



Electricity



Licence variation form – generation

1. Details of the licensee

1.1. Name of licensee

South Australian Water Corporation (SA Water)

1.2. Legal identity of licensee

South Australian Statutory Corporation

1.3. ACN/ABN number

ACN Number (if applicable)

ABN Number 69 336 525 019

1.4. Address and contact details of licensee

Business Address

Street 250 Victoria Square

Suburb Adelaide

State SA Post Code 5000

Postal Address (if different to Business Address)

Street GPO Box 1751

Suburb Adelaide

State SA Post Code 5001

Telephone +61 08 8204 1000

Facsimile N/A

E-mail EnergyLicensing@sawater.com.au

1.5. Contact person on behalf of licensee

Full Name	Matthew Maeder		
Title	Energy Markets Compliance Lead		
Business Address			
Street	250 Victoria Square		
Suburb	Adelaide		
State	SA	Post Code	5000
Postal Address (if different to Business Address)			
Street	GPO Box 1751		
Suburb	Adelaide		
State	SA	Post Code	5000
Telephone	+61 08 7424 2459		
E-mail	Matthew.Maeder@sawater.com.au		

1.6. Contact person for licence fees

Full Name	Andrew Jackson		
Title	Manager Energy Services		
Business Address			
Street	250 Victoria Square		
Suburb	Adelaide		
State	SA	Post Code	5000
Postal Address (if different to Business Address)			
Street	GPO Box 1751		
Suburb	Adelaide		
State	SA	Post Code	5000
Telephone	+61 08 7424 1045		
E-mail	Andrew.Jackson@sawater.com.au		

1.7. Names and addresses of the officers of licensee

"Officers" of the application include the applicants, directors and secretary and any other persons who make or participate in making decisions that affect a substantial part of the applicants business.

Full Name: Andrew Fletcher AO

Office Held: Chair

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: John Bastian AM.....

Office Held: Non-Executive Director

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Sue Filby

Office Held: Non-Executive Director

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Janet Finlay

Office Held: Non-Executive Director

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Chris Ford

Office Held: Non-Executive Director

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Fiona Hele

Office Held: Non-Executive Director

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: David Ryan

Office Held: Chief Executive / Board Director

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Jacqueline Guerin.....

Office Held: Chief Financial Officer / GM Business Services

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Anne Westley

Office Held: Head of Govern and Integrity / Corporation Secretary

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Amanda Lewry

Office Held: General Manager Sustainable Infrastructure

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Anna Jackson.....

Office Held: General Manager Strategy Engagement and Innovation

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Chris Young

Office Held: General Manager Operations

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Kerry Rowlands

Office Held: General Manager Customer and Commercial

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

Full Name: Kylie Johnson.....

Office Held: General Manager People & Safety

Address: C/- SA Water

250 Victoria Square, Adelaide.....

State: South Australia..... Post Code: 5000.....

1.8. Names and addresses of major shareholders of licensee

Not Required.

2. The Variation

2.1. A detailed description of where the services will be provided

Please 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. For wind generation, please attach a map showing the location of the wind turbines.

For multiple generating plant please use Appendix 1.

Location	Details
Happy Valley Water Treatment Plant	Ground Mounted Solar Array Battery Energy Storage System
Christies Beach Water Treatment Plant	Ground Mounted Solar PV Array Battery Energy Storage System Diesel Generator x 2 Biogas Generator

Refer to Appendix 1 for details

2.2.

3. Suitability of licensee to continue to hold a licence

3.1. Standard of honesty and integrity shown by the licensee

Has the licensee been found guilty of any criminal offence since obtaining its licence? If "yes", please provide details.

No

Has the licensee 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*) since obtaining its licence? If "yes", please provide details.

Yes

Has the licensee been the subject of disciplinary action since obtaining its licence? If "yes", please provide details.

Yes,

SA Water's board, management and employees are at all times expected to act lawfully and within integrity and professionalism in all activities both internally and externally. SA Water has its own code of conduct and internal governance procedures to which all employees are expected to adhere.

