
Electricity Safety - Bushfire Mitigation Plan

Classification: Confidential Restricted Unclassified Internal

REVISIONS

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1	Name provided	28 Jun 2023	Initial version issued to ESV
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1 Purpose

The Hazelwood BESS Project Co Pty Ltd operates the Hazelwood Battery Energy Storage System (HBESS) under an Electricity Generation and Sale Licence issued to Hazelwood BESS Project Co Pty Ltd by the Essential Services Commission (ESC) of Victoria on 10 August 2022. A copy of the licence is included at Appendix D.

HBESS is fully enclosed by the Hazelwood Rehabilitation Project's (HRP) land and is within the boundary of Mining License MIN5004. The HRP land has been classified by the CFA as a hazardous bushfire area.

Hazelwood BESS Project Co Pty Ltd as a business that has electrical transmission lines above its premises at HBESS, which includes a hazardous bushfire area, meets the definition of a "Specified Operator". As such, Hazelwood BESS Project Co Pty Ltd for the HBESS must have systems in place to manage its obligations as a Specified Operator.

This Electricity Safety – Bushfire Mitigation Plan (the Plan), amongst other systems of work, helps HBESS meet its specified obligations and ensures ongoing risk management and compliance with the requirements of relevant Victorian legislation related to the operations and maintenance of overhead electrical assets.

Namely, the relevant Regulations are the:

- Electricity Safety Act 1998 (Vic)
- Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic)
- Electricity Safety (Electric Line Clearance) Regulations 2020 (Vic)

2 Scope:

This plan details the practices and procedures in place at HBESS for the prevention of fire caused by overhead electrical assets and the mitigation of any fire incident that may occur.

In recognition of the HBESS site location, and the fact that the "at risk" electrical line sits on land subject to Mining Licence 5004, HBESS leverages policies and procedures of Hazelwood Power (including the Hazelwood Power Electricity Safety – Bushfire Mitigation Plan and Hazelwood Power Health & Safety Mine Fire Service Policy [Paradigm OrigID 2589]) to assist in the development of the Plan.

3 Responsibilities & Authorities

3.1 HBESS Co-ordinator:

The HBESS Co-ordinator shall ensure that all operational personnel and contractors including the Facility Manager understand their responsibilities and comply with the Plan.

The HBESS Co-ordinator shall ensure that:

- the processes and procedures required to comply with the applicable Regulations are in place and followed;
- the Plan is reviewed and updated annually to comply with the Regulations and ensure that any changes to relevant operational procedures are compliant with the Regulations and reflected in the Plan;
- any vegetation pruning or removal is conducted in consultation with the HRP environmental management team;

- an audit process is in place to ensure that the requirements of the Plan and associated regulatory requirements are being met;
- a copy of the current Plan is submitted to Energy Safe Victoria (ESV) annually before 1 July each year;
- each revised Plan gains ESV Acceptance; and
- the accepted Plan is made available on the HBESS website and head office.

3.2 Facility Manager

The contractor Facility Manager shall ensure that all contractor operational personnel and sub-contractors understand their responsibilities and comply with the Plan.

4 Prescribed Particulars

4.1 The name address, email address and telephone number of the specified operator- reg 6, para (a) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

Name: HAZELWOOD BESS PROJECT CO PTY LTD ACN 643 891 703 as trustee for the HBESS ASSET TRUST ABN 34 755 328 434
 Email: enquiries.au@engie.com
 Address: Level 23, 2 Southbank Boulevard, Southbank VIC 3006
 Phone No: (03) 9617 8400
 Business Hours: 9am – 5pm Monday - Friday

4.2 The name address, email address and telephone number of the Electricity Generation and Sale Licence holder - section 18 of the Electricity Industry Act 2000 (Vic):

Name: HAZELWOOD BESS PROJECT CO PTY LTD ACN 643 891 703 as trustee for the HBESS ASSET TRUST ABN 34 755 328 434
 Email: enquiries.au@engie.com
 Address: Level 23, 2 Southbank Boulevard, Southbank VIC 3006
 Phone No: (03) 9617 8400

4.3 Person responsible for the preparation of the Plan- reg 6, para (b) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

Name: HBESS Project Onsite Representative
 Email: enquiries.au@engie.com
 Address: 1 Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
 Phone No: (03) 9617 8400

4.4 Person responsible for carrying out the Plan- reg 6, para (c) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

Name: HBESS Co-ordinator
Email: enquiries.au@engie.com
Address: 1 Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: 03) 9617 8400

4.5 Specified Operator's control room- reg 6, para (d) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

Email: enquiries.au@engie.com
Phone No: (03) 9617 8400

4.6 Facility Manager:

Name: Facility Manager
Email: enquiries.au@engie.com
Address: 525 Collins St, Suite 212 Spaces Rialto Melbourne VIC 3000 Australia
Phone No: (03) 9617 8400

4.7 Emergency Commander (24/7):

Name: Emergency Commander (Security and Emergency Service Contractor)
Address: 1 Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 3333

4.8 Stakeholder Engagement contact:

Name: HBESS Stakeholder Engagement Manager
Address: Level 23, 2 Southbank Boulevard, Southbank VIC 3006
Phone No: (03) 9617 8400

4.9 Fire Policies - reg 6, para (e) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

HBESS manages and maintains its overhead line infrastructure to ensure that the probability of overhead electrical lines causing a fire is minimised, in the known high-risk environment of the HRP.

The HBESS Fire Management policy is currently being finalised by the Specified Operator and will be implemented as soon as possible.

The existing Hazelwood Power Health & Safety Mine Fire Service Policy [Paradigm OrigID 2589], provides a framework of standards and guidelines which are aimed at:

- Outlining management's commitment to minimising the risks associated with fire at the HRP which encloses the HBESS site;
- Protecting the safety of employees, contractors and third parties attending the site;

- Protecting HRP assets, infrastructure and exposed coal reserves;
- Minimising fire-related disruptions to the decommissioning, demolition and rehabilitation operations;
- Providing a means of promptly reporting, containing and extinguishing fires at the HRP site;
- Preventing the development of a major coal fire giving rise to impacts on third parties and the environment; and
- Ensuring that all HRP infrastructure for fire prevention, mitigation, and suppression meets industry best practice, and operational requirements.

