



EGLINTON VILLAGE ENERGY PTY LTD

ACN 665 916 085

APPLICATION TO THE ECONOMIC REGULATION AUTHORITY

FOR AN AMENDMENT TO RETAIL LICENCE ERL33 AND DISTRIBUTION LICENCE EDL10

REDACTED AND SUMMARISED FOR PUBLIC CONSULTATION

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1 BACKGROUND TO THIS APPLICATION FOR AMENDMENT

Eglinton Village Energy Pty Ltd (ACN 665 916 085) (“EV-Energy”) was granted an electricity retail licence (ERL33) and an electricity distribution licence (EDL10) on 2 August 2023 with an expiry date of 2 August 2052. This application is to amend the Licence Area (as defined in Section 2.5 of the Licences) to include three additional areas of land (Expanded Areas) to both licences as detailed in Section 2.4:

- The Muchea Industrial Park
- The Busselton Gateway Airport Industrial Park
- The Busselton HomeHQ.

EV-Energy continues to retail electricity to customers at the existing Eglinton Village Microgrid (**EV-Microgrid**). EV-Energy is looking to establish electricity microgrids and retail electricity to customers at the Muchea Industrial Park (**MIP-Microgrid**), Busselton Gateway Airport Microgrid (**BGAIP-Microgrid**) and the Busselton Home HQ Microgrid (**BHHQ-Microgrid**) on the land covered by the Expanded Areas as shown on the plan in Attachments x and y. Together these microgrids will form the business and obligations relating to the proposed amended Licence and will add an estimated 388 customers, 12MW of peak load and \$[redacted] million of normalised EBITDA to the business. The business of EV-Energy will continue to comprise (albeit across a larger area):

- embedded electricity networks and related infrastructure, including metering infrastructure (**Distribution Networks**);
- connection to the South-West-Interconnected-System (SWIS) (**SWIS Connection Points**);
- embedded generation and battery storage infrastructure (**Embedded Generation and Storage Assets**) (not part of the Distribution Networks or covered by the Distribution Licence EDL10); and
- retailing of electricity to commercial and residential customers.

The Expanded Areas will service and facilitate the activation of three new land developments and associated Distribution Networks and retail electricity customers:

1. The Muchea Industrial Park (**MIP**), a new industrial development in Muchea, Western Australia, which is being led by Lester Property Group (**LPG**) as part of an investment vehicle which will



develop the estate (**MIP Land Developer**). Lester Property Group is a private, multi-generational property investment and development firm with over 30 years of experience across commercial, industrial, residential, and lifestyle projects. The group operates both directly and via managed syndicates, underpinned by its own licensed financial services entity;

2. the Busselton Gateway Airport Industrial Park (**BGAIP**), a new industrial development in Busselton, Western Australia, which is being led by Satterley Property Group (**SPG**), as part of an investment vehicle which will develop the estate (**BGAIP Land Developer**). SPG is Australia's second largest property developer with a current landbank of 25,000 lots and development value of over \$10 billion; and
3. the Busselton HomeHQ (**BHHQ**), a new commercial retail precinct development in Busselton, Western Australia, which is being developed by Arise Developments (**AD**), as part of an investment vehicle which will develop the estate (**BHHQ Land Developer**). AD is a privately owned property developer based in Subiaco, Western Australia, established in 2019. The company focuses on large-format retail and industrial land developments, with notable projects including Joondalup Square, Rockingham Central, and the proposed \$170 million Busselton HomeHQ. AD is Australia's 11th largest developer of large format retail precincts.

In all of the above developments, capacity constraints in the local Western Power / SWIS network make the timely activation of each development otherwise uneconomic if not for the approach taken by EV-Energy and its deployment of the licenced microgrid model utilising on-site generation and storage assets to supplement otherwise limited SWIS grid capacity.

2 APPLICATION SUMMARY

2.1 Applicant Details

Eglinton Village Energy Pty Ltd (ACN 665 916 085) (**EV-Energy**), is an Australian Proprietary Limited Company that was registered on 21 February 2023.