SA Water has been the subject of the following prosecutions:

1. 2 June 2011, Mildura Magistrates Court – SA Water pleaded guilty to a charge of operating a tandem vehicle which was overloaded. The court imposed a fine of \$2,000 without recording a conviction.
2. 3 December 2009, Environmental Court, South Australia – SA Water pleaded guilty and was convicted of one offence of polluting the environment causing material harm, fined \$30,000 and ordered to pay a victim of crime levy of \$130
3. 7 May 2004, Environmental Court, South Australia, SA Water pleaded guilty and was convicted of causing an environmental nuisance contrary to section 82 and 127(1)(a) criminal injuries compensation levy of \$35, and the prosecution's technical cost of \$4,054.
4. 2004 – Prosecution for breach of the Occupational Health Safety and Welfare Act 1986.

Any other information to be disclosed?

No

3.2. Standard of honesty and integrity shown by officers and major shareholders of the licensee (if relevant)

Has any officer or major shareholder been found guilty of any criminal offence? If “yes”, please provide details.

No

Has any officer or major shareholder 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)? If “yes”, please provide details.

No

Has any officer or major shareholder been the subject of disciplinary action? If “yes”, please provide details.

No

Any other information to be disclosed?

SA Water believes the following information to be relevant to the commission when considering its suitability to hold a generation licence:

- None of the officers listed have displayed any prior misconduct, or experienced refusal or suspension from licensing or professional membership.
- None of its directors have been disqualified from managing corporations under the Corporations Act 2001.
- None of its officers have an actual or potential conflict of interest likely to affect their ability to carry out their role.
- Its officers have adequate experience and demonstrated competence in managing a generation licence.

As previously highlighted, SA Water has an established code of conduct and other policies and procedures applicable to all directors, managers and employees. In addition, SA Water has a comprehensive corporate governance and risk management framework which is summarised in the company’s latest annual report.

3.3. Details of the group members

If the licensee is part of a group of companies, please provide details on the entities within the group. Include all entities controlled by the licensee and the ultimate parent company. Please attach a diagram of this structure.

Sole Owner / Operator – SA Water Corporation

3.4. Additional details of the structure of the licensee

Is the licensee a part of a group of related companies, and/or party to a partnership, joint venture or alliance agreement with another company?

SA Water is a statutory Corporation (with no actual shareholders) established pursuant to the South Australian Water Corporation Act 1994 As a public Corporation it is an instrumentality of the Crown and is subject to control and direction by its Minister.

3.5. Additional information

Is the licensee a resident of, or does it have permanent establishment in, Australia? If "no", please provide further details

Yes

Is the licensee 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? If "yes", please provide further details.

Yes – SA Water Corporation.

SA Water Corporations Act 1994

Is the licensee immune from suit in respect of the obligations under the *Electricity Act 2012*? If "yes", please provide further details.

No

Is the licensee capable of being sued in its own name in a court of Australia? If "no", please provide further details

Yes

3.6. Financial resources available to the licensee

Please provide information about the financial resources available to the licensee, including:

- copies of audited profit and loss statements and balance sheets for the last three financial years (including all notes) (If the applicant is a subsidiary company please provide these for its parent company)
- the Directors 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.
- the Directors report and the audit opinion
- business plan, including strategic direction and objectives, identified opportunities in the market place and forecasted results
- 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.

SA Water Corporation Financial Statements & Documents are available at the below link

<https://www.sawater.com.au/about-us/annual-reports>.

3.7. Human resources available to the licensee

Please provide details about the human resources available to the licensee (e.g. the number of employees and the experience of these employees in providing the services for which the variation is sought.) If the licensee will employ additional contractor/s to assist with the operations, please provide the name of the contractor/s, and details about the experience of the contractor/s in such operations and details of the processes in place to ensure they will comply with the regulatory obligations imposed by the licence.

SA Water has extensive asset management capabilities, supported by comprehensive policies and procedures to ensure generation licence compliance, and has 5 pre-existing licences awarded by ESCOSA. Here are some examples of Greater than 5 MW licences

- Bolivar Power Station (9.9 MW)
- Morgan Whyalla PS3 (7.5 MW)
- Morgan Whyalla PS1 (4.6 MW)
- Morgan Whyalla PS2 (4.6 MW)
- Morgan Whyalla PS4 (4.56 MW)

Key SA Water executive, asset management and energy management team support the regulatory obligations imposed by these licences. This is outlined in the attached document ESCOSA Generation License Supporting Organisational Capabilities.