These requirements are delivered through the HRP Fire Risk Management Plan [Paradigm OrigID 56965] (FRMP).

4.10 Relationship between HBESS and HRP FRMP:

HRP is required to ensure that its FRMP maintains processes and procedures that control the risks of its operations so as to not cause a fire, in a known high-risk environment. Given the location of HBESS, HBESS is included in the risk assessment of the HRP FRMP.

4.11 Objectives of the plan to achieve the mitigation of fire danger arising from the specified operator's at-risk electric lines - reg 6, para (f) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

To ensure that effective risk minimisation is achieved, the HBESS “at-risk” electric line is regularly inspected and vegetation is removed where identified.

4.12 A description, map, or plan of the land to which the bushfire mitigation plan applies, identifying the location of the specified operator’s at-risk electric lines. - reg 6, para (g) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

A plan showing HBESS located to the south of the Latrobe City township of Morwell and a site locality map is shown at Appendix A. The HBESS site and at risk electric lines are wholly within an area assigned by the Country Fire Authority (CFA) as a “High” Fire Hazard Rating.

A drawing of the HBESS site and the “at-risk” electrical line assets is shown at Appendix B.

The “at risk” electrical line is the entirety of the HWPS-HWBS transmission line connecting the HBESS to the AusNet Hazelwood Switchyard.

4.13 ESV exemptions:

HBESS does not have any existing authorised ESV exemptions to Regulations and/or Sub Regulations with reference to the relevant electrical infrastructure (at risk electric lines) located on the HRP site.

4.14 Preventative strategies - reg 6, para (h) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

HBESS undertakes line clearance assessments and vegetation removal and/or pruning in accordance with the HBESS Electric Line Clearance Plan [HBESS-OP-D-0002].

Prior to construction of the at risk line approximately 12 months ago all infringing vegetation was removed and no outstanding clearing requirements remain.



All electrical overhead lines are routinely visually inspected in accordance with the HBESS HV Maintenance Plan [14343-OAM-FLN-90-001] – see the maintenance summary in Appendix C Maintenance summary for further details. Vegetation line clearance inspections are ground based visual inspections, with the full length of the line and area beneath, visible from the ground at pole 2.

All faults are recorded, and managed, through the HBESS CMMS. Line clearance defects are to be immediately actioned and specialist qualified resources engaged to undertake pruning or clearing. All pruning and clearing is conducted in consultation with the HRP environmental management team and in accordance with the HBESS Electric Line Clearance Plan [HBESS-OP-D-0002].

Other line defects identified during the inspection process are prioritised based upon the fault. Three priorities for rectification are assessed, high – immediate to 30 days, medium – 30 days to 6 months, low – 6 months to 3 years.

The recording of defects in the HBESS CMMS allows HBESS personnel to independently review all reported faults as an audit of the inspection work and timely rectification of defects.

4.15 Plan for inspection of electrical assets - reg 6, para (i) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

The HBESS specified operator has an O&M Agreement in place with the Facility Manager to provide an inspection of all overhead high voltage power lines (“at risk” electric lines) on a three-yearly cycle, with a general inspection and vegetation assessment every six months.

Appendix C - Maintenance summary details the inspections and assessments undertaken during each cycle.

4.16 Details of the processes and procedures for ensuring that each person who is assigned to carry out the inspections referred to in paragraph (i)- reg 6, para (j) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

All persons shall only perform work for which they are qualified, competent and trained.

The Facility Manager ensures anyone employed or engaged in respect of any activities connected with the HBESS operations and maintenance including line inspections possesses the appropriate skill, expertise, approvals and qualifications. The assessment is undertaken in accordance with the HBESS Project Health and Safety Management Plan [14343-HAS-GEN-90-001].

The Facility Manager engages the resources, arranges their access to the site, checks competencies prior to commencement, and monitors progress.

All persons carrying out line inspections are employees or contractors of the Facility Manager and complete full inductions to site prior to entry. The induction process details the minimum requirements for carrying out work on site including the requirement to report all incidents to the Specified Operator.

Three yearly inspections are completed by persons with a Certificate II Accreditation in Asset Inspection (or equivalent as approved by ESV).

Inspector qualifications are checked by the Specified Operator, as part of the ENGIE Group Health & Safety Rule Health & Safety with regard to Contractors and Subcontractors [GHSD-GOV-GR-02], when notified by the Facility Manager of the inspection.

4.17 Details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (j)) who carry out or will carry out functions



under the plan are competent to do so - reg 6, para (k) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

Other personnel carrying out inspections, as part of normal operational activities on the transmission system, are trained by Registered Training Organisations to Units of Competency in the Australian Qualifications Framework as Electrical Operators and authorised by the Specified Operator to operate the HBESS high voltage transmission line.

The Facility Manager ensures anyone employed or engaged in respect of any activities connected with the HBESS operations and maintenance including line inspections possesses the appropriate skill, expertise, approvals and qualifications. The assessment is undertaken in accordance with the HBESS Project Health and Safety Management Plan [14343-HAS-GEN-90-001].

All persons on site who are carrying out functions under the plan complete full inductions to site prior to entry. The induction process details the minimum requirements for carrying out work on site including the requirement to report all incidents to the Specified Operator.

The HBESS Co-ordinator undertakes auditing to verify site inductions, competencies, and site activities are compliant with the Plan.

4.18 Operation and Maintenance Plans for at-risk electrical lines - reg 6, para (l) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

These plans include safeguards that enable the HBESS transmission line to continue to operate 24/7.

4.18.1 In the event of a fire:

In the event of a fire:

- The HBESS transmission line (“at risk electrical equipment”) is designed to operate without substantial impairment, so as to ensure power supply is maintained.
- Any non-essential planned critical asset maintenance activity will be cancelled in order to ensure that all available HBESS personnel can be called upon to assist with the fire response.
- In the event of a major fire within the business, the Project Emergency Response Plan [14343-HAS-GEN-90-003] shall be implemented and actions necessary to protect the HBESS’s power systems will be directed by the HRP Emergency Commander or the CFA/FRV Incident Controller with technical support from HBESS personnel.

