Wooreen Battery Energy Storage System

Bushfire Mitigation Plan 2026

EnergyAustralia

LIGHT THE WAY

Version	Date	Author	Reason
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Amendments in this version: Version 3.0 — Addressed numerous recommendations from ESV.

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1. Glossary of Terms

Term	Definition
At-Risk Electric Line	The term used to reference the entire 220kV overhead electrical transmission line which runs between WBESS and JLTS.
Auto-reclose device	An electrical switching device designed to interrupt power in a fault and then automatically restore power after a predefined time period.
Circuit breaker	An electrical switching device for making and breaking the flow of current in an electrical circuit as a safety measure.
Commissioning	The systematic process of ensuring that all systems and components of a project are designed, installed, tested, and operated according to the owner's requirements before full operation.
Conductor	A metallic component used to carry electrical current within an electrical network.
Differential Protection	A protection scheme that compares current measurements at multiple points to detect internal faults.
Differential relay	A protective device used in electrical systems to detect faults by comparing two or more similar electrical quantities, such as currents or voltages. It operates by identifying discrepancies in these quantities, which may indicate a fault condition.
Easement	A legal right permitting access or use of land for a specified purpose, such as the operation and maintenance of electrical infrastructure.
Electrical Asset	Any equipment used for the generation, transmission, distribution, switching, protection or control of electricity.
Fault	An abnormal condition in an electrical system that disrupts normal current flow, potentially causing equipment damage, safety hazards, or power interruptions.
Fire Danger Period	A period of time declared under the Country Fire Authority Act 1958 to be a Fire Danger Period.
Fire Permit	An approval issued by the relevant authority permitting specified activities that may present a fire ignition risk during fire danger conditions.
Footing	The foundation structure supporting a tower, pole or monopole.
Hazardous Bushfire Risk Area (HBRA)	An area to which a fire control authority has assigned a fire hazard rating of high.
Hot work	Any activity that generates flames, sparks, or significant heat—such as welding, cutting, grinding, brazing, or soldering.
Hot Work Permit	Formal authorisation for activities that generate heat, sparks or flames.
Incident	Any unplanned event that results in or has the potential to result in injury, illness, property damage, environmental harm, or disruptions to operations.
Maintenance	Activities undertaken to maintain an asset in a safe and serviceable condition.
Maximo	The asset management and work management system used to schedule, track, manage and record inspections, maintenance activities, defects and corrective actions.
Monopole	A single-pole support structure used for overhead transmission lines.
Electrical line	A structure to transmit and distribute electricity above ground using suspended conductors supported by poles or towers.
Protection Relay	A device that monitors an electrical system and initiates disconnection when abnormal conditions or faults are detected.
Protection system	The integrated combination of protection relays, current transformers, voltage transformers, communication systems and circuit breakers used to detect and isolate electrical faults.
Root Cause Analysis	A systematic method used to identify the underlying causes of an incident or failure.
Sag and Sway	The vertical and horizontal movement of conductors due to loading and environmental conditions.

Specified Operator	An operator of an At-Risk Electric Line but does not include a major electricity company.
Switchyard	A high-voltage facility that connects, controls, and protects the flow of electricity between power generation, transmission, and distribution systems.
The Plan	The plan to satisfy the Electricity Safety (Bushfire Mitigation) Regulations, this document.
Transmission	The transport of electrical energy over long distances using high-voltage electrical networks.
Total Fire Ban	means a day or partial day that has been declared to be a day or partial day of total fire ban under the Country Fire Authority Act 1958.
Voltage	An electromotive force or potential difference expressed in volts. The electrical potential difference between two points in an electric circuit.
WorkSafe Victoria	The trading name of the Victorian WorkCover Authority, a statutory authority of the state government of Victoria, Australia.

2. Acronyms

Acronym	Definition
ACN	Australian Company Number
ACSR	Aluminium Conductor Steel Reinforced
ABN	Australian Business Number
AIO	Authorised Issuing Officer
BESS	Battery Energy Storage System
BMP	Bushfire Mitigation Plan
CEMP	Construction Environmental Management Plan
CFA	Country Fire Authority
EA	EnergyAustralia
ESC	Essential Services Commission
ESI	Electrical Supply Industry
ESV	Energy Safe Victoria
FRV	Fire Rescue Victoria
GPS	Global Positioning System
GZ	Galvanized Steel Wire
HBRA	High Bushfire Risk Area
HSSE	Health, Safety, Security and Environment
HV	High Voltage
JLTS	Jeeralang Terminal Station
KPI	Key Performance Indicator
kV	Kilovolt (unit of measurement for voltage)
OEM	Original Equipment Manufacturer
OFI	Opportunity For Improvement
OHSMP	Occupational Health and Safety Management Plan
OPGW	Optical Ground Wire
O&M	Operations and Maintenance
Pty Ltd	Proprietary Limited

RIC	Recipient in Charge
RTO	Registered Training Organisation
SCADA	Supervisory Control and Data Acquisition
SME	Subject Matter Expert
UET	Utilities Industry Training Package (prefix for nationally recognised electrical qualifications)
Vic	Victoria
WBESS	Wooreen Battery Energy Storage System (Note, the abbreviation WESS is interchangeable with WBESS and is occasionally used in drawing references)
WOES	Wooreen Energy Storage (line nomenclature)

3. Purpose

The Wooreen Project Pty Ltd operates the Wooreen Battery Energy Storage System (WBESS) under an Electricity Generation and Sale Licence issued to Wooreen Project Pty Ltd by the Essential Services Commission (ESC) of Victoria on 23 February 2026. A copy of the licence is included in Appendix C. EnergyAustralia Portfolio Holdings Pty Ltd (EnergyAustralia)(EA) is a 50% owner of Wooreen Project Pty Ltd. EnergyAustralia will be responsible for the management of WBESS, including the At-Risk Electric Line and corresponding easement.

Wooreen Project Pty Ltd as a business that has electrical transmission lines on its premises at WBESS, which includes a bushfire prone area, meets the definition of a 'Specified Operator'. As such, Wooreen Project Pty Ltd for the WBESS must have systems in place to manage its obligations as a Specified Operator. Wooreen Project Pty Ltd is the Specified Operator for the At-Risk Electric Line covered in this plan. Wooreen Project Pty Ltd retains responsibility for complying with the Bushfire Mitigation Plan and the applicable requirements of the Electricity Safety Act, the Electricity Safety (Bushfire Mitigation) Regulations, and the Electricity Safety (Electric Line Clearance) Regulations.

This Electricity Safety – Bushfire Mitigation Plan (the Plan), amongst other systems of work, helps Wooreen Project Pty Ltd 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 (Vic)
- Electricity Safety (Bushfire Mitigation) Regulations (Vic)
- Electricity Safety (Electric Line Clearance) Regulations (Vic)

4. Scope

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

5. Responsibilities and authorities

5.1. WBESS Asset Manager

The WBESS Asset Manager shall ensure that all operational personnel and contractors understand their responsibilities and comply with the Plan.

The WBESS Asset Manager 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 internally 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 EnergyAustralia's 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 Plan is re-submitted to Energy Safe Victoria (ESV) on a five-yearly cycle;
- each revised Plan gains ESV Acceptance; and
- the accepted Plan is made available on the WBESS website and head office.

