Economic Regulation Authority

Decision on electricity generation licence

Narrogin Wind Farm Pty Ltd as trustee for the Narrogin Wind Farm Trust

11 September 2026

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Acknowledgement of Country

At the ERA we value our cultural diversity and respect the traditional custodians of the land and waters on which we live and work.

We acknowledge their continuing connection to culture and community, their traditions and stories. We commit to listening, continuously improving our performance and building a brighter future together.

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1. Introduction

In accordance with section 26(1)(g) of the *Economic Regulation Authority Act 2003* (ERA Act), this document presents the decision of the Economic Regulation Authority (ERA) regarding the electricity generation licence application from Narrogin Wind Farm Pty Ltd as trustee for the Narrogin Wind Farm Trust (Narrogin Wind Farm).

1.1 Decision

Pursuant to sections 9, 15 and 19 of the *Electricity Industry Act 2004* (Electricity Industry Act), the ERA grants electricity generation licence EGL34 to Narrogin Wind Farm for a period of 30 years, which is the maximum term allowable under section 15 of the Electricity Industry Act.

Subject to the licence terms and conditions, Narrogin Wind Farm is authorised to construct and operate electricity generation works in licence area plan ERA-EL-167.

As required by section 23(1) of the Electricity Industry Act, the ERA will publish a notice of the grant of the licence in the *Government Gazette* as soon as practicable.

2. Background

On 2 June 2026, Narrogin Wind Farm provided a complete application for an electricity generation licence to construct and operate the Narrogin Wind Farm project (NWF).

The NWF site is located approximately 160km south-east of Perth, 7km east of Williams and 9km west of Narrogin. Covering 6,344 hectares, the site comprises predominantly cleared land used for agriculture and livestock grazing with patches of woodland. The wind farm will consist of 23 wind turbine generators with a maximum total declared sent out capacity of 168 megawatts at its connection point to the South West Interconnected System (SWIS). It will connect to the SWIS via an existing 220 kilovolt transmission line that crosses the site's southern boundary, facilitated by the construction of approximately 5km of new transmission line.

Narrogin Wind Farm was established in 2025 as a special purpose vehicle to develop, finance, construct and operate the NWF. It is ultimately controlled by Brookfield Corporation, which acquired renewable energy developer Neoen SA in 2025. Neoen SA's wholly owned subsidiary, Neoen Australia Pty Ltd (Neoen), has led the project development of NWF.

Envision Energy Australia Pty Ltd has been contracted to supply and install the turbines and provide long term operations and maintenance services. A consortium of UGL and CPB Contractors, both subsidiaries of CIMIC Group, has been engaged to deliver civil and electrical construction works, including high voltage infrastructure. Neoen will provide construction project management and retain overall responsibility for operational and asset management services through a Managed Services Agreement.

Narrogin Wind Farm has signed a long-term power purchase agreement with Synergy. The wind farm is expected to start generating electricity in the fourth quarter of 2028.

2.1 Licence

Section 7 of the Electricity Industry Act requires a person to hold an electricity generation licence to construct or operate electricity generating works.

2.2 Public consultation

On 9 June 2026, the ERA sought public comment on a summary of Narrogin Wind Farm's application. No submissions were received during the 15–business day public consultation period.

2.3 Assessments

Under section 19(1) of the Electricity Industry Act, the ERA must grant a licence if it is satisfied that the licensee has and is likely to retain, or will acquire within a reasonable time, and is then likely to retain, the financial and technical resources to undertake the activities authorised, or to be authorised, by the licence.

The ERA engaged financial and technical consultants to examine the financial and technical capabilities of Narrogin Wind Farm to undertake the activities authorised by the licence.

Based on the information provided by Narrogin Wind Farm and the financial and technical assessments, the ERA considers that Narrogin Wind Farm meets the regulatory requirements to be granted an electricity generation licence.

2.3.1 Financial assessment

Narrogin Wind Farm is supported by Neoen Australia Holding Pty Ltd (known as BRHL Australia Pty Ltd until 13 August 2026), which is a related entity within the Brookfield corporate structure. It is considered that with the support of Neoen Australia Holding Pty Ltd and the wider corporate group, Narrogin Wind Farm will acquire within a reasonable time after the licence is granted, and is then likely to retain, the financial resources to undertake the activities to be authorised by the licence.