4.18.2 During a day of Total Fire Ban:

During a day of Total Fire Ban all transmission line non-essential planned maintenance activity shall be cancelled and any essential maintenance which is proposed to proceed, will be risk assessed to ensure that it does not constitute a fire risk.

4.18.3 During a fire danger period:

During a fire danger period all inspections and high priority maintenance work shall have been completed prior to the start of the fire danger period to minimise fire risk due to the transmission equipment. Any required vegetation removal will have been completed.

Due to the inherent Hazelwood Power Mine fire risk and the HBESS residing within the Mine licence, HBESS shall respect a declaration of a Fire Season for the Mine by Hazelwood Power, which is independent of the CFA declared season (which typically takes effect some time prior to the CFA fire season). The declaration of a Mine Fire Season under the Hazelwood Power Fire Readiness Planning Guidelines [Paradigm OrigID 36546] initiates a series of preparatory measures within the

Mine to ensure all protective equipment and systems are serviceable and that necessary training and inspections have been conducted to implement a high level of preparedness.

4.19 Investigations, analysis and methodology to be adopted for the mitigation of the risk of fire ignition from at-risk electrical lines- reg 6, para (m) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

HBESS site and Mine fire incidents are reported and investigated in accordance with the HBESS Project Health and Safety Management Plan [14343-HAS-GEN-90-001], and HBESS Incident Notification Guideline [14343-HAS-GEN-90-009] using the HBESS incident management portal (Salesforce).

Mine fire is subject to risk assessment under the current Victorian Occupational Health and Safety Regulations. Under these regulations fire has been determined to be a Major Mining Hazard. In accordance with the requirements of these Regulations, a detailed risk assessment has been undertaken and a series of control measures established to reduce risks to the extent that is reasonably practicable. These risk assessments and control measures are subject to periodic review in accordance with the requirements of the Regulations, and oversight from the relevant Regulator (WorkSafe Victoria).

In addition to meeting its WorkSafe commitments HRP is required to assess risks that may have the potential to impact upon public health and safety, community facility and the environment. HRP assess those risks through its Risk Management Plan (RMP) (formally the Risk Assessment and Management Plan (RAMP)), a requirement of the Mining License under the *Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013*, Schedule 15. The RMP provides a detailed assessment of mine fire and the prevention and mitigation measures implemented and incorporated into its policies and procedures. It is also a condition of the license that the RMP must be approved by the Department Head of the Department of Jobs, Precincts and Regions Earth Resources Regulation (DJPR ERR). HBESS is included in the HRP risk assessment.

All Mine fires are reported to WorkSafe, CFA, Fire Rescue Victoria (FRV) and DJPR ERR on an incident-by-incident basis. Additionally, a summary of all fires on site are sent to FRV, CFA and DJPR ERR, for further review and oversight, on a monthly basis.

No fire activity has been experienced in the HBESS at-risk transmission line area during or since the construction of the HBESS at-risk line.

4.20 Specified Operator's Processes and Procedures - reg 6, para (n) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

Below are details of the processes and procedures by which the specified operator will take certain action.

4.20.1 Monitor the implementation of the Plan:

Biannually, the HBESS Co-ordinator monitors the completion of the transmission line assessments provided in Appendix C - Maintenance summary

4.20.2 Audit the implementation of the Plan:

In addition to the audits conducted by the HBESS Co-ordinator in section 4.17 above, all elements of regulatory compliance are audited/inspected by ENGIE internal personnel/auditors. In addition to internal audits, the HRP site (which includes HBESS) is audited/inspected by Independent Auditors and various Regulators, including DJPR ERR and WorkSafe. The Regulators have adopted a process of audits and HRP site inspections specifically related to fire, both prior to and during the declared fire season.



4.20.3 Identify any deficiencies in the Plan or the Plan's effectiveness:

The HRP fire policies and procedures (including HBESS assets) are reviewed annually prior to the commencement of the Annual Fire Season declared for the HRP Mine as per the Mine Pre-Fire Season Checklist [Paradigm OrigID 36549].

In addition, business processes ensure the update of policies and procedures based on input from any incident investigations, internal audits, external audits, Regulator reviews, etc., by logging and monitoring of action items using the HBESS incident management portal (Salesforce).

The Regulator audits relating to fire preparedness are conducted by WorkSafe and DJPR ERR and can also identify deficiencies in the plans or systems in use on site. Recommendations from the Regulators are enforceable and must be complied with.

4.20.4 Change the Plan and the Plan's implementation to rectify any deficiencies identified:

As noted in 4.20.3 above, ENGIE has a process to capture and implement improvements for policies and procedures based on findings, recommendations and / or employee suggestions.

4.20.5 Monitor the effectiveness of inspections carried out under the Plan:

All contractors working on site are subject to routine inspections and audit under the ENGIE Group Health & Safety Rule Health & Safety with regard to Contractors and Subcontractors [GHSD-GOV-GR-02].

In accordance with the group rules, the Operations Manager and/or the HBESS Co-ordinator check and monitor the contractor once on site and confirm that all health and safety requirements are being met, the contractor's personnel are qualified and licensed for the work they are performing, and documented work procedures are being followed to the required standard.

4.20.6 Audit the effectiveness of inspections carried out under the Plan:

Compliance audits, inspections and reviews are undertaken on the HBESS site by HBESS internal nominated auditors/inspectors, independent auditors and various Regulatory Inspectors e.g., WorkSafe, ESV and DJPR ERR. These activities may include inspection of the site, a desk-top review, and an assessment of processes/procedures being utilised and supporting documentation. Defects and/or Opportunities for Improvements (OFIs) identified through these activities are then planned, scheduled and implemented in a timely manner to improve compliance with this Plan.

4.21 The policy in relation to assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electrical lines - reg 6, para (o) Electricity Safety (Bushfire Mitigation) Regulations 2023 (Vic):

The HBESS Fire Management policy is currently being finalised by the Specified Operator and will be implemented as soon as possible. HBESS, in conjunction with HRP, maintains a key stakeholder relationship with the local CFA and FRV due to the high risk of fire to the business.

Regular meetings and joint exercises are held between HBESS, HRP, CFA and FRV.

