



**Application for Authorisation Under *s88(1)*  
of the *Competition and Consumer Act 2010***

Lodged by:

**Large Format Retail Association Limited (LFRA) & Ors**

In respect of:

**Establishing a Joint Electricity Purchasing Group and  
Jointly Negotiating Energy Supply Agreements**

**6<sup>th</sup> August 2019**

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## 1.0 Executive Summary

This Application is made by the Large Format Retail Association (**LFRA**), on behalf of itself and current and future members of the proposed LFRA joint electricity buyers group described in this Application (**Buyers Group**) (together, the **Participating Members**), being large scale users of electricity which operate in the Large Format Retail sector. The current members of the LFRA joint electricity buyers group are set out in Annexures A and B to this Application.

The Participating Members seek interim and final authorisation under *section 88(1)* of the *Competition and Consumer Act 2010* (Cth) (**CCA**) to engage in the proposed conduct described in detail in section 4.0 of this Application (**Proposed Conduct**). The Proposed Conduct includes establishing the Buyers Group to pool the individual electricity demand of Participating Members and collectively invite tenders from and negotiate with electricity suppliers, enter into individual electricity supply agreement(s) with the preferred supplier(s) on the same (or substantially similar terms), and participate in joint activities and decisions regarding the operation and administration of the electricity supply agreement(s).

This Application is being made in response to rapidly increasing prices for electricity faced by Participating Members, which is having a significant adverse impact on their commercial business operations (refer to section 2.0 of this Application for further industry context on these current challenges). The Participating Members consider that pooling their electricity demand will allow them to achieve a sufficient scale to access more competitive offers from electricity suppliers than would be possible from individual negotiations.

This Application is considered necessary in the present electricity supply market in Australia, which the Federal Government, the Australian Energy Regulator and the ACCC has each acknowledged is not presently operating in the most efficient manner for the benefit of end-users. The Proposed Conduct is anticipated to result in material public benefits and will not result in material public detriments.

As set out in section 7.0 of this Application, the likely public benefits from the Proposed Conduct include transaction costs savings, increased competition for the supply of electricity, increased incentives for investment in generating capacity, and the potential for electricity costs savings for Participating Members to improve their competitiveness and benefit their downstream customers.

## 2.0 Background and Industry Context

Having access to competitively priced and reliable electricity supply is critical to each of the Participating Members and their ongoing business operations.

The ACCC's Retail Electricity Pricing Inquiry Final Report dated June 2018 (**Final Report**) relevantly identified significant challenges currently facing Australian business customers in relation to electricity markets, and the important role that collective buying groups can play in the ongoing commercial viability of participating businesses, including recognising that:

- i. *"...Electricity prices for businesses are... increasing rapidly, threatening their viability".<sup>1</sup> "Medium-sized businesses [have faced] dramatically increasing electricity costs, which have been reported anecdotally to the Inquiry of 200 – 300 per cent from their most recent offers".<sup>2</sup> "Submissions from industrial users... confirm that they have seen substantial increases, in some cases a doubling or tripling, against their most recent electricity offer..."<sup>3</sup>*
- ii. *"...Increasing electricity costs have reduced the capacity of some businesses to grow or to stay competitive, and... passing on electricity costs to their customers is frequently not possible..."<sup>4</sup>*
- iii. *"...In response to higher retail prices, a number of groups of businesses have sought authorisation from the ACCC to collectively bargain for electricity... to create scale among the group by pooling their electricity demand to seek more competitive offers from suppliers..."<sup>5</sup>*
- iv. *"...Larger businesses, faced with higher electricity costs, have been doing what they can to lower these costs through formation of buying groups... There are some examples of these measures being effective, however it appears that more support for these arrangements could further reduce pressure on businesses' electricity costs..."<sup>6</sup>*
- v. *"...The ACCC is generally supportive of buying groups for electricity...", which "...can be an important avenue to new entry and consequently a new source of competition in wholesale markets..."<sup>7</sup>*

While the Final Report makes a number of recommendations which the ACCC considers may reduce prices and restore consumer confidence in electricity supply, it

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<sup>1</sup> Final Report, page 1.

<sup>2</sup> Final Report, page 348.

<sup>3</sup> Final Report, page 350.

<sup>4</sup> Final Report, page 336.

<sup>5</sup> Final Report, page 349.

<sup>6</sup> Final Report, page xiv. See also Final Report, p99: "In recent times, smaller retailers and some corporate and industrial users have also backed new projects. For example... we have seen the successful culmination of the South Australian Chamber of Mines and Energy's (SACOME) process to jointly procure energy on behalf of some of its members through an agreement with SIMEC ZEN Energy... The ACCC welcomes these developments as they are bringing additional generation capacity to the market and enabling these customers to directly benefit from that generation through competitive prices..."

<sup>7</sup> Final Report, page 350.

is likely that their impact, if implemented, may not be realised in the short to medium term. The Participating Members consider that the Proposed Conduct provides an important solution to the immediate challenges faced by Participating Members in their individual acquisition of electricity, in advance of the further development and implementation of any such recommendations.