EV-Energy was granted an Electricity Distribution Licence (EDL10) and an Electricity Retail Licence (ERL33) on 2 August 2023, together the EV-Energy Licences.



The ownership of EV-Energy remains unchanged since the EV-Energy Licences were granted. EV-Energy is 100% owned by Zenith Connected Energy (ZCE) (previously named Zenith Micro-grid). ZCE is also the sole owner of the ERA licenced Peel Renewable Energy Pty Ltd (**Peel Renewable Energy**), with Electricity Distribution License (**EDL7**) and Electricity Retail License (**ERL28**) granted on 5 March 2020, and Ocean Reef Renewable Energy Pty Ltd (**Ocean Reef Renewable Energy**), with Electricity Distribution License (**EDL9**) and Electricity Retail License (**ERL32**) granted on 25 May 2023.

EV-Energy continues to leverage the organisational infrastructure and policies of the ZCE group as well as the resources and financial support of the broader Zenith Energy group of companies.

2.2 Proposed Amendment to Services

Under this application EV-Energy proposes to add the respective ownership and operations of the MIP-Microgrid, the BGAIP-Microgrid and the BHHQ-Microgrid to its existing operating services portfolio (currently the ownership and operation of the EV-Microgrid). EV-Energy, via these new Microgrids, will supply electricity to an estimated 388 new industrial and commercial customers across an estimated 252 green-titled lots located within the Expanded Areas.

2.3 Proposed Addition to Service Infrastructure/works

The following infrastructure (together the **Microgrid**) and works will be undertaken and utilised by EV-Energy to deliver the proposed amended electrical distribution services to customers within each new land development/Expanded Areas:

- Grid Connection Point to be constructed by each Land Developer
- Distribution Network downstream of the Grid Connection Point, designed by UPD and to be constructed by the respective Land Developer under the proposed amended EV-Energy distribution licence (EDL10);
- Switchgear, protection and communication equipment to be installed at the Grid Connection Point, consistent with EV-Energy's Asset Management Strategy;
- Embedded Generation Assets (not part of the Distribution Networks or covered by the distribution licence EDL10) in the form of roof-top and / or ground mounted solar



installations designed and constructed by EV-Energy on land to be leased under a Generation Lease Agreement with the Land Developer (refer to Section 5);

- Embedded Storage Assets (not part of the Distribution Networks or covered by the distribution licence EDL10) and control system designed and constructed by EV-Energy.

2.4 Expanded Areas / Amended Supply Area

The proposed amendment covered by this application is to add the Expanded Areas comprising the new land developments to the licence supply area of the EV-Energy retail licence ERL33 and distribution licence EDL10.

The Expanded Areas / each land development is located within the defined supply area of the South-West Interconnected System (SWIS).

The Expanded Areas encompasses a total development area of 329ha comprising:

I) MIP Expanded Area

140ha of industrially zones land situated on the north-west edge of the Perth metropolitan area, at the intersection of the Brand and Great Northern highways. The Western Australian Planning Commission granted approval for the Stage 3 subdivision of this land on 26 March 2024.

II) BGAIP Expanded Area

165ha of industrially zoned land situated on the western edge of the Busselton Airport on the outskirts of the City of Busselton. The Western Australian Planning Commission granted approval for the Stage 1a subdivision of this land on 10 January 2025.

III) BHHQ Expanded Area

24ha of commercial and industrially zoned land situated on the southern edge of Busselton. The Western Australian Planning Commission most recently granted approval for the subdivision of this land on 3 July 2025;



2.5 Other Regulatory Approvals

Please note that EV-Energy is already and continues to be a member of the WA Energy Ombudsman Scheme.