In line with the Board of Inquiry's October 2014 Report into the Hazelwood Mine Fire Recommendations and Affirmations, a number of additional training, resource sharing and communication initiatives have been implemented between HRP and both the CFA and FRV.

The Project Emergency Response Plan [14343-HAS-GEN-90-003] details the relationship between HBESS, HRP, the CFA/FRV and other state emergency service organisations.



The Project Emergency Response Plan [14343-HAS-GEN-90-003] also details the requirements for statutory investigations as well as regulatory investigations by other emergency services authorities, and the support to be provided by HBESS.

In addition, significant fires are also reported to WorkSafe and DJPR ERR. Should a significant fire be caused by an HBESS site electrical asset, a report would also be provided to ESV.

5 Accessibility of Documents

A copy of the approved ESV version of this Plan is made available for inspection during business hours in accordance with the Electricity Safety Act 1998 (Vic).

An electronic copy of this Plan is made available on the Hazelwood BESS website <https://engie.com.au/hazelwoodbattery>.



6 References

Number	Description	Revision No.	Version Date
Paradigm OrigID 2589	Mine Fire Service Policy	3.5	30/09/2021
Paradigm OrigID 36546	Fire Readiness Planning Guidelines	3.10	31/12/2021
Paradigm OrigID 36549	Mine Pre-Fire Season Checklist	2.8	28/06/2022
HP CM MD 18/335	Hazelwood Mine - Risk Management Plan – RMP 3.2	3.2	05/03/2018
Paradigm OrigID 56965	Fire Risk Management Plan (FRMP)	1.1	04/08/2018
14343-HAS-GEN-90-001	Project Health and Safety Management Plan	12	23/02/2023
14343-HAS-GEN-90-003	Project Emergency Response Plan	08	09/11/2022
14343-HAS-GEN-90-009	HBESS Incident Notification Guideline	01	23/11/2021
14343-OAM-FLN-90-001	HBESS HV Maintenance Plan	02	18/08/2023
GHSD-GOV-GR-02	ENGIE Group Health & Safety Rule Health & Safety with regard to Contractors and Subcontractors	6	15/03/2023
HBESS-OP-D-0002	Electric Line Clearance Plan	1	15/09/2023
n/a	Occupational Health and Safety Regulations 2017 (Victorian)		
n/a	Board of Inquiry Report into the Hazelwood Mine Fire (October 2014)		