The ACCC has previously authorised the following similar collective bargaining and joint purchasing arrangements for electricity:

- i. On 22 November 2017, the ACCC authorised the Eastern Energy Buyers Group (**EEGB**), on behalf of its current and future members, to establish a joint energy purchasing group combining gas and electricity requirements, for a period of 11 years.<sup>8</sup> The ACCC found that the proposed conduct was likely to result in public benefits including transaction costs savings, potential for increased competition for the supply of electricity and gas, and incentives for investment in generating capacity.
- ii. On 17 May 2017, the ACCC authorised the South Australian Chamber of Mines and Energy (**SACOME**) and other organisations to form a joint electricity purchasing group in South Australia, for a period of 11 years.<sup>9</sup> The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings and greater competition for generation and wholesale supply of electricity in South Australia. On 8 June 2018, SACOME announced that the joint purchasing group had awarded a long-term supply contract to renewable energy retailer SIMEC ZEN Energy.<sup>10</sup>
- iii. On 27 July 2016, the ACCC authorised the Melbourne City Council and others to establish a joint electricity purchasing group, including running a joint tender, for a period of 15 years.<sup>11</sup> The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, economies of scale, the potential for increased competition for the supply of renewable electricity, and environmental benefits.

### 3.0 Parties to the Proposed Conduct

#### a. Applicant

The Applicant is the LFRA, on behalf of itself and current and future members

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<sup>8</sup> Authorisations A91594 and A91595.

<sup>9</sup> Authorisations A91567 and A91568.

<sup>10</sup> See <https://www.sacome.org.au/sacome-joint-electricity-purchasing-group-awards-long-term-supply-contract-to-sanjeev-guptas-simec-zen-energy.html>

<sup>11</sup> Authorisations A91532 and A91533.

of the Buyers Group (together, the **Participating Members**).

**b. Description of Business Activities**

The LFRA is the national peak industry association for Australia's Large Format Retail sector, otherwise known as 'Big Box' retail. The LFRA advocates for clarity, consistency and certainty of legislation and regulations affecting the Large Format Retail sector.

Members of the LFRA include Large Format Retailers, as well as owners, developers, investors and service suppliers which operate in the sector. Other than the LFRA itself, the Participating Members of the Buyers Group are mostly large-scale users of electricity which operate in the Large Format Retail sector, being members of the LFRA which have separately agreed to participate in this Application.

A list of current Participating Members, their contact details and a description of their business activities, is set out in Attachment 1.

**c. Applicant's Address for Service**

The Applicant's address for service of documents in respect of this Application is:

Philippa Kelly  
Chief Executive Officer  
Large Format Retail Association Limited  
Postal: PO Box 78, Balwyn North Victoria 3104  
Suite 10, 828 High St, Kew East, Victoria 3102  
Phone: (03) 9859 5000  
Email: pkelly@lfra.com.au

**d. Other Persons Who Propose to Engage in the Proposed Conduct**

In addition to the current Participating Members listed in Attachment 1, other persons who may seek to engage in the Proposed Conduct include:

- i. **Future Buyers Group Members:** The Buyers Group may wish to permit additional entities which are members of the LFRA to join the Buyers Group in the future, and have the benefit of the authorisation, provided that the total electricity consumption of the Buyers Group does not exceed 1% of electricity consumption in any State or Territory in Australia; and
- ii. **Successful Tenderer(s):** Following completion of the tender process, the successful tenderer(s) will be the other party to the relevant electricity

supply contracts with Participating Members of the Buyers Group. As described in further detail below, each Participating Member will enter into a separate agreement with the relevant electricity supplier(s).

## 4.0 The Proposed Conduct

### a. Description of the Proposed Conduct

The Participating Members seek authorisation to pool their individual demands for electricity and form the LFRA joint electricity Buyers Group to collectively negotiate with electricity suppliers, to secure cost competitive and reliable electricity supply. It is proposed that the Participating Members will conduct a tender process for the supply of their aggregated electricity loads. It is intended that Participating Members would each enter into a contract for the supply of electricity with the successful tenderer, each being on the same (or substantially similar) terms and conditions.

In particular, the Participating Members seek authorisation to:

- i. Collectively consider potential electricity supply options for the pooled electricity load of the Participating Members;
- ii. Collectively conduct a tender process for the supply of the pooled electricity loads in order to select an electricity supplier(s) to supply their pooled electricity loads;
- iii. Collectively negotiate an electricity supply contract with preferred electricity supplier(s);
- iv. Enter into individual electricity supply agreements with the preferred electricity supplier(s) on the same (or substantially similar) terms and conditions; and
- v. Following entry into individual supply agreements, participate in joint activities and decisions regarding the operation and administration of the agreement(s), including performance and/or pricing reviews, events which materially impact the performance of the agreement, the exercise of contract options, or any changes to terms and conditions.

(the **Proposed Conduct**).

### b. Tender Process

Subject to the Proposed Conduct being authorised and the completion of consideration of potential electricity supply options, including any advice from legal, financial or technical advisers, and agreement by Participating Members:

- i. The tender process is expected to be broadly conducted as follows:
  - A. The tender will invite proposals from electricity suppliers to supply electricity to each of the Participating Members to meet their collective electricity requirements;
  - B. The tender process will operate as an open tender, where any suitably qualified electricity supplier may respond to the tender;
  - C. An electricity supplier may choose to respond to the entire tender or respond to part of the tender (for example, to the supply of electricity in a limited number of states and territories only);
  - D. The responses to the tender will be reviewed and the successful electricity supplier(s) chosen on the basis of price and terms;
  - E. There may be more than one successful electricity supplier chosen;
  - F. Terms and conditions (including price) of the proposed electricity supply agreement will be negotiated with the successful electricity supplier(s);
  - G. Each Participating Member will have the right, but not the obligation, to enter into a separate electricity supply agreement with a successful electricity supplier; and
  - H. Each Participating Member may, in its absolute discretion and subject to its internal governance and approval processes, accept the terms and conditions of the electricity supply agreement negotiated as part of the tender process or to seek to negotiate such terms further.
- ii. It is expected that the board of LFRA will be responsible for key matters and decisions in relation to the tender process.