2.6 Public Interest

Granting EV-Energy an amendment to its retail and distribution licences, in particular expanding its supply area, would not be contrary to the public interest because the addition of the new Microgrids:

- enable timely and cost-effective activation of industrial land in and around Busselton in a manner that will contribute to growth, business and employment opportunities in WA's South-West region. In the case of Muchea, the new Microgrid drives similar benefits and unlocks development of Perth's northern gateway. Without the new Microgrids, the respective parcels of land will not be developed in the near to medium term due to insufficient capacity being currently available in the existing Western Power network and the cost and time impost otherwise needed to add the required Western Power capacity to each development which is prohibitive to the development proceeding;
- ensures customers of the new Microgrids will be equal or better off than if they were connected directly to the Western Power distribution network with respect to:
 - reliability and safety of supply;
 - the cost and renewable content of supply that they can participate in; and
 - the ability to choose alternate retailers.
- is in line with WA's state development strategy to build sustainable renewable energy sources and battery storage assets and as such is in the interest of all WA citizens and businesses;
- will assist in managing the challenges of peak energy demand and low energy demand through the installation of solar and storage infrastructure that will reduce and/or defer future SWIS network augmentation arising from electrification;



- will not impose additional cost or loss of revenue to the existing electricity distributors in WA (in the case of BGAIP and BHHQ where they are new greenfield developments) and therefore no additional cost burden on WA taxpayers or existing consumers. Via the local Grid Connection Points, these Microgrids will become new customers and generate new revenue for Western Power, AEMO and SWIS retailers;
- will reactivate the MIP, an existing land development established to service the northern gateway both in and out of the Perth metropolitan area but where new lot creation and related economic growth has been stalled for several years due to lack of capacity being available in the Western Power network. The MIP Microgrid allows Western Power to be a part of a fit-for-purpose solution, utilising / maximising the remaining capacity in the SWIS network without the need for new material public / state investment in power infrastructure; and
- will, by way of facilitating the expansion of the operations of an existing licenced entity, help ensure the sustainability of (and the promotion of competition from) a small, licenced business particularly with regards to spreading the fixed costs of mandatory ERA audits, reviews and general compliance costs associated with being a licenced entity.

3 CORPORATE INFORMATION (UNCHANGED)

3.1 Company detail (unchanged)

Eglinton Village Energy Pty Ltd, ACN 665 916 085 (**EV-Energy**)

Registered Office: 52 Belmont Avenue, Rivervale, Western Australia 6103

Head Office Telephone: 08 9416 2000

Business Address: 52 Belmont Avenue, Rivervale, Western Australia 6103

Primary Contact Person: Rob Breden

Email: robbreden@zenithenergy.com.au

Contact Number: 0431 828 550



Eglinton Village Energy was registered on 21 February 2023.

EV-Energy is a wholly owned subsidiary of Zenith Connected Energy (previously named Zenith Micro-Grid). ZCE currently has team of 11 staff dedicated to the ownership and operation of the licenced microgrid businesses, including EV-Energy. ZCE has a General Manager who reports directly to the Chief Operating Officer of Zenith Energy.

3.2 Type of Company (unchanged)

Eglinton Village Energy Pty Ltd is an Australian proprietary limited company with Australian Company Number 665 916 085.

3.3 Directors (unchanged)

- William Douglas Walker
- Hamish Robert Moffat
- Timothy Christian Cipolloni

3.4 Ownership (unchanged)

Eglinton Village Energy Pty Ltd is a wholly owned subsidiary of Zenith Connected Energy (previously named Zenith Micro-Grid) Pty Ltd (ACN 140 688 679) ('ZMG') which, in turn, is wholly owned by Zenith Energy Operations Pty Ltd (ACN 091 534 637) ('ZEO').

3.5 Declarations

A declaration, in the prescribed format, certifying that the information provided in this application is correct is also attached to this application.



4 FINANCIAL INFORMATION

4.1 Current Financial Position

EV-Energy has not been required to prepare and lodge audited financial statement with the Australian Securities and Investments Commission (ASIC). Copies of Elemental HoldCo Pty Ltd's (the Ultimate Parent of ZPPL) Audited Financial Statements for Financial Years 2023 and 2024 (2020, 2021, and 2022 provided previously) are attached to this application together with the auditor reports and solvency reports.

