absence of a disturbance) for each 1 percent reduction of connection point voltage below 90 percent of normal voltage, as shown in Table 1. This requirement applies at the LV terminals of the generating units and dynamic reactive support plant (as applicable) for power system disturbances resulting in a voltage reduction of up to 100 percent of normal voltage at the connection point.

3.2. The generating system must supply additional inductive reactive current (reactive current absorption) of up to 6 percent of the maximum continuous current of the generating system (in the absence of a disturbance) for each 1 percent increase in connection point voltage

above 110 percent of the normal voltage, as shown in Table 1. This requirement applies at the LV terminals of the generating units and dynamic reactive support plant (as applicable).

- 3.3. The reactive current injection must be maintained until the connection point voltage returns to within the range of 90 percent to 110 percent of normal voltage.

Table 1: Reactive current injection requirements

Reactive current response	Current injection gain (%)	Current absorption gain (%)	Minimum amount of contribution as percentage of rated current	Speed of contribution	
				Rise time (millisecond)	Settling time (millisecond)
Synchronous	4	6	250	30	N/A
Non-synchronous	4	6	100	30	60

- 3.4. The amount of reactive current injection required may be calculated using phase-to-phase, phase-to-ground, or sequence components of voltage. For the last method, the ratio of negative-sequence to positive-sequence current injection must be X.⁶
- 3.5. The generating system must comply with the following response characteristics for reactive current injection:
- (a) A rise time no greater than 30 milliseconds and a settling time no greater than 60 milliseconds applies to reactive current injection requirements.⁷
 - (b) The reactive current injection requirements described above apply for all pre-disturbance reactive power control modes (voltage control, power factor control and reactive power control).⁸
 - (c) The reactive current response must be adequately damped as defined in the NER.
 - (d) Upon occurrence of a fault, reactive power consumption must not exceed 5 percent of maximum continuous rated current of the generating system and must be limited to the rise time duration set out in Table 1.
 - (e) The post-fault reactive power contribution of the generating system must be sufficient to ensure that the connection point voltage is within the following ranges for continuous uninterrupted operation:
 - (i) voltages over 110 percent for the durations permitted under NER clause S5.1a.4;
 - (ii) 90 percent to 110 percent of normal voltage continuously;
 - (iii) 80 percent to 90 percent of normal voltage for a period of at least 10 seconds; and
 - (iv) 70 percent to 80 percent of normal voltage for a period of at least 2 seconds.

⁶ The exact ratio of negative-sequence to positive-sequence current injection will be specified by the Commission at the time the licence is issued.

⁷ The settling time requirement does not apply to synchronous generators.

⁸ This requirement does not apply to synchronous generators.

4. Disturbance ride through (active power injection requirements)

- 4.1. The generating system must be capable of restoring active power to at least 95 percent of the level existing just prior to a fault within X milliseconds after disconnection of the faulted element.⁹
- 4.2. Upon occurrence of a fault, a generating system's transient active power consumption must not exceed one power frequency cycle and must not exceed 5 percent of the maximum continuous rated current of the generating system.

5. Multiple low voltage disturbance ride-through

- 5.1. The generating system, including, but not limited to, each of its generating units and dynamic reactive power support plant, must be capable of withstanding both of the following within a five minute interval:
 - (a) Any combination of voltage disturbances causing the voltage at the respective low voltage (LV) terminals of the equipment to drop below 85 percent of the nominal voltage for a total duration of 1,500 milliseconds regardless of disturbance type, duration, and residual voltage at the generating unit's terminals. The total number of voltage disturbances for which successful ride-through is required is limited to 15. Each fault can be a solid fault resulting in 100 percent voltage drop at the connection point with duration not exceeding the longest time expected to be taken for the breaker fail protection system to clear the fault, as set out in Table S5.1a.2 of the NER.
 - (b) A single worst-case long-duration shallow voltage disturbance, causing the voltage at the connection point to drop to 70- 80 percent of the normal voltage for a total duration of 2,000 milliseconds.
- 5.2. Subject to compliance with the requirements in clause 5.1, the generating system, including, but not limited to, each of its generating units and dynamic reactive power support plant, is not required to withstand any additional voltage variation exceeding ± 10 percent of nominal voltage experienced at the respective LV terminals within 30 minutes from the commencement of the first variation.¹⁰

6. Disturbance ride-through (high voltage disturbance ride-through)

- 6.1. The generating system must have a level of over-voltage withstand capability consistent with the levels shown in Table 2.¹¹
- 6.2. The generating system must maintain continuous uninterrupted operation for temporary over voltage durations as specified in Table 2.

Table 2: Required over voltage withstand capability

Temporary overvoltage (% of normal voltage)	110–115	>115–120	>120–125	>125–130	>130–140
Duration(s)	1,200	20	2	0.2	0.02

⁹ The exact active power recovery time will be specified by the Commission at the time the licence is issued and will be between 100 and 500 milliseconds.

¹⁰ For synchronous generators, consideration will be given to the physical limitations of the plant. This may require a variation to this condition, to be determined by Commission at the time of issuing of the licence.