**c. Ongoing Administration of Electricity Supply Agreements**

Once agreed, it is intended that each Participating Member will be primarily responsible for administering its own electricity supply agreement with the preferred supplier(s) without ongoing consultation with other Participating Members. However, it may be necessary for Participating Members to participate in some joint activities and decisions regarding the operation and administration of the electricity agreements, including performance and/or pricing reviews, events which materially impact the performance of the



agreement, the exercise of contract options, and any changes to terms and conditions.

**d. Provisions of the CCA Which May Apply to the Proposed Conduct**

Some or all of the Participating Members may be considered to be competitors in the acquisition of electricity for the purposes of the CCA. It is possible (although Participating Members do not concede) that making and giving effect to the arrangements comprising the Proposed Conduct could potentially be challenged on the basis that they contain provisions that may contravene the prohibitions on cartel conduct under sections 45AF, 45AG, 45AJ, and 45AK of the CCA, for example provisions:

- i. Having the purpose, effect or likely effect of fixing, controlling or maintaining the price of goods or services to be acquired by Participating Members; or
- ii. Having the purpose of allocating between Participating Members the persons or classes of persons who are likely to supply goods or services to Participating Members.

The Participating Members wish to have certainty provided by authorisation that the Proposed Conduct does not contravene these prohibitions, and also cannot be challenged on the basis that it has the purpose, effect or likely effect of substantially lessening competition in contravention of s45 of the CCA, or the exclusive dealing provisions in s47 of the CCA.

**e. Rationale for the Proposed Conduct**

In response to higher electricity retail prices, the Participating Members wish to pool their individual demands for electricity to collectively negotiate as a Buyers Group, creating scale that would allow them to seek more competitive offers from suppliers than they would likely receive individually, thereby reducing electricity costs for Participating Members.

In the event that this Application is not authorised, the Participating Members would be likely to continue to independently negotiate and secure electricity supply from electricity retailers at prices potentially significantly higher and terms less favourable than available under any joint purchasing arrangement. Participating in the wholesale market is generally unattractive for Participating Members, including having regard to the price volatility and difficulty of effectively hedging against that risk using electricity derivatives or other arrangements, having regard to the relatively small size of their individual loads.

Accordingly, if the Proposed Conduct is not authorised, Participating Members are likely to face higher transaction costs and higher electricity costs, which may

be passed onto customers through higher prices for goods or services supplied by Participating Members and/or negatively impact the ongoing commercial operations of Participating Members.

**f. Term of Authorisation Sought**

The Participating Members seek authorisation for a total period of 11 years, comprising:

- i. a six to twelve month period in relation to the joint tender process;
- ii. a three to five year period for the initial term of each electricity supply agreement between the preferred electricity supplier(s) and each Participating Member; and
- iii. a further three to five year period to cover a potential extension of the term of the electricity supply agreement(s).

**g. Application for Interim Authorisation**

Participating Members also seek interim authorisation to expeditiously undertake the initial phases of Proposed Conduct as set out in sub-sections 4(a)(i), (ii) and (iii) above (i.e. collectively considering potential electricity supply options, conducting the tender process and negotiating with preferred electricity supplier(s)), prior to the ACCC making a final determination in relation to the Application. Participating Members will not enter into any electricity supply agreement unless and/or until the ACCC provides a final determination authorising the Proposed Conduct.

The Participating Members submit that it is appropriate for the ACCC to grant interim authorisation, including for the following reasons:

- i. As the initial phases of the tender process will not involve the entry into any final agreements by any of the Participating Members, it will have no actual impact on the purchasing behaviour of any of the Participating Members, and consequently will not have any material impact on any relevant market;
- ii. In circumstances where the Participating Members are all presently exposed to substantially higher electricity prices than has been historically payable, it is commercially imperative that the Participants Members be permitted to commence the tender process as soon as possible, so as not to delay the commercial benefits of lower electricity prices should authorisation be granted; and
- iii. The grant of interim authorisation will bring forward the realisation of the material public benefits of the Proposed Conduct (as detailed in Section

7.0), without attracting any additional material public detriments (as outlined in Section 8.0), other than the minor inefficiency of commencing a tender and negotiation process without being able to conclude an electricity supply contract in the event that the ACCC ultimately denied authorisation – this potential inefficiency would be addressed by the Participating Members notifying each electricity supplier that a concluded electricity supply contract would only be concluded in the event that authorisation was granted.

## 5.0 Persons Who May Be Directly Impacted by Proposed Conduct

Other than the Participating Members (both current and future), the class of persons directly impacted by the Proposed Conduct include electricity suppliers, which will have the opportunity to participate in tender process described above. The tender process will be open and technology neutral, which will ensure there will be competition between electricity suppliers to win the contracts.

## 6.0 Market Information and Concentration

### a. Electricity Related Markets

Relevant electricity related markets include:

- i. A market for the generation and wholesale supply of electricity in the NEM, or, in the alternative, in one or more regions of the NEM;
- ii. A market for the generation and wholesale supply of electricity in the Western Australian Wholesale Electricity Market (**WEM**);
- iii. A market for the retail supply of electricity to commercial and industrial customers in the Northern Territory.

The NEM is the wholesale electricity spot market through which generators sell electricity in Queensland, New South Wales, the Australian Capital Territory, Tasmania and South Australia, with prices determined by changes in the supply and demand balance. The main customers in the NEM are electricity retailers, which bundle electricity with network services for sale to residential, commercial and industrial energy users.<sup>12</sup> Larger customers, including retailers, can hedge their electricity positions through electricity derivative contracts.