The following section is Commercial in Confidence

4.2 Financing

The following section is Commercial in Confidence

4.3 Expanded Areas Financial Projections

The following section is Commercial in Confidence

4.4 Expanded Area Customer Pricing / Financial Policies

Each of the MIP, BGAIP and BHHQ Microgrids will offer industrial and commercial customers electricity supply at bundled rates equal to or better than published regulated bundled tariffs on the SWIS i.e., they will be no worse off than at any other standard location within the SWIS. Contestable Customers will also be able to choose and negotiate unbundled tariffs directly with EV-Energy. The Customer Connection and Contribution Guidelines and Policies of the licensee's Microgrids will be published on the respective websites for each of the EVE, MIP, BGAIP and BHHQ Microgrids.

5 EXPANDED AREAS TECHNICAL INFORMATION

A summary of the Expanded Areas and Physical Environment, Microgrid Construction Activities and Schedule, Microgrid Embedded Generation and Storage Assets and Metering Arrangements and Forecast Demand for the respective MIP, BGAIP, and BHHQ developments is provided below:



5.1 MIP Development

5.1.1 MIP Physical Environment

The proposed development of the MIP Expanded Area is being led by the Lester Property Group (LPG), as part of an investment vehicle which will develop the estate (MIP Land Developer). Lester Property Group is a private, multi-generational property investment and development firm with over 30 years of experience across commercial, industrial, residential, and lifestyle projects. The group operates both directly and via managed syndicates, underpinned by its own licensed financial services entity. LPG are in the process of acquiring the land (on behalf of the MIP Land Developer) pertaining to the MIP Expanded Area.

The MIP Expanded Area site is situated in the northern corridor of metropolitan Perth adjacent to the recently upgraded Northern Highway roads expansion. When fully developed the MIP will consist of approximately 41 industrial lots and be home to an estimated 41 businesses. Development of the MIP commenced in 2019 with release Stage 1 and 2 connected to the Western Power SWIS network. Further development using a traditional servicing approach has been constrained by the lack of capacity in the Western Power network. The undeveloped part of MIP encompasses 125ha of land currently sitting across 4 titles being on Lots 9007, 82 and 83 on Deposited Plan 427129. There are no encumbrances impacting the development of the land. The development site is currently vacant. The estate is proposed to be developed between 2025 and 2028. Stage 3, comprising 8 lots, will be pre-sold in 2025/26 with businesses and first customers expected to commence operations in September 2026. Stage 4, comprising 18 lots will be released in 2026. The latest sub-division plan for the precinct as approved by the WAPC, including the current staging plan is provided in Attachment x.

LPG / the MIP Land Developer will secure the requisite development approval from the Shire of Chittering in order to proceed with the development. Civil works on the site will commence in 2026.

5.1.2 MIP-Microgrid Infrastructure

The Distribution Network of the MIP-Microgrid, when constructed and commissioned, will comply with all aspects of all applicable Western Power schemes and policies, including the Underground Distribution Schemes (UDS) Manual (version 11) issued by Western Power and AS/NZS 3000, AS 2067, WAER, WASIR and other applicable standards.



The site substation and switching gear has been designed and will be constructed to meet the applicable Western Power standards at the relevant time as outlined in the Distribution Substation Manual Section 3 and associated Standards.

The Distribution Network will commence from the Grid Connection Point which is situated on the MIP-Microgrid's side of the Western Power Meter. A connection application will be made to Western Power as per the details and activities in 5.3.3 below.

The following section, including sub-sections, is Commercial in Confidence

5.1.3 MIP-Microgrid Construction Activities and Schedule

5.1.4 MIP-Microgrid Embedded Generation and Storage Assets (not part of the Distribution Network or to be covered by the Distribution Licence EDL10)

5.1.5 MIP-Microgrid Metering Arrangements and Forecast Demand

The following section, including sub-sections, is Commercial in Confidence

5.2 BGAIP Development

5.2.1 BGAIP Physical Environment

The development of the BGAIP Expanded Area is being led by Satterley Property Group (**SPG**), as part of an investment vehicle which will develop the estate (**BGAIP Land Developer**). SPG was established in 1980 and is now Australia's second largest property developer with a current landbank of ~25,000 lots and development value of over \$10 billion.