2.3.2 Technical assessment

Narrogin Wind Farm has engaged experienced global manufacturer of wind farm components, Envision Energy Australia Pty Ltd, to supply and install the wind turbine generators and for long-term operations and maintenance support; and a consortium of experienced UGL and CPB Contractors to deliver civil and electrical construction works, including high voltage infrastructure. It is considered that with the support of its contractors, the applicant has some resources and is likely to retain them and will acquire within a reasonable time after the grant, and is then likely to retain, the technical resources to undertake the activities authorised, or to be authorised, by the licence.

2.4 Assessment of public interest

The ERA has considered the matters set out in section 8(5) of the Electricity Industry Act, the matters set out in section 26(1) of the ERA Act, information provided by Narrogin Wind Farm, the financial and technical assessments, and the outcome of the public consultation process. The relevant matters set out in the Electricity Industry Act and the ERA Act are detailed below in sections 2.4.1 and 2.4.2.

Having regard to these matters, the ERA is satisfied that granting an electricity generation licence to Narrogin Wind Farm would not be contrary to the public interest.

In reaching this conclusion, the ERA noted the following:

- Narrogin Wind Farm conducted stakeholder and community engagement in developing the project, including consultation with the Shires of Narrogin and Williams, State and Federal Government agencies, local community members, landowners and Traditional Owner groups.
- The development application proposed a wind farm with permanent facilities including up to 25 turbines, a battery energy storage system, operations and maintenance buildings and a substation, and temporary facilities including an accommodation camp and concrete batching plant. The development application was approved by the Statutory Planning Committee at its meeting on 24 September 2025.
- The Shire of Narrogin welcomed the approval of the project on 30 September 2025 and flagged the need to consider the “cumulative impact of multiple renewable energy developments across Narrogin and surrounding districts”.
- The Narrogin Wind Farm intends to align with the Western Australian Government’s Community Benefits Guideline. Narrogin Wind Farm has committed to providing annual

community benefit contributions of $225,000 over the life of the project to support initiatives such as local employment and procurement opportunities, regional business growth, community infrastructure, and partnerships with Traditional Owners.

- The project is expected to contribute additional renewable energy generation capacity in Western Australia and will receive support through the Commonwealth Government's Capacity Investment Scheme.
- The Western Australian Government has designated the wind farm as a Priority Project, reflecting the Government's assessment of the project's strategic significance to State energy and economic development objectives.
- The ERA's own consultation process did not result in any submissions.

2.4.1 Electricity Industry Act 2004

Section 9 of the Electricity Industry Act requires that the ERA must not grant a licence unless it is satisfied that it would not be contrary to the public interest to do so. Section 9(2) of the Electricity Industry Act provides that, without limiting the other matters that may be taken into account, the ERA must take into account the matters referred to in section 8(5) of the Electricity Industry Act when determining whether granting a licence would be contrary to the public interest. Those matters are:

a. Environmental considerations.

b. Social welfare and equity considerations, including community service obligations.

c. Economic and regional development, including employment and investment growth.

d. The interests of customers generally or of a class of customers.

e. The interests of any licensee, or applicant for a licence, in respect of the area or areas to which the licence in respect of which the power exercised is exercised would apply.

f. The importance of competition in electricity industry markets.

g. The policy objectives of government in relation to the supply of electricity.

2.4.2 Economic Regulation Authority Act 2003

When making its decision, the ERA must also have regard to the matters set out in section 26(1) of the ERA Act:[1]

a. The need to promote regulatory outcomes that are in the public interest.

b. The long-term interests of consumers in relation to the price, quality and reliability of goods and services provided in relevant markets.

c. The need to encourage investment in relevant markets.

[1] The ERA has discretion to decide the weight it gives to each of the matters listed in section 26 of the ERA Act in making its decision.

d. The legitimate business interests of investors and service providers in relevant markets.

e. The need to promote competitive and fair market conduct.

f. The need to prevent abuse or monopoly or market power.

g. The need to promote transparent decision-making processes that involve public consultation.