In Financial Year 2017-18, the total consumption of electricity in the NEM was 196.2 terawatt hours (**TWh**), of which Queensland consumed 55.8 TWh, New

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<sup>12</sup> Australian Energy Regulator, National Electricity Market:  
<https://www.aer.gov.au/system/files/Chapter%201%20National%20electricity%20market.pdf>

South Wales 71.3 TWh, Victoria 45.6 TWh, South Australia 12.6 TWh, and Tasmania 11.0 TWh.<sup>13</sup>

In Western Australia, the relevant wholesale market is the Wholesale Electricity Market, which supplies around 18 TWh of electricity each year.<sup>14</sup>

In the Northern Territory, total consumption of electricity is approximate to 2.99 TWh<sup>15</sup>.

The current combined electricity load of the Participating Members accounts for a small proportion of the total consumption in the NEM, WEM, and the Northern Territory, such that the Proposed Conduct would not have any significant impact on competition in any relevant electricity related market, regardless of the precise market definition. In particular, the Participating Members' combined electricity demand during Calendar Year 2018 amounts to less than 0.48% of total electricity consumption in the NEM, 0.48% of total consumption in the WEM and 0.33% of total consumption in the Northern Territory (based on the total consumption of electricity in each market during Financial Year 2017-18).

#### **b. Downstream Supply of Goods or Services by Participating Members**

While there may be some degree of overlap between some Participating Members in the supply of goods or services in the downstream Large Format Retail sector, the Proposed Conduct will not reduce competition in any relevant downstream market(s), and if anything may be procompetitive, including because:

- i. to the extent that the Proposed Conduct results in Participating Members acquiring electricity at a lower price, there is the potential for Participating Members to compete more vigorously in the supply of goods or services to their own customers, for example by passing on the cost reduction in the form of lower prices, or otherwise investing in improving product offerings, expanding their range of products or strengthening the viability of their commercial operations; and
- ii. any information sharing between Participating Members will be limited to the acquisition of electricity the subject of the Proposed Conduct. Given this restriction, and the discipline that Participating Members will continue to face from ongoing competition in downstream retail

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<sup>13</sup> Australian Energy Regulator, Electricity supply to regions of the National Electricity Market: <https://www.aer.gov.au/wholesale-markets/wholesale-statistics/electricity-supply-to-regions-of-the-national-electricity-market>

<sup>14</sup> <https://www.aemo.com.au/Electricity/Wholesale-Electricity-Market-WEM>

<sup>15</sup> [https://www.energy.gov.au/sites/default/files/australian\\_energy\\_update\\_2018.pdf](https://www.energy.gov.au/sites/default/files/australian_energy_update_2018.pdf)

market(s) in which they participate, the likelihood of lessening of competition from an increased risk of coordination between Participating Members is negligible.

## 7.0 Public Benefit

‘Public Benefit’ is not defined in the CCA, however, it has been interpreted broadly to include:

*“... anything of value to the community generally, any contribution to the aims pursued by the society including as one of its principal elements... the achievement of the economic goals of efficiency and progress...”*<sup>16</sup>

The Proposed Conduct will provide a range of public benefits, which include:

- i. **Transaction Cost Savings** arising as a result of the collective negotiation process reducing the transaction costs incurred by the Participating Members and potential suppliers. In particular, each Participating Member individually tendering and contracting for their electricity supply would incur higher transaction costs than those likely to be incurred under the Proposed Conduct, including the time taken to negotiate and obtaining technical, legal or other advice. Potential suppliers would also incur higher transaction costs in negotiating with Participating Members individually. The joint tender process to collectively negotiate with and identify a successful electricity supplier (or suppliers) is likely to result in public benefits in the form of transaction cost savings, including through the sharing of costs between Participating Members;
- ii. **Increased Competition for the Supply of Electricity:** The combined electricity demands of Participating Members and the length of the electricity supply contracts proposed to be negotiated are likely to encourage strong competition between electricity suppliers to respond to the invitation to tender, enabling Participating Members to seek more competitive pricing and terms than if Participating Members negotiated electricity supply contracts individually. This increase in competition may also assist in ensuring reliability of supply and greater price certainty for Participating Members, including due to the longer term nature of the proposed agreements sought to be entered;
- iii. **Increased Incentives for Investment in Generating Capacity:** The ACCC has previously accepted that a single supply arrangement has the potential to result in greater economies of scale than multiple individual supply arrangements, where production costs per unit of production fall as the volume generated

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<sup>16</sup> *Queensland Cooperative Milling Association Ltd* (1976) ATPR 40-012 at 17,242.

increases. For example, the ACCC recognised that the volume of electricity sought to be collectively acquired:

- A. by the SACOME joint purchasing group (16% of South Australian electricity load) may achieve the scale necessary for investment in new generation; and
- B. by EEBG (0.38% of Victorian electricity consumption and 0.75% of Victorian gas consumption) may incentivise investment in new generation, for example a small-scale PPA, notwithstanding that EEBG did not have the explicit incentive of incentivising new supply option.

Similarly, Participating Members' combined load of approximately 1,032,511 MWh may also incentivise new generation. Further, authorisation is sought to enable future Participating Members to join the Buyers Group, provided that the combined electricity consumption of the Buyers Group does not exceed 1% of electricity consumption in each State or Territory. If the combined electricity demand of the Buyers Group does increase, this further increases the likelihood of reaching a scale sufficient to incentivise new investment; and

- iv. **Increased Competition in Downstream Supply of Goods or Services:** Recent increases in the cost of electricity acquired by Participating Members adversely impacts the costs of downstream goods or services offered by Participating Members to their customers and/or erodes the viability of the commercial operations of Participating Members, if such cost increases cannot be passed onto customers.<sup>17</sup> As noted above, to the extent that the Proposed Conduct results in Participating Members acquiring electricity at a lower prices, there is the potential for Participating Members to compete more vigorously in the supply of goods or services to their own customers, for example by passing on the cost reduction in the form of lower prices, or otherwise investing in improving product offerings, expanding their product range or strengthening the ongoing viability of their commercial operations.