The BGAIP Expanded Area site is situated next to the Busselton Airport on the outskirts of the City of Busselton. When fully developed the BGAIP will consist of approximately 79 industrial lots and be home to an estimated 100 businesses. The BGAIP encompasses 165ha of land currently sitting across



2 titles being Lots 76 and 9000 on Deposited Plans 410411 and 428884 respectively. The northern spur of lot 9000 is excluded from the proposed licence area and may be developed as residential land in the future. There are no encumbrances impacting the development of the land. The development site is currently vacant, having previously been used for rural grazing purposes. The estate is proposed to be developed between 2025 and 2049. Stage 1, comprising 35 lots, has been pre-sold with businesses and first customers expected to commence drawing power in June 2026. The latest sub-division plan for the precinct as approved by the WAPC, including the current staging plan is provided in Attachment x.

SPG has secured the requisite development approval from the City of Busselton in order to proceed with the development. General civil earthworks on the site commenced in April 2025.

*****The remainder of this section is Commercial in Confidence*****

5.2.2 BGAIP-Microgrid Infrastructure

The Distribution Network of the BGAIP-Microgrid, when constructed and commissioned, will comply with all aspects of all applicable Western Power schemes and policies, including the Underground Distribution Schemes (UDS) Manual (version 11) issued by Western Power and AS/NZS 3000, AS 2067, WAER, WASIR and other applicable standards.

The site substation and switching gear will be designed and constructed to meet the applicable Western Power standards at the relevant time as outlined in the Distribution Substation Manual Section 3 and associated Standards.

The Distribution Network will commence from the Grid Connection Point which is situated on BGAIP-Microgrid's side of the Western Power Meter. A connection application will be made to Western Power as per the details and activities in 5.1.3 below.

*****The following section, including sub-sections, is Commercial in Confidence*****

5.2.3 BGAIP-Microgrid Construction Activities and Schedule



5.2.4 BGAIP-Microgrid Embedded Generation and Storage Assets (not part of the Distribution Network or to be covered by the Distribution Licence EDL10)

5.2.5 BGAIP-Microgrid Metering Arrangements and Forecast Demand

5.3 BHHQ Development

5.3.1 BHHQ Physical Environment

The development of the BHHQ Expanded Area is being led by Arise Developments (AD), as part of an investment vehicle which will develop the estate (**BHHQ Land Developer**). AD, a privately owned property developer based in Subiaco, Western Australia, established in 2019. The company focuses on large-format retail and industrial land developments, with notable projects including Joondalup Square, Rockingham Central, and the proposed \$170 million Busselton HomeHQ. AD is Australia's 11th largest developer of large format retail precincts.

The BHHQ Expanded Area site is situated on the eastern corridor of the City of Busselton and comprises 15ha of land on lot 805 on Deposited Plan 426477. The development will consist of three large format retail lots (Lots 1-3) that will house 24 commercial tenants and 12 separate green-title commercial/light industrial lots (Lots 4-15).

The estate is proposed to be developed between 2025 and 2027. All lots will be developed in parallel and 17 tenancies of 37 lots or tenancies have been pre-sold and pre-leased with businesses and first customers expected to commence operations in July 2027. The latest sub-division plan for the precinct as approved by the WAPC, including the current staging plan is provided in Attachment x.

*****The remainder of this section is Commercial in Confidence*****

5.3.2 BHHQ-Microgrid Infrastructure

The Distribution Network of BHHQ-Microgrid, when constructed and commissioned, will comply with all aspects of all applicable Western Power schemes and policies, including the Underground



Distribution Schemes (**UDS**) Manual (version 11) issued by Western Power and AS/NZS 3000, AS 2067, WAER, WASIR and other applicable standards.