3.8. Technical resources available to the applicant

Please provide details about the availability of technical resources to be used in carrying out the services for which the variation is sought. Include details about the technically qualified staff available to the licensee and (if relevant) of experience gained in similar operations.

Where licensees are relying on a third party to provide staff and resources to meet the technical requirements of the licence/s, 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 process relevant technical competencies to conduct the proposed activities
- A summary of the third party's technical capacity to meet relevant obligations, including the relevant accreditations
- A summary of the third party's experience and knowledge in the area.

SA Water Corporation Water Treatment Plants, Pumping Stations and Desalination Plant are SA Water owned and managed by SA Water Staff, or by our alliance partners Allwater and Adelaide Aqua.

The electrical and instrumentation team structure is listed in figure 1 below. This team will be responsible for the maintenance of the whole of system generation on site.

The Plant's responsibility in relation to the generation system will include:

- Schedule and preventative maintenance
- Identification and analysis
- Rectification of faults
- Operational reporting to SA Water
- Provision of information to allow SA Water to satisfy their licence obligations

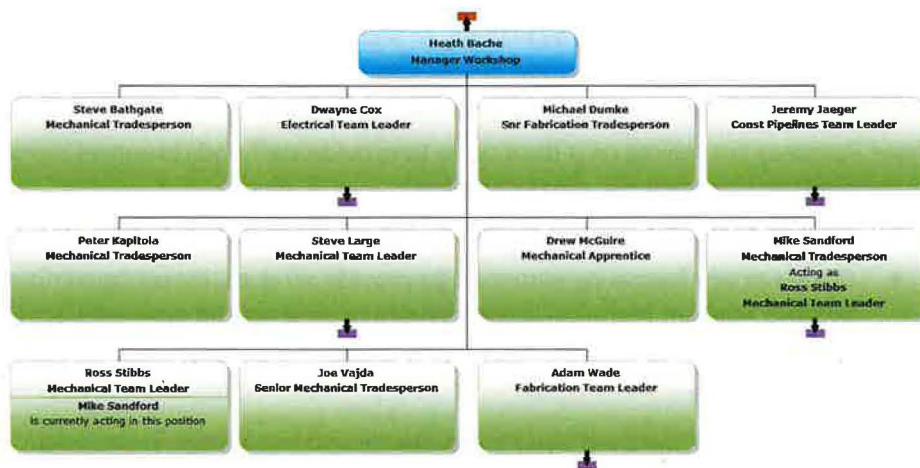
The SA Water Corporation facilities operate during business hours between the time of (7:30am and 3:30pm), where key personnel are on site. There is an on-call system where, outside these hours, critical alarms are sent to key personnel via SCADA phone.

Technical support for the Solar PV is available from the installers of the system, as well as from SA Water's senior electrical team.

Technical support is provided for the systems:

System	Company	Contact	E-mail	Phone
Solar PV	Enerven (Senior Project Manager)	James McCole	James.McCole@enerven.com.au	+61 451 081 909
Senior Electrical Engineer	SA Water	Sachin Pandey	Sachin.Pandey@sawater.com	+61 429 391 320

In addition, SA Water has experience with the operation and maintenance of embedded solar and battery generation systems having pre-existing installations at the Adelaide Desalination Plant, Hope Valley Water Treatment Plant, Crystal Brook Depot, Yatala Reverse Osmosis Plant and Yunyarinyi (Kenmore Park) facility in the APY region.



3.9. Quality of electricity produced/connection agreement

Is the electricity of an appropriate quality? Please provide a copy of the connection agreement that meets the Commissions technical requirements with the licensed operator of the relevant transmission or distribution network.

For multiple generating locations, please provide connection agreement for each site.

Yes – See Attachments

3.10. Registration with AEMO

Is registration with AEMO required for the generating plant? if so, please provide details.

Yes, Generation Registration is required with AEMO

3.11. Development Act approval

Has the licensee obtained approval under the *Development Act 1993* (SA)? Please provide details.