## 8.0 Public Detriment

The Participating Members do not believe that the proposed conduct will result in any material public detriment, and if anything the Proposed Conduct is likely to be pro-competitive rather than anti-competitive, for the reasons set out in sections 6.0 and 7.0 above.

To the extent that any theoretical potential for public detriment may exist, the

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<sup>17</sup> As noted above, the ACCC recognised at p336 of its Final Report that *“Increasing electricity costs have reduced the capacity of some businesses to grow or to stay competitive, and... passing on electricity costs to their customers is frequently not possible.”*

practical risk of any such detriment arising in this case is negligible, including having regard to the fact that:

- i. The tender process would be open and transparent and will ensure there will be competition between electricity suppliers to win the contracts;
- ii. The proposed conduct involves relatively small proportions of electricity demand for the NEM, WEM and Northern Territory, and accordingly would not have any material impact on competition in any relevant market relating to electricity supply. As noted above, Participating Members' combined electricity demand in Calendar Year 2018 amount to less than 0.48% of total electricity consumption in the NEM, 0.48% of total consumption in the WEM and 0.33% of total consumption in the Northern Territory (based on on the total consumption of electricity in each market during Financial Year 2017-18); and
- iii. Any information sharing between Participating Members will be limited to the acquisition of electricity the subject of the Proposed Conduct. Given this restriction, and the discipline that Participating Members will continue to face from competition in downstream retail markets in which they participate, the likelihood of public detriment from an increased risk of coordination between the members is negligible.

## 9.0 Relevant Market Participants

As noted above, the classes of persons directly impacted by the Proposed Conduct include electricity suppliers, which will have the opportunity to participate in the tender process described above. The ACCC is very familiar with the electricity industry and the identity of relevant market participants, having recently concluded a detailed electricity pricing inquiry, as well as a number of other similar authorisations as noted in section 2.0 above.

## 10.0 Declaration by Applicant

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned undertakes to advise the ACCC immediately of any material change in circumstances relating to the application.

The undersigned are aware of the provisions of sections 137.1 and 149.1 of the *Criminal Code* (Cth).



.....  
Signature of authorised person

**Chief Executive Officer**

.....  
Office held

**Philippa Kelly**

.....  
Print name of authorised person

**6<sup>th</sup> August 2019**

This ..... day of .....

(day) (month and year)

Note: If the Applicant is a corporation, state the position occupied in the corporation by the person signing. If signed by a solicitor on behalf of the Applicant, this fact must be stated.



## Annexure A – Representative Participating Members of Buyers Group

In conjunction with Annexure A, please refer to Annexure B for a listing of all individual entities represented by each Representative Participating Member, which will be Party to the Buyers Group and enter into the Energy Supply Agreement.

1. **Large Format Retail Association** (ACN 131 555 612)  
Address: Suite 10, 828 High St, Kew East, VIC 3102  
Contact Person: Available on request  
Description of business: The LFRA is the national peak industry association for Australia's Large Format Retail sector, otherwise known as 'Big Box' retail. The LFRA advocates for clarity, consistency and certainty of legislation and regulations affecting the Large Format Retail sector. Members of the LFRA include Large Format Retailers, as well as owners, developers, investors and service suppliers of the sector.
2. **Adairs** (Adairs Retail Group Pty Ltd, ACN 128 287 776)  
Address: 2 International Court, Scoresby, VIC 3179  
Contact Person: Available on request  
Description of business: Manchester, Homewares, Bedding and Co-ordinated Merchandise and associated Furniture
3. **Amart Furniture** (Amart Furniture Pty Ltd, ACN 009 810 324)  
Address: 41 Brickworks Place, Rochedale, QLD 4123  
Contact Person: Available on request  
Description of business: Furniture, outdoor and bedding
4. **Arkadia** (Arkadia Property Services Pty Ltd, ACN 111 115 961)  
Address: Level 1, 202 Military Road, Neutral Bay, NSW 2089  
Contact Person: Available on request  
Description of business: Property services
5. **Aventus** (Aventus Services Pty Ltd, ACN 606 747 657)  
Address: Level 33, Governor Macquarie Tower, 1 Farrer Place, Sydney, NSW 2000  
Contact Person: Available on request  
Description of business: Property owner and manager
6. **AXIMA Logistics** (Axima Pty Ltd, ACN 137 065 288)  
Address: Unit 2, 135-153 Boundary Road, Laverton North, VIC 3026  
Contact Person: Available on request  
Description of business: Freight Forwarder, Customs Broker & 3PL Warehousing
7. **Baby Bunting** (Baby Bunting Pty Ltd, ACN 128 546 154)  
Address: 955 Taylors Road, Dandenong South, VIC 3175  
Contact Person: Available on request  
Description of business: Retail