The site substation and switching gear has been designed and will be constructed to meet the applicable Western Power standards at the relevant time as outlined in the Distribution Substation Manual Section 3 and associated Standards.

The Distribution Network will commence from the Grid Connection Point which is situated on BHHQ-Microgrid's side of the Western Power Meter. A connection application will be made to Western Power as per the details and activities in 5.2.3 below.

*****The following section, including sub-sections, is Commercial in Confidence*****

5.3.3 BHHQ-Microgrid Construction Activities and Schedule

5.3.4 BHHQ-Microgrid Embedded Generation and Storage Assets (not part of the Distribution Network or to be covered by the Distribution Licence EDL10)

5.3.5 BHHQ-Microgrid Metering Arrangements and Forecast Demand



5.4 Technical information relating to all microgrids

The following items are applicable to each MIP, BGAIP and BHHQ. Expanded Areas developments and the respective Microgrids:

- Microgrid Distribution Network Handover Process;
- Asset Management System; and
- Customer Information

5.5 Expanded Areas Microgrid Distribution Network Handover Process

When construction of the Microgrid Distribution Network and the Grid Connection Point has been completed EV-Energy will complete a pre-handover inspection in accordance with section 6.2.2.10 of the UDS.

On completion of a satisfactory handover inspection, the Land Developer will provide EV-Energy with a certificate consistent with that prescribed in clause 6.2.2.11 of the UDS (**Handover Certificate**) and all records, plans, documents in the possession or under the control of the Land Developer that relate to the design, construction or testing of the BGAIP-Microgrid consistent with the requirements of the UDS together with any other relevant information.

The Land Developer will then hand over the respective Microgrid Distribution Network and the Grid Connection Point to EV-Energy who will assume ownership of, operate and maintain that Microgrid.

The following Section, including sub-sections is Commercial in Confidence

5.6 Asset Management System

5.6.1 Delivery Deed Documentation

5.6.2 Retail Services and Distribution Network Documentation (unchanged)



5.7 Customer information

5.7.1 Approach to the management of customer accounts

Where applicable, EV-Energy will continue to manage customer accounts in accordance with the Code of Conduct For The Supply Of Electricity To Small Use Customers 2022 (Code of Conduct) issued under Part 6 of the *Electricity Industry Act 2004* (where small use customers apply), together with obligations including but not limited to: the *Fair Trading Act 2010* (WA), the *Spam Act 2003* (Cth), the *Spam Regulations 2004* (Cth), the *Do Not Call Register Act 2006* (Cth), the *Telecommunications (Do Not Call Register) (Telemarketing and Research Calls) Industry Standard 2007* (Cth) and the *Privacy Act 1988* (Cth), and the Australian Privacy Principles; and the Australian Consumer Laws (as set out in Schedule 2 to the *Competition and Consumers Act 2010* (Cth)).

EV-Energy (and service provider) uses a compliance management system to set out how it complies with the above regulations, informed by the Australian standard, ISO 19600:2015. The objective of the CMS is to ensure that the company adheres to the requirements of laws, industry and organizational standards and codes, the principles of good governance and accepted community and ethical standards.

From a practical point of view, EV-Energy's retail functions are managed by ZCE's service provider dedicated Customer Service Team who manages ZCE's customer billing services across its microgrid businesses in Western Australia. Policies, procedures, resources, and information are drawn from this centralized function to provide dedicated support to the delivery of effective and compliant retail services for customers of the EV-Energy's Microgrids, including the for the Expanded Areas.

*****The remainder of this section has been removed for brevity*****

5.7.2 Ombudsman (unchanged)

As required of retail and distribution licence holders in accordance with clause 101 of the Electricity Act, EV-Energy has been a member of the Energy and Water Ombudsman Western Australia since it obtained its retail licence.



5.7.3 Policies and Procedures (unchanged)

The existing policies and procedures of EV-Energy will apply to the Expanded Areas as part of any amendment to EV-Energy's distribution (EDL 10) and retail (ERL 33) licences.