The WBESS Asset Manager performs the above duties on behalf of Wooreen Project Pty Ltd.

6. Prescribed particulars

6.1. Details of the Specified Operator (regulation reference 6(a))

Field	Detail
Name	WOOREEN PROJECT PTY LTD ACN 679 541 658 as trustee for WOOREEN PROJECT TRUST ABN 27 210 168 496
Email	wooreenplanner@energyaustralia.com.au
Address	697 Collins Street, Docklands, VIC 3008
Phone	03 8621 5603

6.2. Details of the person responsible for preparation of the Plan (regulation reference 6(b))

Field	Detail
Name	EnergyAustralia Lead Principal Engineer Electrical
Email	wooreenplanner@energyaustralia.com.au
Address	30 Bonds Lane, Hazelwood North, VIC 3840
Phone	03 8621 5603

Note, the email address and phone number provided are shared contact details accessible by the relevant position holder.

6.3. Details of the person responsible for carrying out the Plan (regulation reference 6(c))

Field	Detail
Name	WBESS Asset Manager
Email	wooreenplanner@energyaustralia.com.au
Address	30 Bonds Lane, Hazelwood North, VIC 3840
Phone	03 8621 5603

Note, the email address and phone number provided are shared contact details accessible by the relevant position holder.

6.4. Contact information of the Specified Operator's control room (regulation reference 6(d))

Field	Detail
Email	wooreenemergencymanagement@energyaustralia.com.au
Phone / Emergency contact	Primary: 03 8621 5602 Escalation: 03 8621 5603

The above two phone numbers are monitored 24/7 and can be called in the case of an emergency.

Note, WBESS does not have a control room.

6.5. The bushfire mitigation policy to minimise risk of fire ignition from the At-Risk Electric Line (regulation reference 6(e))

Wooreen Project Pty Ltd manages and maintains its At-Risk Electric Line infrastructure to ensure that the probability of the At-Risk Electric Line causing a fire is minimised.

The At-Risk Electric Line for the purpose of this Bushfire Mitigation Plan is an approximately 600 metre 220 kV overhead line that runs from the WBESS HV switchyard to the existing Jeeralang Terminal Station.

During the operation and maintenance (O&M) phase of the project the site will be controlled by EnergyAustralia, on behalf of Wooreen Project Pty Ltd, and fire risk will be managed using the Wooreen Energy Storage System Project Fire Management Plan (FMP) (WESS-EA-10110-ABD040-0007). This plan provides a framework of standards and guidelines aimed at:

- Outlining management's commitment to minimising the risks associated with fire at WBESS, including from the At-Risk Electric Line.
- Protecting the safety of employees, contractors and third parties attending the site.
- Protecting WBESS assets and infrastructure.
- Minimising fire-related disruptions to the operation of the BESS.
- Providing a means of promptly reporting, containing and extinguishing fires at WBESS.
- Preventing the development of a major bushfire giving rise to impacts on third parties and the environment.
- Ensuring that all WBESS infrastructure for fire prevention, mitigation, and suppression meets industry best practice and operational requirements.

The risk of bushfire caused by the At-Risk Electric Line is minimised via the following means:

- **Prevention of failures –** The design and construction of the At-Risk Electric Line, as well as all protection systems, have been reviewed by internal registered engineers as well as a tier one owners engineering consultancy to ensure its quality.
- **Clearing of faults –** The At-Risk Electric Line is protected by fast acting differential relays and circuit breakers which will quickly disconnect the At-Risk Electric Line in the case of a fault.
- **Avoidance of contact –** The At-Risk Electric Line is a short 600 m long and is located wholly on EnergyAustralia / Wooreen Project Pty Ltd owned land which will only be accessible to authorised personnel.
- **Maintaining clearance –** The At-Risk Electric Line conductors have appropriate vertical and horizontal clearances, inclusive of sag and sway to meet the requirements of the Electricity Safety (Electric Line Clearance) Regulations.
- **Compliance with Acts and Regulations –** This plan and the Wooreen Battery Energy Storage System Electric Line Clearance plan 2026 -2027 have been developed to ensure compliance with Acts and Regulations relating to the minimisation of fire ignition risk from the At-Risk Electric Line.

6.6. Objectives of the Plan to achieve mitigation of fire danger arising from the At-Risk Electric Line (regulation reference 6(f))

The fundamental intent of the Bushfire Mitigation Plan is to ensure that effective risk minimisation is achieved.

The objectives of the plan to achieve this aim are the following:

- Clearances around the At-Risk Electric Line conductors are maintained to the standards defined in the Electricity Safety (Electric Line Clearance) Regulations, though regular inspection of vegetation and appropriate clearance where required.
- Inspections and all other work associated with the At-Risk Electric Line is done by suitably qualified personnel, with qualifications approved by ESV.
- The At-Risk Electric Line is regularly inspected for signs of damage or wear that would indicate an increased chance of failure.
- The length of the At-Risk Electric Line is maintained clear of vegetation and other debris which could act as fuel in the case of a fire.
- To achieve minimal or zero fire starts caused by WBESS electrical assets, in particular the At-Risk Electric Line, as far as practical.
- To maintain the At-Risk Electric Line and associated assets in sound condition.

6.7. Description of land this plan applies to with the At-Risk Electric Line identified (regulation reference 6(g))

The Wooreen At-Risk Electric Line originates at WBESS, located at 30 Bonds Lane Hazelwood North, it then runs approximately 600 m to the nearby Jeeralang Terminal Station (JLTS), also located at 30 Bonds Lane, where it terminates and joins the network. This is shown in Appendix B. Note, this Bushfire Mitigation Plan applies to the 220 kV At-Risk Electric Line as shown in Appendix A.

The land that the At-Risk Electric Line runs through is completely owned by Wooreen Project Pty Ltd/EnergyAustralia and is relatively flat farmland with minimal vegetation aside from grass and almost no trees at all. There is one small section of land in proximity with the At-Risk Electric Line which contains trees, though the clearance between these trees and the At-Risk Electric Line is in excess of the minimal clearance requirements as defined in the Electricity Safety (Electric Line Clearance) Regulations.

A plan showing WBESS located to the south of the Latrobe City township of Morwell and a site locality map is shown at Appendix A.

A drawing of WBESS and the At-Risk Electric Line is shown at Appendix B, as well as the co-ordinates of the At-Risk Electric Line.

WBESS and the At-Risk Electric Line are wholly within an area assigned by the Country Fire Authority (CFA) as a High Bushfire Risk Area (HBRA).

6.8. Preventative strategies and programs to be adopted to minimise risk of the At-Risk Electric Line starting fires (regulation reference 6(h))

The following preventative strategies and programs will be implemented at WBESS to minimise the risk of the At-Risk Electric Line starting fires:

- The entire length of the At-Risk Electric Line is to be inspected, by someone with an ESV approved qualification, no longer than 37 months from the date of the previous inspection, and all defects will be logged into a computerised management system (Maximo) to ensure they are rectified in an appropriate timeframe.
- Smaller vegetation such as grass will be managed by landscaping services on an as needed basis.
- Given the existing 40 meter wide line easement is clear of trees, the WBESS Asset Manager will ensure all vegetation, including trees, will be officially inspected, by an appropriately trained and qualified person, every 24 months. In the case of encroachment into the minimum clearance space of the At-Risk Electric Line, the vegetation will be appropriately assessed and cleared.