8. **Bart Group** (The Sleeping Giant Pty Limited, ACN 134 349 894)  
Address: 90-100 Lee Holm Road, St Marys, NSW, 2760  
Contact Person: Available on request
9. **Beacon Lighting** (Brightlight Nominees Proprietary Limited, ACN 005 137 217)  
Address: 5 Bastow Place, Mulgrave, VIC 3710  
Contact Person: Available on request  
Description of business: Retail of Lighting and Fan Products
10. **Bunnings Group Limited** (Bunnings Group Limited, ACN 008 672 179)  
Address: 16-18 Cato Street, Hawthorn East, VIC 3123  
Contact Person: Available on request  
Description of business: Bunnings is the leading retailer of home improvement outdoor living products in Australia and New Zealand and a major supplier to project builders, commercial tradespeople and the housing industry.
11. **BWP Trust** (BWP Management Limited, ACN 082 856 424)  
Address: Level 14, 123 St Georges Terrace, Perth, WA 6000  
Contact Person: Available on request  
Description of business: Real Estate Investment Trust
12. **Chemist Warehouse** (CW Retail Services Pty Limited, ACN 606 509 791)  
Address: 44 Raglan Street, Preston, VIC 3072  
Contact Person: Available on request  
Description of business: Pharmaceutical goods retailer
13. **Costco** (Costco Wholesale Australia Pty Ltd, ACN 104 012 893)  
Address: 17-21 Parramatta Road, Lidcombe, NSW 2141  
Contact Person: Available on request  
Description of business: Membership Warehouse Club
14. **Decathlon** (Decathlon (Australia) Pty Ltd, ACN 608 596 069)  
Address: 634-726 Princes Highway, Tempe, NSW 2044  
Contact Person: Available on request  
Description of business: Sale of sporting goods
15. **DOME Property Group** (Dome Property Group Pty Ltd, ACN 095 012 874)  
Address: PO Box 171, Osborne Park, WA 6917  
Contact Person: Available on request  
Description of business: Developer / Investor
16. **Early Settler** (ESR Group Holdings Pty Ltd, ACN 113 065 973)  
Address: 13 Greenhill Road, Wayville, SA 5034

Contact Person: Available on request

Description of business: The retail sale of furniture, homewares and home improvement products

17. **EXCEL Development Group Pty Ltd** (ACN 128 571 764)  
Address: 51 Alfred Street, Fortitude Valley, Brisbane, QLD 4006  
Contact Person: Available on request  
Description of business: Property Owners
18. **Gazcorp** (Gazcorp Pty Ltd, ACN 001 696 073)  
Address: Level 10, 60 Park Street, Sydney, NSW, 2000  
Contact Person: Available on request  
Description of business: Property Developers
19. **Greencross / Petbarn** (Greencross Limited, ACN 119 778 862)  
Address: Unit 6, 372 Eastern Valley Way, Chatswood, NSW, 2067  
Contact Person: Available on request  
Description of business: Retailers of pet related products, owners and operators of vet clinics
20. **Greenlit Brands** (Greenlit Brands Pty Ltd, ACN 612 890 874)  
Address: Level 4, 1 Epping Road, North Ryde, NSW 2113  
Contact Person: Available on request  
Description of business: Furniture and Homewares Retailer
21. **Grosvenor Engineering Group** (Grosvenor Engineering Group Pty Ltd, ACN 003 608 795)  
Address: 76 Heathcote Road, Moorebank, NSW 2170  
Contact Person: Available on request  
Description of business: Hard Technical Services
22. **Harvey Norman / Domayne / Space / Joyce Mayne** (Harvey Norman Holdings Ltd, ACN 003 237 545)  
Address: A1 Richmond Road, Homebush West, NSW 2140  
Contact Person: Available on request  
Description of business: Franchisor and Property Owner
23. **Home Consortium** (Hydrox Holdings Pty Ltd, ACN 138 990 593)  
Address: 19 Bay Street, Double Bay, NSW 2028  
Contact Person: Available on request  
Description of business: Homemaker Centres
24. **H Troon** (Troon Group Pty Ltd, ACN 624 507 544)  
Address: Suite 1.03, 163 Eastern Road, South Melbourne, VIC 3205

Contact Person: Available on request

Description of business: Property Development & Asset Management

25. **IKEA** (IKEA Pty Limited, ACN 006 270 757)  
Address: 630-726 Princes Highway, Tempe, NSW 2044  
Contact Person: Available on request  
Description of business: Home Furniture Retailer
26. **iRetail** (Rayra Properties Pty Limited, ACN 627 083 756)  
Address: 36-48 Ashford Avenue, Milperra, NSW 2214  
Contact Person: Available on request  
Description of business: Homemaker/Plaza Centre
27. **Jaycar Electronics / Road Tech Marine** (Jaycar Pty Ltd, ACN 000 087 936 & Road Tech Marine Pty Ltd, ACN 159 256 612)  
Address: 320 Victoria Road, Rydalmere, NSW 2116  
Contact Person: Available on request  
Description of business: Electronics Retailer and Wholesaler
28. **JB Hi-Fi / The Good Guys** (JB Hi-Fi Limited, ACN 093 220 136)  
Address: 60 City Road, Southbank, VIC 3006  
Contact Person: Available on request  
Description of business: Electronics Retailer
29. **Kitchen Warehouse** (Kitchen Warehouse Pty Ltd, ACN 093 407 419)  
Address: 36 Sustainable Drive, Bibra Lake, WA 6163  
Contact Person: Available on request  
Description of business: Retail
30. **Leffler Simes Architects** (Leffler Simes Pty Ltd, ACN 001 043 992)  
Address: 7 Young Street, Neutral Bay, NSW 2089  
Contact Person: Available on request  
Description of business: Architectural Practice
31. **Lesso Home** (Lesso Mall Development (Auburn) Pty Ltd, ACN 613 533 592)  
Address: Level 11, 309 Kent Street, Sydney, NSW, 2000  
Contact Person: Available on request  
Description of business: Own and Operate LFR Centre
32. **Lincraft** (Lincraft Australia Pty Ltd, ACN 113 094 358)  
Address: 60 Derrimut Drive, Derrimut, VIC 3030  
Contact Person: Available on request  
Description of business: Retail