Yes – See Attachments

3.12. Risk Management

Provide confirmation and reasonable evidence that the licensee has identified the risks associated with the services it intends to provide and has established, utilizes and relies upon risk management systems and processes which are adequate, accurate and current to address those risks. Please provide a copy of the licensee's updated risk management strategy.

Within SA Water, there is a range of experience in the Australian wholesale electricity market. Within the management of wholesale generation into the National Electricity Market, volumetric risks associated with fixed price retail contracts and wholesale hedging required to manage retail exposures. SA Water has established a suite of trading settlements and risk management tools to support its operations in the electricity market.

SA Water also has extensive asset management capabilities, supported by comprehensive policies and procedures which will be employed in maintaining the generating facility in compliance with its generation licence.

Operational risks will be managed by SA Water staff at these Plants and will involve completing a HAZOP to ensure the generation system is safe to operate and completing a standard handover checklist to ensure all the necessary documentation is provided (manuals, drawings, and maintenance plans and defects list).

Relevant documents to support this process include:

- Practical Completions Checklist – Capital Delivery
- HMS - 003 Electrical Safety Hazard Management Standard
- SIG - 003 Electrical Safety HMS Implementation Guide

SA Water's corporate governance and risk management framework is summarised in the company's latest annual report.

A copy of SA Water's Energy Price Risk Management Policy is attached.

3.13. Licences held by the applicant in other Australian jurisdictions

Does the licensee hold, or has previously held, electricity and/or gas licences in other Australian jurisdictions? If "yes", please provide details. If a licence previously held has been suspended or cancelled, please provide details.

No

3.14. Previous unsuccessful licence applications in other Australian jurisdictions

Has the licensee applied for an electricity licence or equivalent in another Australian jurisdiction and not been issued with a licence? If “yes”, please provide details.

N/A

3.15. Licences held by associates of the applicant

Does any associate of the licensee (within the meaning of the Corporations Act) hold an electricity licence in South Australia or in other Australian jurisdictions? If “yes”, please provide details.

Yes - License no. PGE157559

3.16. Compliance program

Please provide a copy of your Compliance Program which details what compliance systems you have in place and a description of how these systems will ensure compliance with the applicable regulatory obligations imposed by a licence.

The installation of the generation assets at the SA Water facilities will adhere to the SA Water Corporate Compliance Framework, with the Compliance Program Guide attached as reference

- **Compliance Program Guide**

3.17. Additional information

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

Click here to type.

3.18. Factors specified in the Essential Services Commission Act 2002

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

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

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

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4. Declaration

All information in this application must be verified by a Statutory Declaration of the licensee, in accordance with the provisions of the *Oaths Act 1936 (SA)*¹, stating that the information contained in the application is true and correct to the best of the licensee's knowledge, information and belief.

In conjunction with this declaration, evidence of the relevant authority of the declarant to sign on behalf of the applicant must also be provided to the Commission.²

Statutory Declaration

I Annette Westley
Of SA Water

do solemnly and sincerely declare that the information contained in this Application 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 20/4/2021

Signature [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: Adelaide this 20th day of April 2021

Before me: [Signature]

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

ANDREW FRANK MORECROFT
A COMMISSIONER FOR TAKING AFFIDAVITS IN
THE SUPREME COURT OF SOUTH AUSTRALIA

¹ Or equivalent legislation in other Australian jurisdictions.

² The Commission will accept a copy of a Board or Council minute (or circulating resolution) giving approval for the declarant to sign on behalf of the applicant as evidence of the relevant authority.