5.7.4 Customer tariffs and charges

Under the respective Development Deeds, EV-Energy is required to offer Microgrid customers a tariff regime that results in total variable costs for the supply of electricity that are, on an annual basis, at least equal to or lower than the costs that would otherwise be incurred under the equivalent published regulated bundled tariffs for which a customer would be eligible if part of the SWIS.

EV-Energy will offer Microgrid Customers and publish the following default tariffs on the Expanded Area Microgrids' websites:

- “Anytime” tariffs that correspond to the L3 regulated tariffs (or their successors);
- “Time of use” tariffs that correspond to the R1 and R3 regulated tariffs (or their successors);
- tariffs for streetlights and unmetered supply, consistent with the applicable regulated tariffs.

The default published tariffs will be revised annually at the same time of year that the regulated bundled tariffs are published.

The existing EV-Energy Complaints Handling Policy will also apply to customers of the Expanded Area Microgrids.

5.8 Relevant experience

5.8.1 Eglinton Village Energy Entities

EV-Energy is part of the ZCE Group of three existing licenced microgrid companies / entities, which in turn is part of the broader Zenith Energy Group, as summarised below. EV-Energy will continue to draw on the relevant experience of ZCE Key People.

5.8.2 EV-Energy

EV-Energy obtained its retail and distribution licences in August 2023 and operates, distributes and retails electricity to customers at the EV-Microgrid. EV-Energy, as part of Zenith Energy, is also able



to draw on the expertise and knowledge from related entities (inclusive of Peel Renewable Energy and Ocean Reef Renewable Energy) who have many years of experience in the design, construction and operation of electricity generation and distribution networks.

Subject matter experts from EV-Energy's related entities and their established third-party experts will be seconded to provide support to EV-Energy during the design, construction, and commissioning phases of new and existing project. The asset, safety, compliance and network operations teams as well as customer, corporate services and finance teams will also provide ongoing support to the long-term operation of the existing and Expanded Areas Microgrids.

5.8.3 Peel Renewable Energy

Peel Renewable Energy Pty Ltd is licensed for electricity distribution (EDL7) and retail (ERL28) within Lot 600 at the Peel Business Park by the Economic Regulatory Authority. Peel Renewable Energy operates a 22kV distribution network that includes substation and connection points, which presently supplies 12 connected industrial customers. Peel Renewable Energy Genco Pty Ltd presently has 1.2MWac solar and 2.5MWh of Battery Energy Storage in operation. Peel Renewable Energy Genco Pty Ltd provides electricity to Peel Renewable Energy Pty Ltd subject to a Power Purchase Agreement. The balance of energy is imported from the SWIS. Peel Renewable Energy Pty Ltd is subject to a 25-year Project Deed countersigned by DevelopmentWA, which includes covenants to supply 50% Renewable Electricity and provide a reduction of 30% on the relevant regulated tariffs of tenants.

5.8.4 Ocean Reef Renewable Energy

Ocean Reef Renewable Energy Pty Ltd is licensed for electricity distribution (EDL9) and retail (ERL32) by the Economic Regulatory Authority at the Ocean Reef Marina development being undertaken by DevelopmentWA. Ocean Reef Renewable Energy Pty Ltd is subject to a 25-year Project Deed countersigned by DevelopmentWA, which includes covenants to supply 50-65% Renewable Electricity and provide a reduction of 30% on the relevant regulated tariffs of tenants. As at the date of this application the construction of stage 1 of the Ocean Reef Marina distribution network has been completed and has been handed over to Ocean Reef Renewable Energy (June 2025) for ownership and operation. First customers are yet to connect and commence supply.



5.8.5 Zenith Energy Pty Limited

Zenith Energy Pty Limited ('Zenith Energy') is the owner of Zenith Connected Energy (encompassing Peel Renewable Energy, Ocean Reef Renewable Energy and EV-Energy licensed microgrid businesses). In addition, Zenith Energy has its Independent Power Provider (IPP) business where it operates over a dozen separate remote generation and microgrid assets across Western Australia and the Northern Territory, providing currently contracted and operational capacity of approximately 500MW to a diversified mix of customers. Zenith Energy is headquartered in Perth with a further service support centre located in Cairns. Zenith Energy's core team has designed, built, operated, and maintained over 60 power stations across Australia.