33. **Mattress Investments (Sleepy's)** (Sleepy's Pty Ltd, ACN 104 154 627)  
Address: 5/126 Links Ave South, Eagle Farm, QLD 4009  
Contact Person: Available on request  
Description of business: Bedding and Accessories Retailer
  
34. **Newmark Capital Limited** (Newmarket Capital Ltd, ACN 126 526 690)  
Address: Level 18, 644 Chapel Street, South Yarra, VIC 3141  
Contact Person: Available on request  
Description of business: Commercial & Retail Property Development
  
35. **Officeworks** (Officeworks Ltd, ACN 004 763 526)  
Address: 236-262 East Boundary Road, Bentleigh East, VIC 3165  
Contact Person: Available on request  
Description of business: Office Supplies Retailer
  
36. **OZ Design Furniture** (OZ Design Furniture Pty Ltd, ACN 003 392 845)  
Address: Lot 2 Mile End Road, Rouse Hill, NSW 2155  
Contact Person: Available on request  
Description of business: Furniture
  
37. **PETstock** (PETstock Pty Ltd, ACN 098 394 588)  
Address: 102 Lydiard St, Ballarat, VIC 3350  
Contact Person: Available on request  
Description of business: Pet Retail & Pet Services
  
38. **Pillow Talk** (Pillow Talk Pty Ltd, ACN 010 861 711)  
Address: 1 Northolt Street, Darra, QLD 4076  
Contact Person: Available on request  
Description of business: Manchester
  
39. **Provincial Home Living** (Australia China Investment Company Pty Ltd as trustee for the PHL Unit Trust, ACN 077 093 764)  
Address: 10 River Street, South Yarra, VIC 3141  
Contact Person: Available on request  
Description of business: Retail Stores
  
40. **Spotlight** (Spotlight Pty Ltd, ACN 005 180 861)  
Address: Level 6, 111 Cecil Street, South Melbourne, Vic, 3205  
Contact Person: Available on request  
Description of business: Retail
  
41. **Super Retail Group** (Super Retail Group Limited, ACN 108 676 204)  
Address: 751 Gympie Road, Lawnton, QLD 4501

Contact Person: Available on request  
Description of business: Retail

**Annexure B – Full list of Participating Members of Buyers Group represented by Representative Participating Member**

<b>Representative Participating Member</b>	<b>Participating Members represented by Representative Participating Member</b>	<b>ACN</b>
<b>AXIMA Logistics</b>	Axima Pty Ltd	137 065 288
<b>Adairs</b>	Adairs Retail Group Pty Ltd	128 287 776
<b>Amart Furniture</b>	Amart Furniture Pty Ltd	009 810 324
<b>Arkadia</b>	Arkadia Alexandria Pty Ltd	132 478 883
	Arkadia Aspley Pty Ltd	161 739 939
	Arkadia Blacktown Pty Ltd	143 483 667
	Arkadia Fortitude Pty Ltd	628 252 326
	Arkadia Gateway Pty Ltd	111 115 961
	Arkadia Maroochydore Pty Ltd	151 355 565
	Arkadia Nunawading Pty Ltd	163 274 575
	Karnew Properties Pty Ltd	106 849 521
	Noosa Pacific Hotel Pty Ltd	602 740 170
	Ratewave Pty Ltd	111 115 961
	Terrigal Pacific Hotel Pty Ltd	609 479 852
<b>Aventus Group</b>	Aventus Belrose Pty Ltd	165 176 250
	Aventus Caringbah Pty Ltd	145 771 973
	Aventus Cranbourne Pty Ltd	607 765 122
	Aventus Cranbourne Thompsons Road Pty Ltd	155 857 426
	Aventus Custodian Pty Ltd	622 055 298
	Aventus Epping Pty Ltd	609 032 297
	Aventus Kotara South Pty Ltd	160 035 049
	Aventus Mile End Stage 3 Pty Ltd	103 316 267
	Aventus Peninsula Pty Ltd	150 914 579
	Aventus Properties Pty Ltd	612 072 723
	Aventus Sunshine Coast Pty Ltd	607 331 162
Aventus Tuggerah Pty Ltd	607 455 532	
<b>BWP Trust</b>	BWP Management Limited	082 856 424
<b>Baby Bunting</b>	Baby Bunting Pty Ltd	128 546 154
<b>Bart Group</b>	The Sleeping Giant Pty Ltd	134 349 894
<b>Beacon Lighting</b>	Beacon Property Company Pty Ltd	629 069 290
	Brightlite Nominees Pty Ltd	005 137 217
<b>Bunnings Group Limited</b>	Bunnings Group Ltd	008 672 179
<b>Chemist Warehouse</b>	CW Retail Services Pty Ltd	606 509 791
<b>Costco</b>	Costco Wholesale Australia Pty Ltd	104 012 893