5. Checklist

Please ensure you have attached copies of the following documents:

<input checked="" type="checkbox"/>	Corporate structure diagram	3.3
<input checked="" type="checkbox"/>	Audited profit and loss statements all balance sheets for the last three financial years (<i>if applicant is a subsidiary, please provide for parent company</i>)	3.6
<input checked="" type="checkbox"/>	Director's declaration that financial statements comply with accounting standards etc.	3.6
<input checked="" type="checkbox"/>	Director's report and the audit opinion	3.6
<input checked="" type="checkbox"/>	Business Plan (include strategic direction and objectives, identified opportunities in the market place and forecasted results)	3.6
<input checked="" type="checkbox"/>	Contractual Arrangements (e.g. alliance, associated and/or establishment contracts) that define relationships within the group (<i>if applicable</i>)	3.7 and 3.8
<input checked="" type="checkbox"/>	Connection Agreement (for each location if multiple sites)	3.9
<input checked="" type="checkbox"/>	Development approval (for each location if multiple sites)	3.11
<input checked="" type="checkbox"/>	Risk management strategy	3.12
<input checked="" type="checkbox"/>	Compliance Program	3.16
<input checked="" type="checkbox"/>	Any other documents that may assist in supporting the application	3.17
<input checked="" type="checkbox"/>	Evidence of the relevant authority of the declarant to sign on behalf of the body corporate (<i>if applicable</i>)	4
<input checked="" type="checkbox"/>	Details of multiple generating plants – Connections agreements and Development approvals (<i>if applicable</i>)	Appendix 1
<input checked="" type="checkbox"/>	List of attachments documents that that are inclusive to Generation License Submission	Appendix 2

Appendix 1 – For multiple Generating plant locations

	Location of services	Details of services (type of generating plant including size, type of equipment etc)	NSP / Connection agreement attached	Development approval attached	Generation Classification
1	Happy Valley Water Treatment Plant	<p>Name Plate Capacity: 16.518 MVA</p> <p>Generating Capacity: 16.518 MVA</p> <p>Export Capacity: 8.37 MW</p> <p>Generation Type: Various</p> <p>Connection:</p> <ul style="list-style-type: none"> 37,895 x 380W JA solar JAM72S01-380/PR ground mounted N/E tracking panels 4 x 2.75MVA (SMA Sunny Central 2750) inverters 5.518MVA (4.41MW) Tesla Powerpack Systems comprising of: 5 x 0.64167 kVA and 4 x 0.57750 kVA Tesla Powerpacks 	SAPN / No *	Yes	Semi Scheduled
2	Christies Beach Waste Water Treatment Plant	<p>Name Plate Capacity: 7.04 MW</p> <p>Generating Capacity: 7.04 MW</p> <p>Export Capacity: 7.04 MW</p> <p>Generation Type: Various</p> <p>Connection:</p> <ul style="list-style-type: none"> 3,054 x 330 W JA Solar JAP6(k) ground mounted panels 9,240 x 380W JA solar JAM72S01-380/PR ground mounted panels 1 x 2.75MVA (SMA Sunny Central 2750) Inverter 1 x 1.08MVA Fronius Inverter 2.631MVA (2.146MW) Tesla Powerpack Systems comprising of 1 x 2.16MW Tesla Powerpacks 	SAPN / No *	Yes	Semi Scheduled

		<ul style="list-style-type: none"> • 1 x 0.83 MVA (0.661MW) Biogas Generator • 2 x 1.25MVA (0.99MW) Diesel Generator • 1 x 0.9MVA (0.714MW) Diesel Generator 			
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Note:

*Final SAPN / Electranet Connection Agreements will be supplied to ESCOSA after GPS has been approved by AEMO and 5.3.4 A & B letters have been issued.

Appendix 2 – Attachments

SA Water Corporate Attachments

- SAW Strategy 2040 Directions Paper
- Asset Management Policy
- Energy Price Risk Management Policy
- ESCOSA Generation License Supporting Organisational Capabilities
- Compliance Program Guide
- HMS – 003 Electrical Safety Hazard Management Standards
- SIG – 003 SAW Electrical Safety HMS Implementation Guide
- Practical Completions Checklist – Capital Delivery
- ElectraNet Master Terms Agreement

Contractor Certifications Attachments

- Enerven – SAI Global Certifications
- Enerven Certificate of Registration
- Enerven – Environmental and Quality Management Systems Certifications

Generator Attachments

- Development Approval or Exemptions
- SA Power Networks SA Water Generation System Connection Engineering Report
- SAPN Network Approval Offer
- Connection Agreement Finalised after
- Single Line Diagrams Drawings
- AEMO Generator Performance Standards