Appendix A - Hazelwood BESS Locality Map

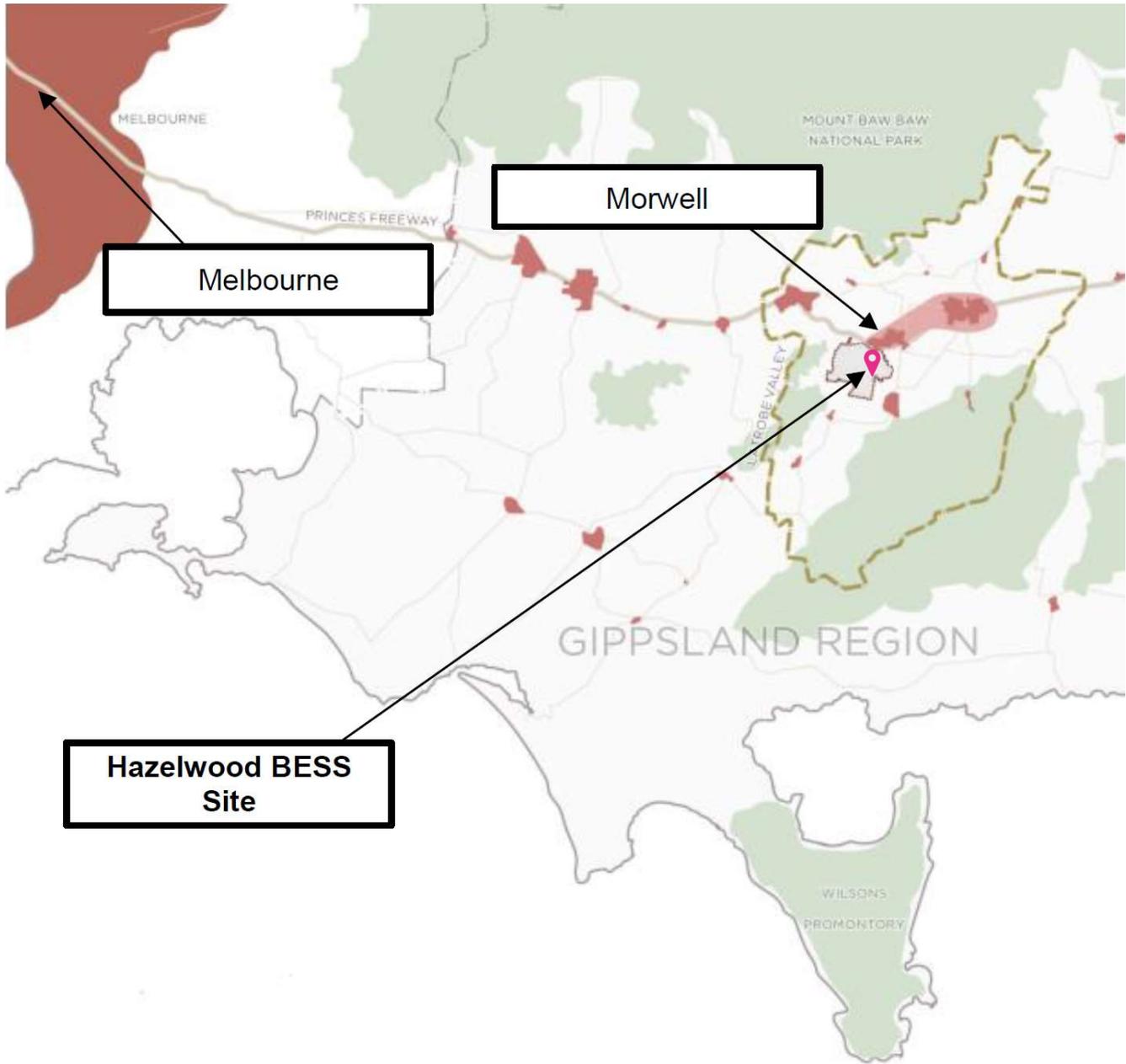


Figure 1: HBESS Locality

Appendix B - HBESS High risk transmission line assets

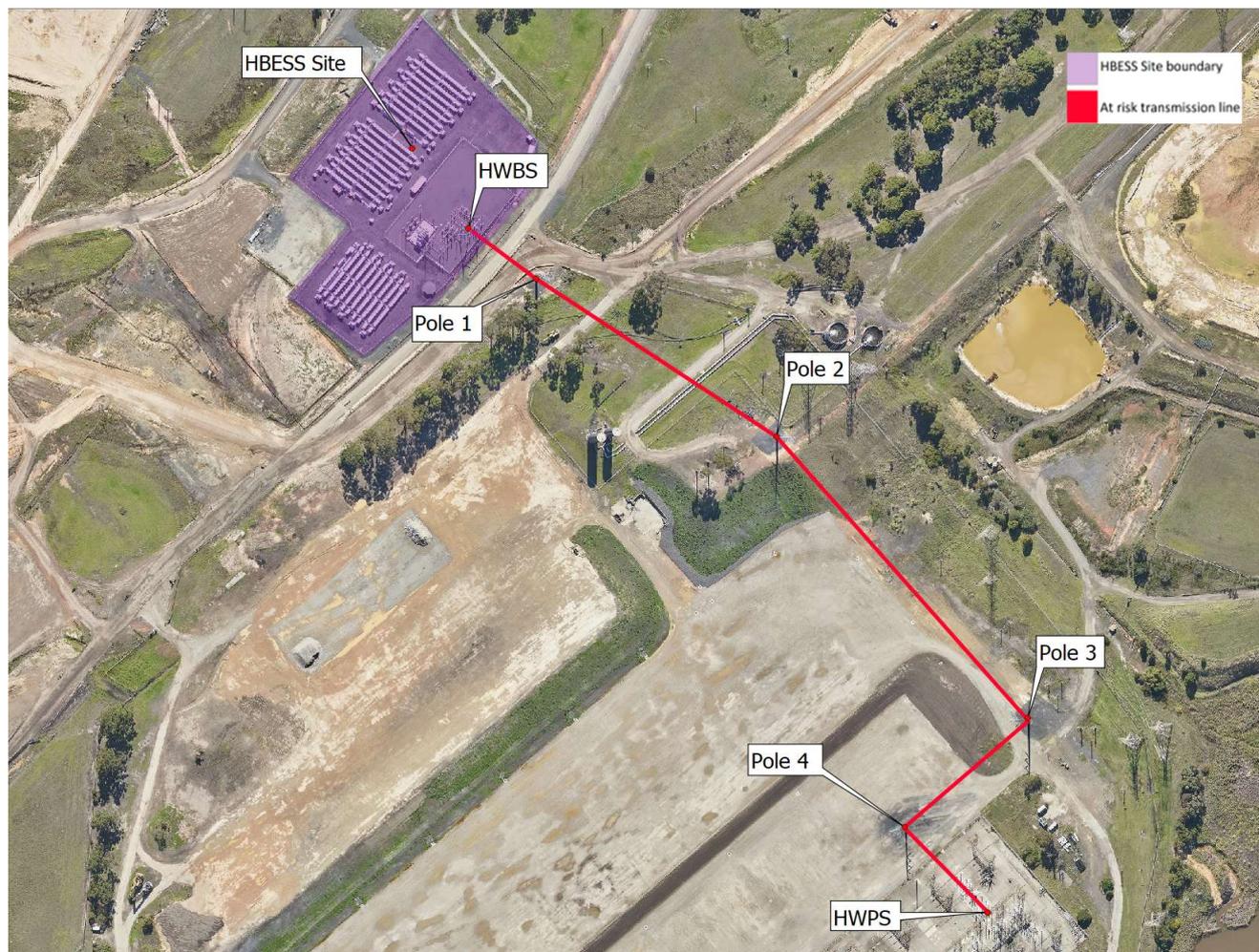


Figure 2: HBESS High risk transmission assets shown in red

Table 1 - Register of HBESS “at risk lines” by Line Nomenclature

Line Nomenclature	Line Voltage	Concrete Poles	Wood Poles	Steel Monopole (31+ metre)	Line Length in Metres	Year of original construction
HWPS-HWBS	220kV	0	0	4	714	2022

Table 2 - Register of HBESS “at risk lines” by Structure

Structure from	Structure To	Phases	Span Length (m)	Conductor
HWBS	Pole 1	3	57.60	TWIN "LEMON" 30/7/3.0 ACSR/GZ.
Pole 1	Pole 2	3	198.24	TWIN "LEMON" 30/7/3.0 ACSR/GZ.
Pole 2	Pole 3	3	262.52	TWIN "LEMON" 30/7/3.0 ACSR/GZ.
Pole 3	Pole 4	3	112.78	TWIN "LEMON" 30/7/3.0 ACSR/GZ.
Pole 4	HWPS	3	82.64	TWIN "LEMON" 30/7/3.0 ACSR/GZ.

Appendix C - Maintenance summary

18. Transmission line Maintenance Checklist

Inspection item	Assessment (6 Months)		
	GOOD	POOR	OBS.
General Visual inspection of the whole structure			
Vegetation assessment (control if needed)			

Inspection item	Assessment (3 Yearly)		
	GOOD	POOR	OBS.
SUPPORT POSTS AND REINFORCEMENTS			
Support accesses. Paths and accesses to support posts in good condition.			
Verticality of support post. No collapse, inclination or warping and no twisting.			
Condition of metal elements. No rust or buckling on support post and brace.			
Nuts and bolts, and bars. No material missing on support post and on brace.			
Punching of nuts and bolts. All nuts and bolts have been punched.			
Condition of foundations. No cracks or fissures, and no play with support post.			
Foundation covering. Still covered and correctly surfaced.			
Other situations of risk. No water pooling at foot of support post.			
Electrical hazard warning plate. There are at least two and these are legible.			
Support Post Identification Plate. Support post is numbered, and this is legible.			
Anti-climbing devices , in good condition.			
Torque of Nuts and bolts and bars on column and brace. Uprights and latticework are correctly fastened, listening to the noises detected as a result of the vibrations.			
Leveling of brace. Level and no incline.			
Vegetation assessment: Check for any trees or other possible hazard due to nearby vegetation			
Access roads. Vegetation-free, track (where applicable) in good condition.			
INSULATOR CHAINS	GOOD	POOR	OBS.
Cleaning insulators. There is no contamination on the surface.			