Any defects found will be recorded in Maximo and assigned a priority rating of 1 to 3. The priority rating will be defined based on the following:

Priority 1: The defect is assessed as an immediate risk to supply reliability, fire or public safety.

Priority 2: The defect is not assessed as an immediate risk to supply reliability, fire or public safety, but is likely to become one after approximately seven days.

Priority 3: The defect is not assessed as priority 1 or priority 2 but will require attention before the next scheduled inspection.

Repairs will happen in a timeframe based on priority as defined below:

Table 1: Priority response times

Priority Rating	Response Time
1	Within 24 hours
2	Within 7 days
3	Within 60 days

Once a defect has been identified and assigned a priority rating it will be entered into Maximo with a rectification method. The work will be assigned to suitably trained personnel, tracked, completed and closed out. The WBESS Asset Manager will be responsible for all defect rectification work done at WBESS and will verify the completion of the activity and formally close the task.

The response times listed in the table above indicate the maximum allowable period for defect rectification. Where complete rectification is not achievable within the specified timeframe, appropriate interim controls shall be implemented to eliminate or mitigate the risk presented by the defect.

6.9. Plan for inspection of electrical assets (regulation reference 6(i))

All electrical inspections will be conducted by a suitably qualified person and will include checks as recommended by the equipment Original Equipment Manufacturer (OEM) and will be completed no longer than 37 months from the date of the previous inspection.

Maximo will be used to capture recurring maintenance and inspection activities such as this and ensure they are completed within the specified timeframe. The WBESS Asset Manager will be responsible for ensuring the timeliness of these activities.

To ensure the inspection is done within the 37-month timeframe, the inspection will be scheduled at least 3 months in advance of the 37-month due date. The method and scope of the inspection will include at a minimum a visual patrol of the entire At-Risk Electric Line from the ground and/or drone with appropriate imaging capability. The following equipment will be inspected as part of the patrol:

- Line fittings
- Conductors
- Monopoles
- OPGW
- Foundation / Footings

Other inspections will be done as required based on advice from previous inspections, recent rectification work, fault event logs, and known At-Risk Electric Line condition. The WBESS Asset Manager will inspect the line inspection records, verify the work and formally complete the work in Maximo.

6.10. Details of process and procedures for ensuring inspector competencies — (regulation reference 6(j(i)) and 6(j(ii)))

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

The WBESS Asset Manager ensures anyone employed or engaged in respect of any activities connected with the WBESS operations and maintenance, including line inspections, possesses the appropriate skill, expertise, approvals and qualifications. The assessment is undertaken in accordance with the Site Access & HSSE Management Plan Wooreen Battery Energy Storage System Project (WESS-EA-10111-ABD040-0001). This plan states that work will not commence until all workers are suitably trained, accredited and deemed competent to undertake the specific work, and an up-to-date training and qualifications register will be maintained. It also states that for work requiring regulatory licences, the applicable licence must always be available during the work, and all workers must submit a copy of the licence which will be stored securely online via the Altora system.

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

All persons carrying out line inspections are employees or contractors of the WBESS Asset 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.

For all visual line inspection from the ground or using a drone, the worker must hold UET20621 (or an ESV accepted equivalent). If the inspection requires any climbing, then UET30521 (or ESV accepted equivalent) will be required.

6.11. Details of process and procedures for ensuring competency of other personnel (regulation reference 6(k))

Other personnel carrying out inspections, as part of normal operational activities on the At-Risk Electric Line, 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 WBESS At-Risk Electric Line.

The WBESS Asset Manager ensures anyone employed or engaged in respect of any activities connected with the WBESS operations and maintenance, including line inspectors, line workers, line auditors and vegetation workers, possesses the appropriate skill, expertise, approvals and qualifications. The WBESS Asset Manager will confirm compliance before work commences. The minimum qualifications required for persons performing in these roles is described below:

Table 2: Other personnel minimum qualifications

Task	Minimum required qualification
Vegetation control, clearance and removal	UET20321 Certificate II in ESI - Powerline Vegetation Control (or equivalent)
Overhead line power works	Certificate III in ESI – Power Systems – Transmission Overhead – UET30521 (or equivalent)
Auditing	Subject Matter Expert (SME) or completed nationally recognised auditor training

All workers will need to maintain their qualification and complete refresher training as required by the relevant RTO.

Similar to above, the assessment is undertaken in accordance with the Site Access & HSSE Management Plan Wooreen Battery Energy Storage System Project (WESS-EA-10111-ABD040-0001). Work will not commence until all workers are suitably trained, accredited and deemed competent to undertake the specific work, and an up-to-date training and qualifications register will be maintained. In a case where any worker is found to be performing work without the required training/competency, work will immediately stop and the non-conforming personnel removed from site. It also states that for work requiring regulatory licences the applicable licence must always be available during the work, and all workers must submit a copy of the licence which will be stored securely online via the Altora system. The Altora system tracks currency of competencies and will alert if any personnel's licence is no longer current.

All persons on site who are carrying out functions under the plan shall 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 WBESS Asset Manager undertakes auditing to verify site inductions, competencies, and site activities are compliant with the Plan.

6.12. Operation and maintenance plans for the At-Risk Electric Line (regulation reference 6(l))

The plan includes safeguards that enable the WBESS At-Risk Electric Line to continue to operate 24/7, including no auto-reclose devices on the At-Risk Electric Line.

6.12.1. In the Event of a Fire (i)

Operation plan:

- The At-Risk Electric Line will continue to operate as normal as it is designed to operate without substantial impairment, to ensure power supply is maintained.

Maintenance plan:

- Any non-essential planned critical asset maintenance activity will be cancelled to ensure that all available WBESS personnel can be called upon to assist with the fire response.
- Any required maintenance will be extensively risk assessed based on the conditions.

6.12.2. During a Day of Total Fire Ban (ii)

Operation plan:

- The At-Risk Electric Line will continue to operate as normal.
- Ensure all fire safety equipment and fire suppression systems are ready for implementation.

Maintenance plan:

- During a day of Total Fire Ban all At-Risk Electric 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.
- In the case of emergency maintenance that requires hot work, a fire permit will be obtained from the Country Fire Authority (CFA) and be noted on the hot work permit. The Authorised Issuing Officer (AIO) will liaise with the Recipient In Charge (RIC) apply for the permit, via the Fire Permits Victoria website, and ensure all work is being done in compliance with the CFA permit conditions.
- Any required maintenance will be extensively risk assessed based on the conditions.

6.12.3. During a Fire Danger Period (iii)

Operation plan:

- The At-Risk Electric Line will continue to operate as normal.
- The Fire danger Rating and weather will be monitored on a daily basis during the Fire Danger Period.