¹¹ Unless otherwise specified by the Commission at the time the licence is issued.

7. Disturbance ride-through (partial load rejection)

- 7.1. The non-synchronous generating system must be capable of continuous uninterrupted operation during and following a power system load reduction of 30 percent from its pre-disturbance level or equivalent impact from separation of part of the power system in less than 10 seconds, provided that the loading level remains above minimum load.

8. Disturbance ride-through (frequency disturbance ride-through)

- 8.1. The generating system must be capable of continuous uninterrupted operation for any combination of the following rates of change of frequency:
- (a) ± 4 Hz/s for 250 milliseconds
 - (b) ± 3 Hz/s for 1 second, until such time as power system frequency breaches the extreme frequency excursion tolerance limits.¹²

9. Disturbance ride-through (voltage phase angle shift)

- 9.1. The generating system must not include any vector shift or similar relay/protective function acting upon voltage phase angle which might operate for phase angle changes less than 20 degrees.

Voltage control capability

10. Voltage control capability

- 10.1. The generating system must be capable of being controlled by a fast-acting, continuously variable, voltage control system which must be able to receive a local and remote voltage set point.
- 10.2. The generating system must be capable of operating at either a set reactive power level or a set power factor, which must be able to be set locally or remotely at any time.
- 10.3. The voltage, power factor and reactive power control mode of the generating system must be capable of:
- (a) being overridden by the disturbance ride through requirements specified in clauses **Error! Reference source not found.** to 9 (inclusive) during power system voltage disturbances, and
 - (b) automatically reverting to power factor or reactive power mode when the disturbance has ceased.

System strength

11. System strength

- 11.1. Individual components of plant within a generating system, which includes but is not limited to generating units and dynamic reactive power plant, must be capable of operating down to the following levels at the high voltage terminals in relation to each component:
- (a) minimum short circuit ratio of 1.5, and
 - (b) minimum positive sequence X/R ratio of 2.

¹² For synchronous generators, consideration will be given to the physical limitations of the plant. This may require a variation to this condition, to be determined by the Commission at the time of issuing of the licence.

Active power control capability

12. Active power control capability

- 12.1. The generating system must be capable of automatically providing a proportional increase or decrease in active power output, in response to falling and rising power system frequency respectively.
- 12.2. To comply with clause 12.1:
 - (a) An active power response to changing power system frequency must be provided with no delay, beyond that required for stable operation, or inherent in the plant controls, once frequency leaves the deadband.
 - (b) The steady state droop setting of the active power response must be adjustable in the range 2 percent to 10 percent.
 - (c) The frequency deadband for the active power response must be adjustable in the range from 0 to +/- 1.0 Hz.
- 12.3. The generating system must be capable of sustaining a response to abnormal frequency conditions for at least 10 minutes, subject only to energy resource availability for intermittent generating systems.
- 12.4. The generating system must be capable of applying different deadband and droop settings in response to rising and falling frequency and for different levels of frequency change.

13. Active power control capability (AGC capability)

- 13.1. The generating system must have active power control capabilities that allow it to participate in existing national electricity market arrangements requiring automatic generation control (**AGC**).
- 13.2. At a minimum, the AGC must have the capability to:
 - (a) receive and respond to a remotely determined active power control setpoint, updated at a rate of every four seconds, transmitted to the generating system, and
 - (b) provide the following information to AEMO, upon a request from AEMO under NER clauses S5.2.6.1 or 3.8.2:
 - (i) actual active power output;
 - (ii) maximum raise limit;
 - (iii) minimum lower limit;
 - (iv) maximum raise ramp rate; and
 - (v) maximum lower ramp rate.

14. Active power control capability (rate of change of active power)

- 14.1. The generating system must be capable of limiting the rate of change of active power, both upwards and downwards. A generating system is not required to comply with a limit on the

rate of reduction of active power where the reduction in active power is caused by energy resource availability for intermittent generating systems.

- 14.2. The generating system must be capable of implementing different active power rate limits for operation in the normal operating frequency band and for contingency events.
- 14.3. The generating system must be capable of setting a ramp rate limit with accuracy of within 10 percent.

15. Active power control capability

- 15.1. The generating system must have the capability to provide real-time information about its active power control settings to AEMO, including mode of operation, deadband and droop parameters and any other active power control setting that may change during real-time operation.

System restoration 2017

16. System restoration

- ~~16.1. Where sufficient minimum fault level is available from online synchronous machines, the generating system must have the following capability in the event of a black system:
 - ~~(a) the generating system must be capable of operation with auxiliary loads only for X minutes¹³ while system load is being restored, and~~
 - ~~(b) the generating system, including, but not limited to, each of its generating units and dynamic reactive power support plant (as applicable) must have the capability to provide steady state and dynamic reactive power when operating with auxiliary loads only for X minutes while system load is being restored.¹⁴~~~~

¹³ The exact duration will be specified by the Commission at the time the licence is issued.

¹⁴ The exact duration will be specified by the Commission at the time the licence is issued.



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