Inspection item	Assessment (3 Yearly)		
General condition of insulators. Breakage. No cracks or fissures on the glass or ceramics.			
Rods on ceramic insulators. No loss of material observed.			
Rods on compound insulators. No conductor paths visible.			
No of insulators. No insulators missing on any of the chains.			
CONNECTIONS	GOOD	POOR	OBS.
Connections. No cracks, rust or signs of overheating.			
No of conductor and ground cable connections. Not more than one connection per span length and conductor.			
Condition of F.O. connection box In good condition.			
CONDUCTORS	GOOD	POOR	OBS.
Condition of conductor and ground cable. No broken strands, rust or dirt.			
Foreign objects on cables. Absence of objects.			
Cable tension. There is parallelism between conductors.			
FITTINGS AND OTHER ELEMENTS MOUNTED ON CONDUCTOR	GOOD	POOR	OBS.
Fittings on conductors. Correctly mounted, no breaks, no loss of material.			
Fittings on ground cable. Correctly mounted, no breaks, no loss of material.			
Counterweights. Correctly mounted, no breaks, no loss of material.			
Anti vibrators. Correctly mounted, no breaks, no loss of material.			
Separators. Correctly mounted, no breaks, no loss of material.			
OPGW FIBER CABLES	GOOD	POOR	OBS.
Condition of F.O. connection box in good overall condition			
Condition of protective pipe on descent. Correctly secured and without rust.			
General condition of cable. Correctly installed and without breaks			
Beacons. Anchorage in good condition			
Bird flight diverters. No signs of aging material			
Condition of connection box. Correctly installed, unbroken and without rust			

Inspection item			Assessment (3 Yearly)
GROUPS	GOOD	POOR	OBS.
Existence and condition of grounds on support posts. Cable not frayed or broken			
Disconnection of grounds. Impossible to disconnect grounds from support posts			
Measure of support post ground resistance. (*)			