Maintenance plan:

- 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 At-Risk Electric Line. Any required vegetation removal will have been completed.
- In the case of emergency maintenance that requires hot work, a fire permit will be obtained from the Country Fire Authority (CFA) and be noted on the hot work permit. The Authorised Issuing Officer (AIO) will liaise with the Recipient In Charge (RIC) to apply for the permit, via the Fire Permits Victoria website, and ensure all work is being done in compliance with the CFA permit conditions.
- Any emergency vegetation cutting will be done as per the Electricity Safety (Electric Line Clearance) Regulations and appropriately risk assessed (by the AIO and RIC) based on the fire danger conditions. Note, there is a 40 meter wide easement around the At-Risk Electric Line and emergency vegetation removal is unlikely to be required.
    - Only the WBESS Asset Manager can authorise emergency vegetation, the AIO and RIC will be responsible for the quality of the work, including ensuring worker competencies.

- All vegetation clearing will be completed by personnel holding a UET20321 Certificate II in ESI - Powerline Vegetation Control (or equivalent).
- Fire prevention and suppression controls will be verified by the AIO and RIC.
- Risk mitigation strategies will be determined on a case-by-case basis but will include at a minimum, weather and fire danger monitoring.
- All non-essential work will be suspended if the Fire Danger Rating becomes high or extreme.
- The WBESS Asset Manager will be responsible for verifying completion of works, including verifying and recording of new vegetation clearances.

- Any required maintenance will be extensively risk assessed (by the AIO and RIC) based on the conditions.

6.13. Investigations, analysis and methodology to be adopted for mitigation of the risk of fire ignition from the At-Risk Electric Line (regulation reference 6(m))

WBESS fire incidents are reported and investigated in accordance with the Site Access & HSSE Management Plan Wooreen Battery Energy Storage System Project (WESS-EA-10111-ABD040-0001) using the WBESS incident management portal (Integrum).

The WBESS Site Access & HSSE Management Plan states that:

- All workers, including contractors and visitors have a responsibility to report all incidents into Integrum.
- Incidents involving fire must be reported to WorkSafe Victoria.
- All incidents are investigated to determine root and contributing causation factors, devise corrective actions to prevent or minimise the likelihood of reoccurrence, and identify and share learnings internally and externally.
- All corrective actions are assigned, tracked and reported.
- All records related to incident management and corrective action must be retained in accordance with legislative requirements.

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 (Energy Safe Victoria).

Wooreen Project Pty Ltd will investigate all fire ignitions originating from the At-Risk Electric Line under the investigation process described in this section.

The full process will be as per the below methodology:

Investigation Steps:

- Secure site and ensure safety as first priority
- Collect relevant information including time of incident, condition of At-Risk Electric Line, GPS location, asset IDs, and weather conditions. All information should be supported by photographic evidence where possible.
- Inspect any damaged assets.
- Retrieve SCADA and protection relay data.
- Perform root cause analysis based on investigation.

Documentation/ Reporting:

- Preparation of a root cause analysis report, including fault identification, and next steps.
- Submit all mandatory information to ESV.

Post-incident review:

- Conduct post incident workshop session with all involved team members to review effectiveness of current plans and note any lessons learned.
- Implement further preventative measures such as enhanced protection settings or asset upgrades.

- Investigation outcomes are used to reassess the relevant fire-ignition risks and existing controls.
- Corrective and preventative actions are developed to address root and contributing causes. These actions will be assigned to a responsible person to implement within a timeframe appropriate to the level of risk. All required actions will be tracked and reported through Maximo with completion and effectiveness verified.
- The effectiveness of the changes will be reviewed within a timeframe appropriate to the identified risk.
- Investigation outcomes will be used to update the BMP, inspection program, maintenance activities and other bushfire controls where required.
- All investigation records, including risk assessments, corrective actions and close-out records are to be retained in accordance with legislative requirements

6.14. Details of processes and procedures by which the Specified Operator will — (regulation reference 6(n))

Below are details of the processes and procedures by which the Wooreen Project Pty Ltd will take certain action.

6.14.1. Monitor the implementation of the Plan (i)

All required activities to achieve compliance with the plan will be entered into Maximo so that it can be completed at the appropriate frequency, in addition to rectification works where problems have been identified. Maximo will generate reports with all completed and outstanding activities. Maximo will generate alerts to WBESS personnel, including the WBESS Asset Manager in cases where activities have not been completed within required timeframes. The WBESS Asset Manager will be responsible for monitoring the completion of these activities, including the escalation of overdue items.

Additionally, a BMP register will be developed which captures all required activities of the BMP, their frequency, when they have been completed and by who.

There will be a dedicated activity within Maximo to capture that the plan implementation is to be reviewed on a biannual basis.

6.14.2. Audit the implementation of the Plan (ii)

There will be a dedicated activity in Maximo to capture the auditing of the plan on a yearly basis. The auditing process will involve assessing how successfully the plan has been implemented by looking at the completion of activities, incidents and the investigation of those incidents.

The WBESS Asset Manager will be involved in all audits. The audit will be completed internally by Wooreen Project Pty Ltd or EnergyAustralia on their behalf. The auditor will be qualified to the standard defined in section 6.11.

The audit scope will be compliance with the BMP based on Maximo work records and the BMP register. The outcome of the audit will be a report detailing the audit outcome and any areas of improvement or non-compliance. The WBESS Asset Manager will be responsible for assigning, tracking, verifying and closing resulting corrective actions.

6.14.3. Identify any deficiencies in the Plan or the Plan's implementation (iii)

The Plan will be reviewed annually prior to the commencement of the Fire Danger Period by Wooreen Project Pty Ltd, or by EnergyAustralia on their behalf.

Deficiencies in the BMP will be identified based on audit reports, documentation review by the WBESS Asset Manager, incident reports, and regulatory advice. The deficiencies are captured in a detailed manner to identify necessary process and BMP implementation improvement.

Deficiencies identified through audits or dedicated reviews will be recorded in the relevant Maximo activity. A separate Maximo activity will also be created and assigned to the WBESS Asset Manager to collate all deficiencies in a single location and manage them in accordance with the process defined in Section 6.14.4. All outcomes will be documented within the activity, and resulting actions, including updates to the BMP, will be tracked through Maximo.

6.14.4. Change the Plan to rectify any deficiencies identified (iv)

Deficiencies identified under Section 6.14.3 will be assessed to determine whether changes are required to the BMP, its implementation, or both. The required changes will be managed through the change-management process described below:

1. Initiate change
2. Risk assessment of the impact of potential change (done by site team)
3. Analysis of impact
4. Approval (by WBESS Asset Manager)
5. Implement, verify and close

Any changes to an accepted BMP will be submitted to ESV for review and acceptance.

A BMP will be submitted to ESV at an interval not exceeding five years from the most recent date of acceptance.

6.14.5. Monitor the effectiveness of inspections carried out under the Plan (v)

All contractors working on site are subject to routine inspections and audit under the Site Access & HSSE Management Plan Wooreen Battery Energy Storage System Project (WESS-EA-10111-ABD040-0001).

The WBESS Asset Manager will check and monitor the contractors 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.

The WBESS Asset Manager will monitor inspection activities performed by qualified personnel against the requirements of the BMP. Additionally, the inspection reports will be reviewed, and the WBESS Asset Manager will be responsible for implementing any required changes or work.