*****The following section is Commercial in Confidence*****

5.8.6 Key Contractors

Consistent with its existing operations, EV-Energy will continue to leverage off an established core group of key contractors as well as engaging fit-for-purpose new contractors to establish, own and operate the Expanded Areas/Microgrids relating to the proposed amendment to its distribution licence.

5.8.6.1 HV and LV network services

5.8.6.2 Customer Relationship Management Service Provider

5.8.6.3 Metering Services

5.9 Summary of Other Equivalent Licences and Approvals

The Zenith Connected Energy group of companies include the following entities that are either authorised, licensed or exempt retailers or distributors:



Peel Renewable Energy Pty Ltd (ACN 634 578 206): ERA WA licensed retailer and distributor operating at Lot 600 of the Peel Business Park (Nambeelup Kaadajan), subject to licenses ERL28 and EDL7.

Ocean Reef Renewable Energy Pty Ltd (ACN 663 110 987): ERA WA licensed retailer and distributor operating at the Ocean Reef Maria development, subject to licenses ERL9 and EDL32.

The following section is Commercial in Confidence

5.9.1 Other regulatory approvals

EV-Energy will commence the process of applying to the City of Busselton for development approval to build and operate the storage and interconnection of the BGAIP and BHHQ subdivisions and the Shire of Chittering for the MIP subdivision.

6 PUBLIC INTEREST INFORMATION

In summary, the Expanded Area Microgrids are not contrary to the public interest and provides the following:

6.1 Environmental benefits

Provides for a renewable energy content meaningfully higher than otherwise available in the SWIS for all electricity consumed within the Expanded Area Microgrids.

6.2 Economic and regional benefits

- Enables timely and cost-effective activation of industrial land in and around Busselton in a manner that will contribute growth, business and employment opportunities in WA's South-West region. Without the BGAIP and BHHQ Microgrids these parcels of land will not be developed in the near-medium term due to insufficient capacity being currently available in the existing Western Power network and the cost and time impost otherwise needed to add the required Western Power capacity being prohibitive to the developments going ahead;



- In the case of the MIP, reactivates a stalled existing land development established to service the northern gateway both in and out of the Perth metropolitan area but where new lot creation and related economic growth has been on hold for several years due to lack of capacity being available in the Western Power network. The MIP Microgrid allows Western Power to be a part of a fit-for-purpose solution, utilising / maximising the remaining capacity in the SWIS network without the need for new material public / state investment in power infrastructure.
- Establishes a model for addressing the peak distribution network usage issues through the investment in appropriate Distributed Energy Resources, thereby avoiding the future upgrade costs to networks;
- Establishes a model for addressing the system low event issues through the investment in appropriate Distributed Energy Resources, thereby mitigating the risks associated with the distribution network in these system low events;

6.3 Customer benefits

- Ensures the cost of electricity will be equal to or lower than if the customer was directly connected to the Western Power network
- Offers security and reliability of supply including through on-site embedded solar generation;
- Provides customers with a comparable or better choice of retailer
- Provides customers with a comparable level of consumer protection

6.4 Competitive benefits

- Ensures a comparable level of retail competition and consumer protection;
- Promotes growth, competition and the efficient use of the Western Power Network;
- Will, by way of facilitating the expansion of the operations of an existing licenced entity, help ensure the sustainability of (and the promotion of competition from) a small, licenced business particularly with regards to spreading the fixed costs of mandatory ERA audit, reviews and general compliance costs associated with being a licenced entity.



6.5 Policy objectives met

- Enables activation and development of industrial land complementary to both local and State government growth initiatives for Busselton and the overall South-West region and the Perth-metro northern corridor;
- Achieves Land Developer objectives relating to sustainable developments.

7 ATTACHMENTS

The following attachments are Commercial in Confidence