Appendix D - Electricity Generation And Sale Licence

<p style="text-align: center;">OFFICIAL</p> <div style="text-align: center;">  <p>ELECTRICITY GENERATION AND SALE LICENCE</p> <p>Hazlewood BESS Project Co Pty Ltd (ACN 643 891 703)</p> <p>Issued on 10 August 2022</p> </div>		<p style="text-align: center;">OFFICIAL</p> <p style="text-align: center;">ELECTRICITY GENERATION LICENCE</p> <p>The Licence is issued pursuant to section 18 of the Electricity Industry Act 2000 (Vic) and is subject to the terms set out in this Licence.</p> <p>Date: This Licence was first issued on 10 August 2022.</p> <p>Licencee This Licence is issued to: Hazlewood BESS Project Co Pty Ltd (ACN 643 891 703)</p> <div style="text-align: center;">  <p>THE COMMON SEAL OF THE ESSENTIAL SERVICES COMMISSION was affixed pursuant to the authority of the Commission on 11 August 2022.</p> <p>Kate Symons CHAIRPERSON</p> </div>	<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p style="text-align: center;">CONTENTS</p> <table border="0"> <tr><td>1. Definitions</td><td>1</td></tr> <tr><td>2. Notices</td><td>2</td></tr> <tr><td>3. Grant of the Licence</td><td>4</td></tr> <tr><td>4. Status of the requirements in this Part</td><td>4</td></tr> <tr><td>5. Payment of fees</td><td>4</td></tr> <tr><td>6. Ongoing technical capacity</td><td>4</td></tr> <tr><td>7. Compliance with regulatory instruments</td><td>5</td></tr> <tr><td>8. Compliance with Laws</td><td>5</td></tr> <tr><td>9. Separate accounts</td><td>5</td></tr> <tr><td>10. Provision of information</td><td>5</td></tr> <tr><td>11. Record-keeping</td><td>5</td></tr> <tr><td>12. Variation</td><td>7</td></tr> <tr><td>13. Transfer</td><td>7</td></tr> <tr><td>14. Review</td><td>7</td></tr> <tr><td>15. Administrator</td><td>8</td></tr> <tr><td>Schedule 1 - Variations to the Licence</td><td>8</td></tr> </table>	1. Definitions	1	2. Notices	2	3. Grant of the Licence	4	4. Status of the requirements in this Part	4	5. Payment of fees	4	6. Ongoing technical capacity	4	7. Compliance with regulatory instruments	5	8. Compliance with Laws	5	9. Separate accounts	5	10. Provision of information	5	11. Record-keeping	5	12. Variation	7	13. Transfer	7	14. Review	7	15. Administrator	8	Schedule 1 - Variations to the Licence	8
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<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p>Part A - Definitions and Interpretation</p> <p>1. Definitions</p> <p>1.1. Unless the contrary intention appears a term in bold type has the meaning shown opposite it:</p> <p>Act the Electricity Industry Act 2000 (Vic)</p> <p>Administrator an administrator appointed by the Commission under section 34 of the Act</p> <p>AEMO Australian Energy Market Operator Limited (ACN 072 516 323)</p> <p>Business Day a day other than a Saturday, Sunday or a public holiday in Victoria</p> <p>Change of Control (a) an Entity that Controls the Licencee ceases to Control the Licencee or (b) an Entity that does not Control the Licencee starts to Control the Licencee provided that no change of control will be deemed to have occurred where the Licensee Holding Company first Controls the Licencee until from the acquisition of administration of dealing in securities which are traded on a recognised financial market</p> <p>Commencement Date 10 August 2022</p> <p>Commission the Essential Services Commission established under the ESC Act</p> <p>Control has the same meaning given in section 504A of the Corporations Act</p> <p>Corporations Act means the Corporations Act 2001 (Cth)</p> <p>ESC Act the Essential Services Commission Act 2001 (Vic)</p> <p>Entity has the same meaning given in section 504A of the Corporations Act</p> <p>Licensee Holding Company a subsidiary of the Commission in relation to an entity, or an entity which is first party to a Subsidiary</p> <p>Licensed Generation Facility Hazlewood Battery Energy Storage System located at the vicinity of Brindley Road, Hazlewood, Victoria, 3640</p> <p>Licencee Hazlewood BESS Project Co Pty Ltd (ACN 643 891 703)</p>		<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p>Minister the person who is, from time to time, the Minister for the purposes of the Act</p> <p>National Electricity Law the National Electricity (Victoria) Law as for as in Victoria under the National Electricity (Victoria) Act 2000 (Vic)</p> <p>National Electricity Rules the rules of that name as in force from time to time under the National Electricity Law</p> <p>Objectives the objectives specified in section 10 of the Act and section 1 of the ESC Act</p> <p>Order an Order in Council made or in force under the Act</p> <p>Review a systemic and independent process for obtaining evidence and evaluating it objectively to determine the extent to which particular criteria are fulfilled. This includes, but is not limited to a regulatory audit undertaken in accordance with relevant Guidelines issued by the Commission</p> <p>Subsidiary has the meaning given in the Corporations Act</p> <p>Ultimate Holding Company (a) is a Holding Company of the first-mentioned entity; or (b) is itself a Subsidiary of no entity whose name is entered for electronic trading in electricity operated by AEMO under the National Electricity Rules</p> <p>Wholesale Electricity Market has the meaning given in the Corporations Act</p> <p>1.2. In this Licence, unless the context otherwise requires: (a) headings and footnotes are each for convenience only and do not affect the interpretation of the Licence; (b) words importing the singular include the plural and vice versa; (c) words importing a gender include any gender; (d) an expression importing a natural person includes any company, partnership, trust, joint venture, association, corporation or other body corporate and any governmental agency; (e) a reference to a condition, clause, or part is to a condition, clause, or part of the Licence; (f) a reference to any statute including the Act and regulation, proclamation, Order in Council, ordinance or by-law includes all existing, amending, consolidating, re-enacting, extending or replacing laws, and a reference to a statute, ordinance, or regulation, proclamation, Order in Council, ordinance, by-law and determination issued under that statute.</p>	<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p>(a) a reference to a document or a provision of a document includes an amendment or supplement to, or replacement or inclusion of, that document or that provision of that document; and</p> <p>(b) a reference to a person includes that person's executor, administrator, successors, assigns (including, without limitation, persons acting by novation) and permitted assigns;</p> <p>(i) other parts of speech and grammatical forms of a word or phrase referred to in this Licence have a corresponding meaning;</p> <p>(j) a period of time: (i) which starts from a given day or the day of an act or event is to be calculated exclusive of that day; or (ii) which commences on a given day or the day of an act or event is to be calculated inclusive of that day; and</p> <p>(k) an event which is required under the Licence to occur on or by a stipulated day which is not a Business Day may occur on or by the next Business Day.</p> <p>2. Notices</p> <p>2.1. A notice under this Licence is only effective if it is in writing and sent by: (a) if given by the Licencee to the Commission – addressed to the Chief Executive Officer of the Commission at the physical or email address specified below or at an alternate notice by the Commission: Essential Services Commission, Level 8, 570 Bourke Street Melbourne VIC 3000; or (b) if given by the Commission to the Licencee – given by the Chief Executive Officer of the Commission and addressed to (and mailed for the attention of) the Chief Executive Officer of the Licencee at the physical or email address specified below or as otherwise notified by the Licencee: Hazlewood BESS Project Co Pty Ltd Level 25, 2 Southbank Boulevard, Southbank VIC 3006; or (c) by email to: licences@es.com.au</p> <p>2.2. A notice is to be: (a) signed by or on behalf of the person giving the notice and delivered by hand; or (b) signed by or on behalf of the person giving the notice and sent by post.</p>																																
<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p>2.3. (a) transmitted electronically by or on behalf of the person giving the notice to electronic mail; (b) if delivered by hand – upon delivery to the relevant address; (c) if sent by post – upon delivery to the relevant address; (d) if transmitted electronically – in accordance with the method set out in the Electronic Transactions (Victoria) Act 2000 (Vic) for determining the time of receipt</p> <p>2.4. A notice received after 5:00 pm, or on a day that is not a Business Day, is deemed to be effected on the next Business Day.</p> <p>Part B - Licence</p> <p>3. Grant of the Licence</p> <p>3.1. In exercise of its powers under section 18 of the Act, the Commission grants the Licencee a licence to generate electricity for supply or sale on the terms and conditions set out in this Licence, with effect from the Commencement Date or as varied subsequent to the Commencement Date.</p> <p>3.2. The authorisation granted by this Licence is limited to the generation of electricity on the Licensed Generation Facility, and the sale of the electricity generated at the Licensed Generation Facility through the Wholesale Electricity Market.</p> <p>Part C - Conditions of the Licence</p> <p>4. Status of the requirements in this Part</p> <p>4.1. A failure on the part of the Licencee to meet any of the requirements set out in this Part C: (a) is a breach of a condition for the purposes of Part 7 of the ESC Act; and (b) is a breach of a condition for the purposes of clause 11 of this Licence.</p> <p>4.2. The Licencee acknowledges that any condition deemed by the Act to be included in a licence to generate electricity for supply or sale, forms part of this Licence and that a breach of any such condition constitutes a breach of a condition for the purposes of clause 11 of this Licence.</p> <p>5. Payment of fees</p> <p>5.1. The Licencee must pay a licence fee as determined by the Minister in accordance with the provisions of section 32 of the Act.</p> <p>6. Ongoing technical capacity</p> <p>6.1. The Licencee must at all times maintain: (a) such technical capacity as to:</p>		<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p>(1) required to meet the obligations under this Licence; and (2) reasonably required to undertake the activities authorised by this Licence; and</p> <p>(b) such additional technical capacity as is reasonably required to enable it to meet and deliver technological advances in the electricity industry.</p> <p>6.2. In this clause 6, activities undertaken pursuant to the Licence include any activities undertaken by a contractor, sub-contractor, agent or other third party (a third party engaged by the Licencee for the purpose of enabling the Licencee to undertake the activities authorised by this Licence.</p> <p>6.3. The Licencee must ensure that any contract, entered into with any third parties for the performance of foreseeable functions, contains such provisions as may be necessary to ensure the third party provides services in a way that enables the Licencee to comply with the requirements of this Licence and this clause 6.</p> <p>7. Compliance with regulatory instruments</p> <p>7.1. Subject to clause 7.2, the Licencee must comply with any procedure or Guidelines issued by the Commission from time to time that is prescribed as being one which the Licencee must comply, to the extent they are applicable to activities undertaken by the Licencee pursuant to this Licence.</p> <p>7.2. The Commission may, from time to time, by written notice grant an exemption in relation to or otherwise modify the application of one of the requirements of the instruments referred to in clause 7.1.</p> <p>7.3. The Licencee must have in place an adequate system for monitoring compliance with this Licence and the instruments referred to in clause 7.1.</p> <p>7.4. The Licencee must be registered as a generator with AEMO in accordance with the requirements to be registered as a generator in accordance with the National Electricity Rules.</p> <p>8. Compliance with Laws</p> <p>8.1. The Licencee must comply with all applicable laws.</p> <p>9. Separate accounts</p> <p>9.1. If the Licencee holds more than one category of licence under Part 2 of the Act, the Licencee must prepare separate accounts for each part of its business in respect of which it has been granted a separate licence.</p> <p>10. Provision of information</p> <p>10.1. The Licencee must maintain comprehensive records regarding any activities undertaken pursuant to this Licence for a period of at least 7 years.</p>	<p style="text-align: right;">ELECTRICITY GENERATION AND SALE LICENCE – HAZLEWOOD BESS PROJECT CO PTY LTD</p> <p>10.2. The Licencee must notify the Commission of any breach by it of the conditions of the Licence including any of the instruments referred to in clause 7.1 as soon as reasonably practicable after becoming aware of the breach.</p> <p>10.3. The Licencee must, as soon as reasonably practicable provide AEMO with such information, relating to activities undertaken pursuant to this Licence, as AEMO may properly request in connection with the performance of its functions or the exercise of its powers under the Act in the manner and form specified by AEMO.</p> <p>10.4. The Licencee must, as soon as reasonably practicable, provide the Commission with such information, relating to activities undertaken pursuant to this Licence, as the Commission may properly request in connection with the performance of its functions or the exercise of its powers under the Act in the manner and form specified by the Commission.</p> <p>10.5. The Licencee must, as soon as reasonably practicable, provide the Commission with information on its ongoing technical capacity or financial ability to undertake the activities authorised by this Licence as the Commission may properly request in connection with the performance of its functions or the exercise of its powers under the Act in a manner and form specified by the Commission.</p> <p>10.6. In this clause 10: (a) activities undertaken pursuant to this Licence includes any activities of that type undertaken by a contractor, sub-contractor, agent or other third party (a third party engaged by the Licencee for the purpose of enabling the Licencee to undertake the activities authorised by this Licence); and (b) information includes information in the possession, custody or control of any third party.</p> <p>10.7. Change of Control (a) The Licencee must give the Commission a notice if any event occurs, any decision by the Licencee is made, or any other circumstances arise that will affect a Change of Control of the Licencee; (b) the notice required under condition 10.7(a) must set out particulars of the relevant event, decision or circumstance as soon as practicable and in any case not later than 3 Business Days after the Licencee becomes aware of the event or circumstance or makes the decision.</p> <p>11. Record-keeping</p> <p>11.1. The Commission may revoke the Licence: (a) at any time at the request of, or with the consent of, the Licencee; or (b) in accordance with the Act.</p> <p>11.2. Where the Commission proposes to revoke the Licence, the Commission will issue a notice to the Licencee, specifying:</p>																																