Effectiveness of the inspections will be determined based on the following Key Performance Indicators (KPIs):

- Number of incidents and severity
- Number of fire starts and severity
- Number of inspections, and what type (ground, climbing, ect)
- Number of line defects identified and severity

This activity will be completed by the WBESS Asset Manager and auditor as part of the annual plan audit as defined in section 6.14.2.

The BMP will be changed based on any deficiencies found as described in section 6.14.4.

6.14.6. Audit the Effectiveness of Inspections Carried Out Under the Plan (vi)

There will be a dedicated activity in Maximo to capture auditing the effectiveness of the inspections on a yearly basis. The Auditing process will involve assessing the KPIs as defined above and tracking against who is doing the inspections and their method.

The WBESS Asset Manager will be involved in all audits. The audit will be completed internally by Wooreen Project Pty Ltd or EnergyAustralia on their behalf. The auditor will be qualified to the standard defined in section 6.11.

The audit scope will be compliance with the BMP based on Maximo work records and the BMP register. The outcome of the audit will be a report detailing the audit outcome and any areas of improvement or non-compliance. The WBESS Asset Manager will be responsible for assigning, tracking, verifying and closing resulting corrective actions.

6.15. Policy in relation to the Assistance provided to Fire Control Authorities in investigation of fires near the At-Risk Electric Line (regulation reference 6(o))

Wooreen Project Pty Ltd , in conjunction with EnergyAustralia, 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 Wooreen Project Pty Ltd, CFA and FRV.

In addition, significant fires are also reported to WorkSafe Victoria. Should a significant fire be caused by a WBESS electrical asset, a report would also be provided to ESV.

The following will be provided by WBESS staff, as far as reasonably practicable, to fire control authorities in the case of investigating fires near the WBESS At-Risk Electric Line:

- Required staff will be made available to fire control authorities to answer questions related to the At-Risk Electric Line.
- The site HSSE representative will be made available to investigators.
- Areas of investigation will be made safe, through electrical switching and isolation, to allow the investigators access to all areas they require.

7. ESV exemptions

Wooreen Project Pty Ltd does not have any existing authorised ESV exemptions to the Electricity Safety (Bushfire Mitigation) Regulations with reference to the relevant electrical infrastructure (At-Risk Electric Lines) located at WBESS.

8. Accessibility of Documents

A copy of the ESV accepted 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 EnergyAustralia BESS website at https://www.energyaustralia.com.au/about-us/what-we-do/new-energy-projects/wooreen-energy-storage-system.

The Wooreen Project Pty Ltd principal Victorian office is located at 697 Collins Street, Docklands. A copy of the BMP is available for inspection at this location during business hours.

9. References

Document Number	Description	Revision	Date	Purpose of document
WESS-EA-10110-ABD040-0007	Fire Management Plan	1.1	04/02/2025	Referenced for information only
WESS-EA-10111-ABD040-0001	Site Access & HSSE Management Plan Wooreen Battery Energy Storage System Project	1.0	01/09/2024	Referenced for information only
WESS-ZEN-10110-ABD040-0002	Construction Environment Management Plan (CEMP)	2.0	13/08/2025	Referenced for information only
WESS-ZEN-10111-AQB070-0001	Occupational Health and Safety Management Plan (OHSMP)	5.0	25/08/2025	Referenced for information only
WESS-EA-10230-ABD040-0002	Wooreen Battery Energy Storage System Electric Line Clearance Plan	1.0	01/09/2026	Referenced for information only

Appendix A — WBESS Locality Map

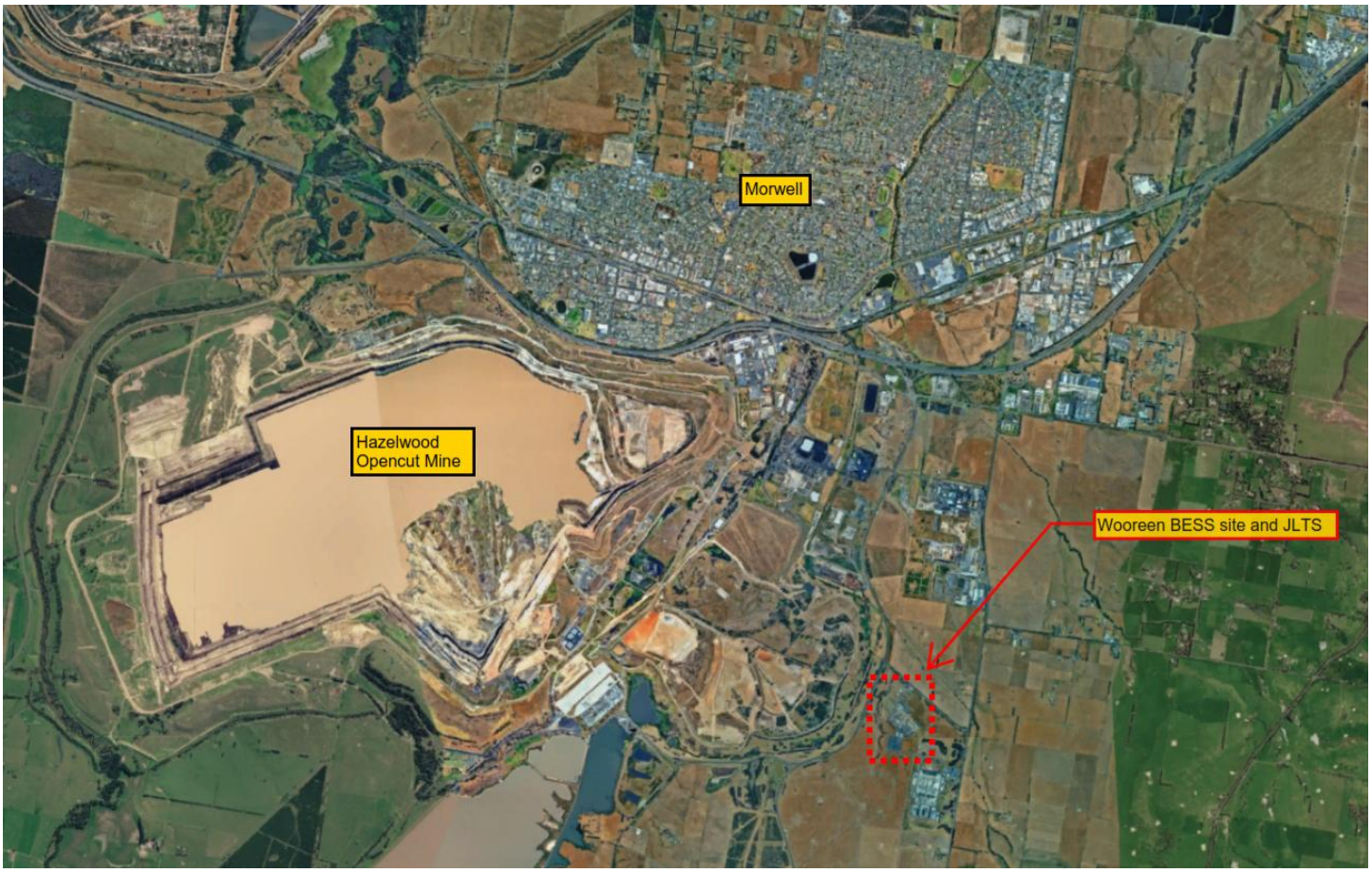


Figure 1: WBESS Locality

Appendix B — WBESS and At-Risk Electric Line

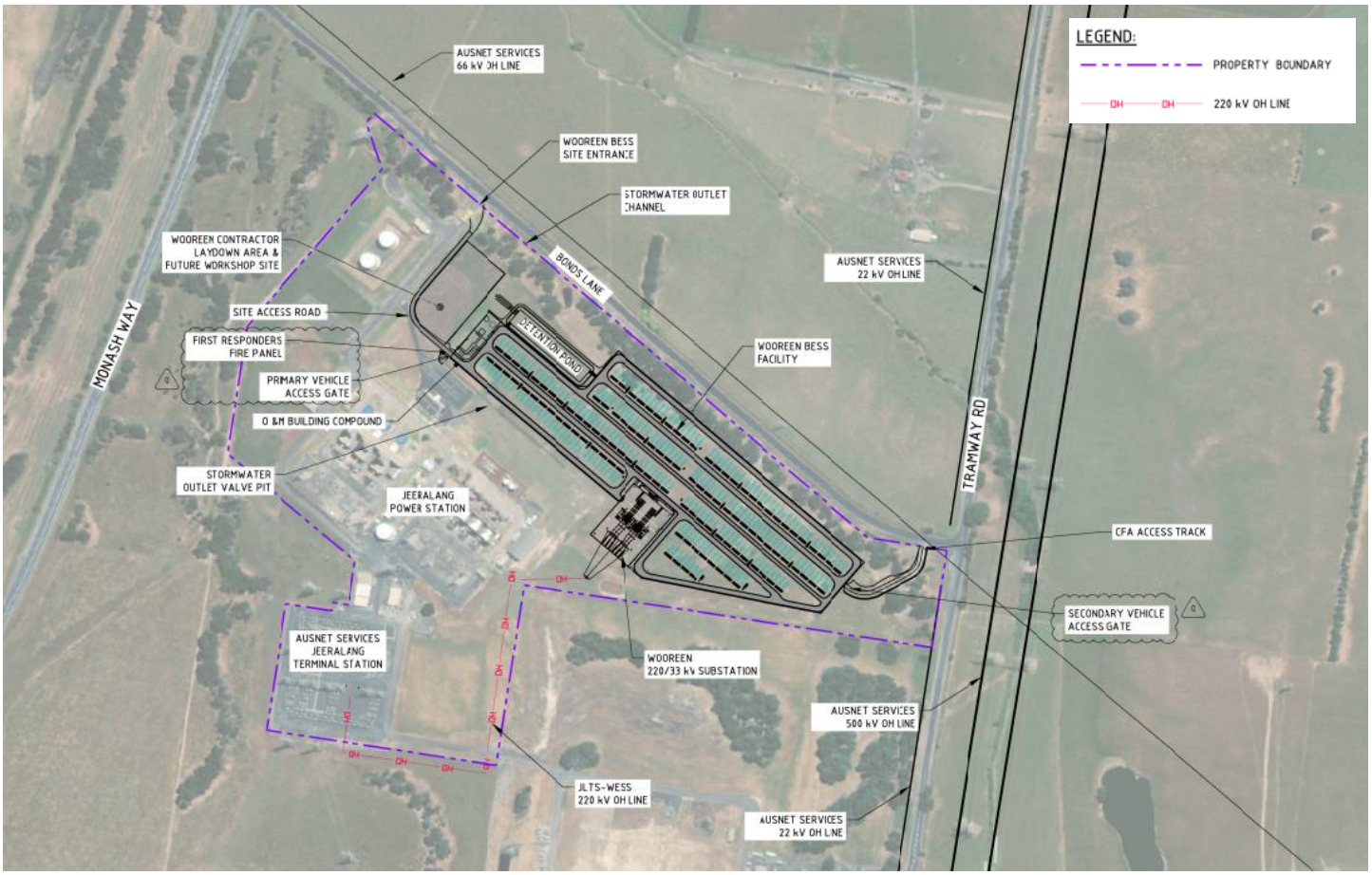


Figure 2: WBESS At-Risk Electric Line site plan

Register of WBESS At-Risk Electric Lines by line nomenclature

Line Nomenclature	Line Voltage	Concrete Poles	Wood Poles	Steel Monopole (31m+)	Line Length (m)	Year of Construction
WOES Line	220 kV	0	0	4	600	2026

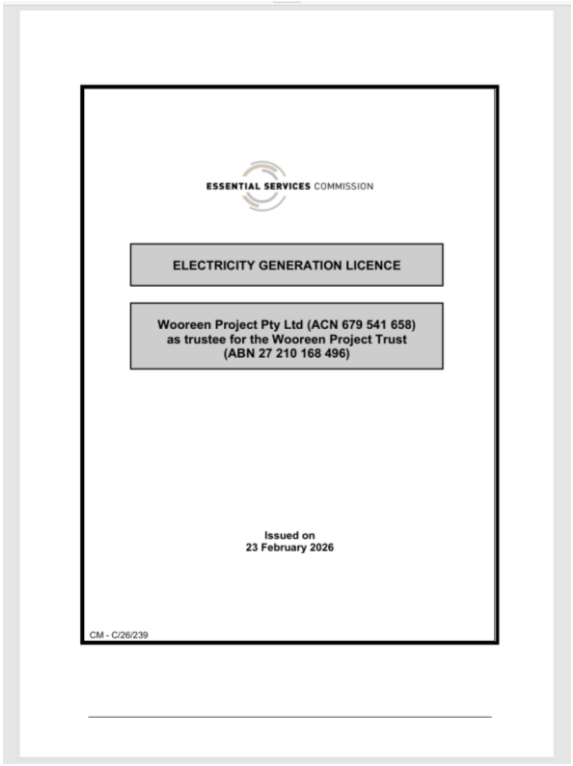
Register of WBESS At-Risk Electric Line by structure

Structure From	Structure To	Phases	Span Length (m)	Conductor
WOES Gantry	JLTS – WOES 4	3	57.4	TWIN 54/73.00 ACSR/GZ MANGO
JLTS – WOES 4	JLTS – WOES 3	3	84.8	TWIN 54/73.00 ACSR/GZ MANGO
JLTS – WOES 3	JLTS – WOES 2	3	219.4	TWIN 54/73.00 ACSR/GZ MANGO
JLTS – WOES 2	JLTS – WOES 1	3	162.5	TWIN 54/73.00 ACSR/GZ MANGO
JLTS – WOES 1	JLTS-220 kV Switchyard	3	66.1	TWIN 54/73.00 ACSR/GZ MANGO

Register of WBESS At-Risk Electric Line poles

Pole Name	Co-ordinates
JLTS – WOES 001	-38.277691, 146.424624
JLTS – WOES 002	-38.277912, 146.426459
JLTS – WOES 003	-38.275954, 146.426810
JLTS – WOES 004	-38.275968, 146.427779