- (a) the basis upon which the Commission proposes to revoke the Licence, and
- (b) the date upon which the revocation is proposed to take effect, such date to be
- (i) where the Commission's opinion it is appropriate that the Licence be revoked in a shorter time frame having regard to its objectives and the merits or circumstances that gave rise to the notice being issued, no less than 5 Business Days after the date upon which the notice is issued; and
- (ii) in all other cases, no less than 20 Business Days after the date upon which the notice is issued.
- (c) that the Licensee has the opportunity to make representations on the matter and the time and date and manner in which those representations must be made.
- 11.3. The Commission must consider any submissions received by the Licensee prior to making a decision to revoke the Licence.
- 11.4. Where the Commission decides to revoke this Licence, the Commission will issue a notice to the Licensee specifying:
- (a) the basis upon which the Commission is revoking the Licence; and
- (b) the date upon which the revocation takes effect, being no earlier than the date specified in the notice issued pursuant to clause 11.2 and this Licence will be revoked on the date specified in the notice.
- 12. Variation**
- 12.1. The Commission may vary this Licence in accordance with section 29 of the Act.
- 13. Transfer**
- 13.1. This Licence may be transferred in accordance with section 31 of the Act.
- 14. Review**
- 14.1. Upon direction by the Commission, the Licensee must appoint an independent reviewer to conduct Reviews of:
- (a) the Licensee's compliance with its obligations under its Licence, a Code of Practice, or the Act; and
- (b) the reliability and quality of information reported by the Licensee to the Commission and the consistency of that information with the Commission's specifications; and
- (c) any other matter relating to the activities conducted pursuant to this Licence, as directed by the Commission.

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- 14.2. Following a direction pursuant to clause 14.1, the Licensee must obtain the Commission's approval of the independent reviewer and the scope, timing and methodology of the Review.
- 14.3. The Licensee must ensure that the Commission is promptly provided with a copy of any reports produced by the independent reviewer pursuant to this clause.
- 14.4. The Licensee must comply, and must require the independent reviewer to comply, with any Guidelines issued by the Commission dealing with Reviews.
- 15. Administrator**
- 15.1. If an administrator is appointed to the Licensee's business under section 24 of the Act, the administrator must exercise its functions and powers in such a manner as may be specified by the Commission in the instrument of appointment.

Schedule 1 – Variations to the Licence

Date	Variation
	This Licence has not been varied.

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