Appendix C — Electricity Generation and Sale Licence



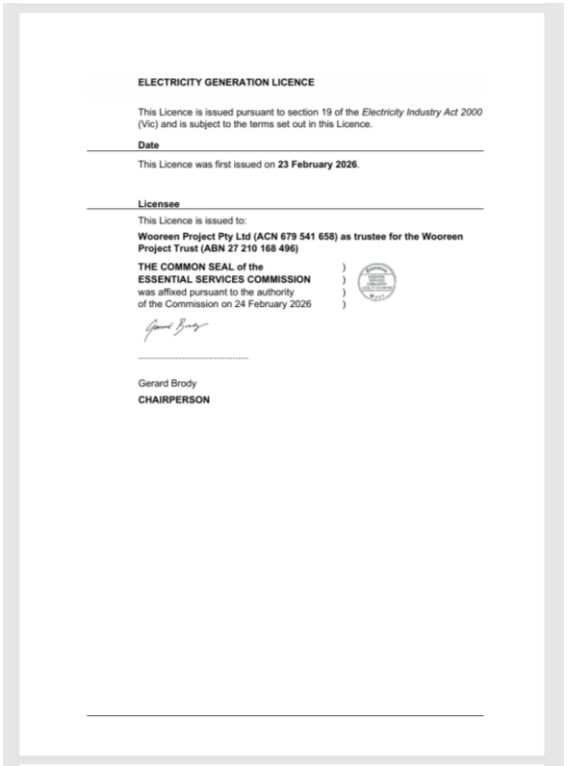
ESSENTIAL SERVICES COMMISSION

ELECTRICITY GENERATION LICENCE

Wooreen Project Pty Ltd (ACN 679 541 658) as trustee for the Wooreen Project Trust (ABN 27 210 168 496)

Issued on 23 February 2026

CM - C/26/239



ELECTRICITY GENERATION LICENCE

This Licence is issued pursuant to section 19 of the *Electricity Industry Act 2000* (Vic) and is subject to the terms set out in this Licence.

Date

This Licence was first issued on **23 February 2026**.

Licensee

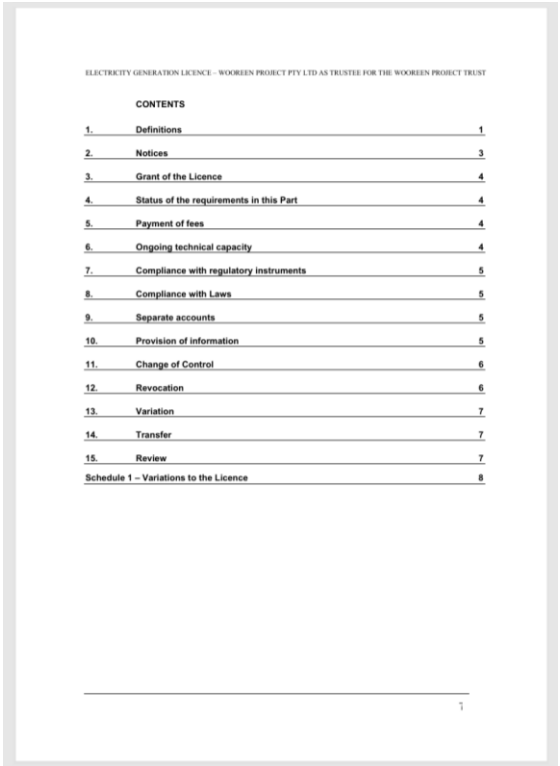
This Licence is issued to:

Wooreen Project Pty Ltd (ACN 679 541 658) as trustee for the Wooreen Project Trust (ABN 27 210 168 496)

THE COMMON SEAL of the ESSENTIAL SERVICES COMMISSION was affixed pursuant to the authority of the Commission on 24 February 2026)

Gerard Brody

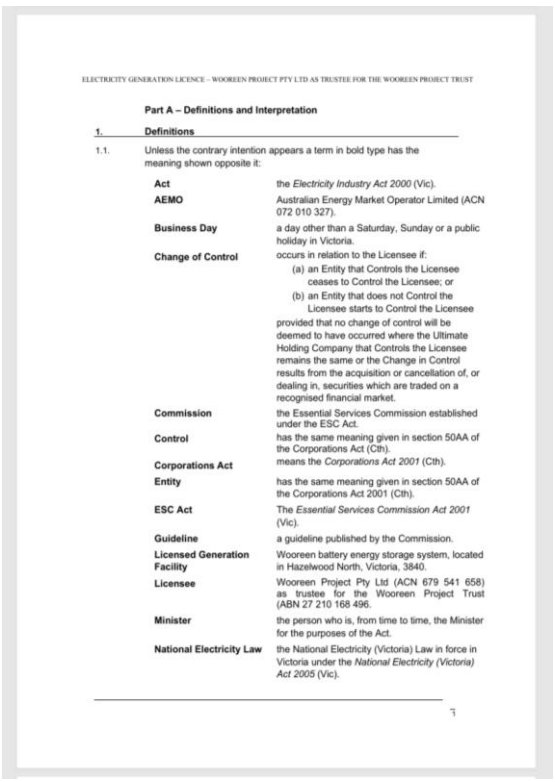
CHAIRPERSON



ELECTRICITY GENERATION LICENCE – WOOREEN PROJECT PTY LTD AS TRUSTEE FOR THE WOOREEN PROJECT TRUST

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Part A – Definitions and Interpretation

1. Definitions

1.1. Unless the contrary intention appears a term in bold type has the meaning shown opposite it:

Act	the *Electricity Industry Act 2000* (Vic).
AEMO	Australian Energy Market Operator Limited (ACN 072 010 327).
Business Day	a day other than a Saturday, Sunday or a public holiday in Victoria.
Change of Control	occurs in relation to the Licensee if: (a) an Entity that Controls the Licensee ceases to Control the Licensee; or (b) an Entity that does not Control the Licensee starts to Control the Licensee provided that no change of control will be deemed to have occurred where the Ultimate Holding Company that Controls the Licensee remains the same or the Change in Control results from the acquisition or cancellation of, or dealing in, securities which are traded on a recognised financial market.
Commission	the Essential Services Commission established under the ESC Act.
Control	has the same meaning given in section 50AA of the Corporations Act (Cth).
Corporations Act	means the *Corporations Act 2001* (Cth).
Entity	has the same meaning given in section 50AA of the Corporations Act 2001 (Cth).
ESC Act	The *Essential Services Commission Act 2001* (Vic).
Guideline	a guideline published by the Commission.
Licensed Generation Facility	Wooreen battery energy storage system, located in Hazelwood North, Victoria, 3840.
Licensee	Wooreen Project Pty Ltd (ACN 679 541 658) as trustee for the Wooreen Project Trust (ABN 27 210 168 496.
Minister	the person who is, from time to time, the Minister for the purposes of the Act.
National Electricity Law	the National Electricity (Victoria) Law in force in Victoria under the *National Electricity (Victoria) Act 2005* (Vic).

National Electricity Rules	the rules of that name as in force from time to time under the National Electricity Law.
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.
Subsidiary	has the meaning given in the Corporations Act.
Ultimate Holding Company	means, in relation to an entity, an entity that: (a) is a Holding Company of the first-mentioned entity; and (b) is itself a Subsidiary of no entity.

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 this 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 this Licence;

(f) a reference to any statute including the Act and regulation, proclamation, Order in Council, ordinance or by-law includes all statutes, regulations, proclamations, Orders in Council, ordinances or by-laws varying, consolidating, re-enacting, extending or replacing them and a reference to a statute includes all regulations, proclamations, Orders in Council, ordinances, by-laws and determinations issued under that statute;

(g) a reference to a document or a provision of a document includes an amendment or supplement to, or replacement or novation of, that document or that provision of that document;

(h) a reference to a person includes that person's executors, administrators, successors, substitutes (including, without limitation, persons taking by novation) and permitted assigns;

(i) other parts of speech and grammatical forms of a word or phrase defined in this Licence have a corresponding meaning;

(j) a period of time:

(i) which dates 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

(k) an event which is required under this Licence to occur on or by a stipulated day which is not a Business Day may occur on or by the next Business Day.

2. Notices

2.1. A notice under this Licence is only effective if it is in writing, and dealt with as follows:

(a) if given by the Licensee to the Commission – addressed to the Chief Executive Officer of the Commission at the physical or email address specified below or as otherwise notified by the Commission:

Essential Services Commission
Level 8, 570 Bourke Street
Melbourne VIC 3000

licences@esc.vic.gov.au; or

(b) if given by the Commission to the Licensee – given by the Chief Executive Officer of the Commission and addressed to (and marked for the attention of) the Company Secretary of the Licensee at the physical or email address specified below or as otherwise notified by the Licensee:

Wooreen Project Pty Ltd as trustee for the Wooreen Project Trust
Level 19, Two Melbourne Quarter,
697 Collins St,
Docklands VIC 3008.

wooreen.notices@energyaustralia.com.au

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 pre-paid post; or

(c) transmitted electronically by or on behalf of the person giving the notice by electronic mail.

2.3. A notice is deemed to be received:

(a) if delivered by hand – upon delivery to the relevant address;

(b) if sent by post – upon the confirmation of delivery of the notice by the relevant delivery services, or in accordance with section 160(1) of the *Evidence Act 2008 (Vic)*, whichever is earlier;

(c) if transmitted electronically – in accordance with the *Electronic Transactions (Victoria) Act 2000* (Vic).

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.

Part B – Licence conditions

3. Grant of the Licence

3.1. In exercise of its powers under section 19 of the Act, the Commission grants the Licensee a licence to generate electricity for supply or sale on the terms and conditions set out in this Licence.

3.2. This Licence only permits the Licensee to generate electricity at the Licensed Generation Facility.

3.3. This Licence was granted on 23 February 2026 and has been varied on the dates set out in Schedule 1.

Part C - Conditions of the Licence

4. Status of the requirements in this Part

4.1. A failure on the part of the Licensee to meet any of the requirements set out in this Part C is a breach of a civil penalty requirement for the purposes of the ESC Act.

5. Payment of fees

5.1. The Licensee must pay a licence fee as determined by the Minister in accordance with the provisions of section 22 of the Act.

6. Ongoing technical capacity

6.1. The Licensee must at all times maintain such technical capacity as is:

(i) required to meet the obligations under this Licence; and

(ii) reasonably required to undertake the activities authorised by this Licence; and

6.2. In this clause 6, activities undertaken pursuant to this Licence include any activities undertaken by a contractor, subcontractor, agent or other third party (a third party) engaged by the Licensee for the purpose of enabling the Licensee to undertake the activities authorised by this Licence.

6.3. The Licensee must ensure that any contract, entered into with any third parties for the performance of licensable functions, contains such provisions as are necessary to ensure the third party provides its services in a way that enables the Licensee to comply with the requirements of this Licence and this clause 6.

7. Compliance with regulatory instruments

7.1. Subject to clause 7.2, the Licensee must comply with any procedure or Guideline issued by the Commission from time to time that is expressed as being one with which the Licensee must comply, to the extent they are applicable to activities undertaken by the Licensee pursuant to this Licence.

7.2. The Commission may, from time to time, by written notice grant an exemption in relation to or otherwise modify the application of some of the requirements of the instruments referred to in clause 7.1.

7.3. The Licensee must have in place an adequate system for monitoring compliance with this Licence and the instruments referred to in clause 7.1.

7.4. The Licensee must be registered as a generator with AEMO or exempt from the requirement to be registered as a generator in accordance with the National Electricity Rules.

8. Compliance with Laws

8.1. The Licensee must comply with the National Electricity Law and the National Electricity Rules.

9. Separate accounts

9.1. If the Licensee holds more than one category of licence under Part 2 of the Act, the Licensee must prepare separate accounts for each part of its business in respect of which it has been granted a separate licence.

10. Provision of information

10.1. The Licensee must maintain comprehensive records regarding any activities undertaken pursuant to this Licence for a period of at least 7 years.

10.2. The Licensee must notify the Commission of any breach by it of the conditions of this Licence including any of the instruments referred to in clause 7.1 as soon as reasonably practicable after becoming aware of the breach.

10.3. The Licensee 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 their functions or the exercise of their powers under the Act in the manner and form specified by AEMO.

10.4. The Licensee 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.

10.5. The Licensee must, as soon as reasonably practicable, provide the Commission with information on its ongoing technical capacity or financial viability to undertake the activities authorised by this Licence as the Commission may property request in connection with the performance of its functions or the exercise of its powers under the Act and in a manner and form specified by the Commission.

10.6. In this clause 10:

(a) activities undertaken pursuant to this Licence includes any activities of that type undertaken by a contractor, subcontractor, agent or other third party (a third party) engaged by the Licensee for the purpose of enabling the Licensee to undertake the activities authorised by this Licence; and

(b) information includes information in the possession, custody or control of any third party.

11. Change of Control

11.1. The Licensee must give the Commission a notice if any event occurs, any decision by the Licensee is made, or any other circumstances exists that will effect a Change of Control of the Licensee.

11.2. The notice required under condition 11.1 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 Licensee becomes aware of the event or circumstance or makes the decision.

12. Revocation

12.1. The Commission may revoke this Licence:

(a) at any time at the request of, or with the consent of, the Licensee; or

(b) in accordance with the Act.

12.2. Where the Commission proposes to revoke this Licence, the Commission will issue a notice to the Licensee, specifying:

(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 events 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.

12.3. The Commission must consider any submissions received by the Licensee prior to making a decision to revoke the Licence.

12.4. 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 12.2

and this Licence will be revoked on the date specified in the notice.

13. Variation

13.1. The Commission may vary this Licence in accordance with section 29 of the Act.

14. Transfer

14.1. This Licence may be transferred in accordance with section 31 of the Act.

15. Review

15.1. 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.

15.2. Following a direction pursuant to clause 15.1, the Licensee must obtain the Commission's approval of the independent reviewer and the scope, timing and methodology of the Review.

15.3. 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.

15.4. The Licensee must comply, and must require the independent reviewer to comply, with any Guidelines issued by the Commission dealing with Reviews.

Schedule 1 – Variations to the Licence

Date	Variation
	This Licence has not been varied.

EnergyAustralia Pty Ltd ABN 99 086 014 968.
Locked Bag 14060, Melbourne, Vic. 8001

EnergyAustralia
LIGHT THE WAY