<b>DOME Property Group</b>	Dome Holdings Pty Ltd	009 313 875
	Inter Steel Pty Ltd	110 893 340
<b>Decathlon</b>	Decathlon (Australia) Pty Ltd	608 596 069
<b>Early Settler</b>	ESR Group Holdings Pty Ltd	113 065 973
<b>Excel Development Group</b>	Agnes Bridge Pty Ltd	125 120 550
	The Trustee for Re-Grow Commercial Property Trust	964 135 826
	Re-Grow Retail Property Pty Ltd	604 585 499
	Vintrosa Pty Ltd	010 444 229
<b>Gazcorp</b>	Gazcorp Pty Ltd	001 696 073
<b>Greencross</b>	Greencross Limited	119 778 862
<b>Greenlit Brands</b>	Fantastic Holdings Limited	004 000 775
	Greenlit Brands Pty Ltd	612 890 874
	Greenlit Brands Household Goods Pty Limited	105 828 957
	Steinhoff Asia Pacific Limited	051 493 764
	Snooze Management Pty Ltd	006 232 720
<b>Grosvenor Engineering Group</b>	Grosvenor Engineering Group Pty Ltd	003 608 795
<b>H Troon (Troon Group)</b>	Delacombe Properties Pty Ltd	608 655 170
	H Troon Developments Pty Ltd	070 874 510
<b>Harvey Norman</b>	Derni Pty Ltd	002 263 872
	Harvey Norman Discounts No 1 Trust	347 009 955
	Lesandu Berrimah Pty Ltd	161 692 315
	Lesandu Melbourne City Dm Pty Ltd	096 511 572
	Lesandu Pty Limited	002 269 070
	Lesandu Adelaide City Pty Ltd	101 593 051
	Lesandu Bondi Junction Pty Ltd	105 640 944
	Lesandu Broadway Pty Ltd	094 707 196
	Lesandu Kewdale Pty Limited	604 713 135
	Lesandu Marion Pty Limited	092 611 268
	Lesandu Perth City West Pty Ltd	093 833 526
	Lesandu WA Pty Ltd	073 652 347
	Space Furniture Pty Ltd	073 811 462
	Yoogalu Pty Limited	002 269 132
<b>Home Consortium</b>	Hydrox Holdings Pty Ltd	138 990 593
<b>IKEA</b>	IKEA Pty Limited	006 270 757
<b>JB Hi-Fi</b>	JB Hi-Fi Limited	093 220 136
<b>Jaycar Electronics Group</b>	Jaycar Pty Ltd	000 087 347
	Road Tech Marine Pty Ltd	159 256 612
<b>Kitchen Warehouse</b>	Kitchen Warehouse Pty Ltd	093 4074 19
<b>LFRA Office</b>	Large Format Retail Association Ltd	131 555 612



<b>Leffler Simes Architects</b>	The Trustee for Seven Young St Unit Trust	575 169 454
<b>Lesso Home</b>	Lesso Mall Development (Auburn) Pty Ltd	613 533 592
	Lesso Mall Property Services(Australia) Pty Ltd	614 595 881
<b>Lincraft</b>	Lincraft Australia Pty Ltd	113 094 358
<b>Newmark Capital Limited</b>	Energy Intelligence Pty Ltd	132 080 552
	Newmark Capital Ltd	126 526 690
	The Trustee for Chadstone Property Trust	420 853 064
	The Trust Company (Australia) Ltd	000 000 993
	The Trustee for Newmarket Como Property Trust	842 992 869
<b>OZ Design Furniture</b>	Alexfurn Investments Pty Ltd	107 581 377
	The Trustee for The Kapital Investment Trust	266 286 548
	Belfurn Pty Ltd	121 026 266
	Castlefurn Pty Ltd	109 245 909
	Central Coast Furniture Pty Ltd	603 212 844
	Livefurn Pty Ltd	165 637 043
	NRW Investments Pty Ltd	059 410 061
	OZ Auburn Pty Ltd	088 270 179
	OZDFO Pty Ltd	165 457 643
	OZ Design Furniture Campbelltown Pty Ltd	611 816 070
	OZ Design Furniture Caringbah Pty Ltd	148 092 326
	OZ Design Geelong Pty Ltd	007 346 410
	OZ Design Furniture Helensvale Pty Ltd	625 817 012
	OZ Kotara Pty Ltd	143 700 789
	OZ Design Furniture Macgregor Pty Ltd	613 029 360
	OZ Moore Park Pty Ltd	113 499 246
	Mornington Design Pty Ltd	165 637 052
	OZ Design Furniture Narre Warren Pty Ltd	613 225 451
	OZ Design Furniture Penrith Pty Ltd	609 602 271
	OZ Design Furniture Rutherford Pty Ltd	611 987 289
	OZ Design Furniture Skygate Brisbane Pty Ltd	629 088 875
	OZ Design Furniture Toowoomba Pty Ltd	622 553 324
	OZ Design Furniture Tuggerah Pty Ltd	618 148 913
OZ Design Furniture Pty Ltd	003 392 845	
OZ Design Furniture Jindalee Pty Ltd	618 176 597	

	Richfurn Pty Ltd	600 622 937
	Springfurn Pty Ltd	121 115 366
	Warren Citygate Pty Ltd	110 372 006
<b>Officeworks</b>	Wesfarmers Limited	008 984 049
<b>PETstock</b>	Aberdoune Pty Ltd as Trustee for the M & M Forbes Family Trust	924 864 471
	C&F Duggan Holdings Pty Ltd as Trustee for the C&F Duggan Family Trust	691 938 601
	Hart Retail Group t/as PETstock Allenby Gardens	112 460 401
	Hart Retail Group t/as PETstock Burnside	112 460 401
	Hart Retail Group t/as PETstock Melrose Park	112 460 401
	Hart Retail Group t/as PETstock Munno Para	112 460 401
	Hart Retail Group t/as PETstock Noarlunga	112 460 401
	Hart Retail Group t/as PETstock Parafield	112 460 401
	Hart Retail Group t/as PETstock Port Lincoln	112 460 401
	Hart Retail Group t/as PETstock Sefton Park	112 460 401
	Lockevo Pty Ltd	118 062 641
	MG PETstock Pty Ltd	169 609 045
	PETstock (Altona North) Pty Ltd	600 092 171
	PETstock (Ashmore) Pty Ltd	119 636 458
	PETstock Bacchus Marsh Pty Ltd	601 696 995
	PETstock (Ballarat) Pty Ltd	051 338 295
	PETstock (Bendigo) Pty Ltd T/A PETstock Epsom	128 486 742
	PETstock (Bendigo) Pty Ltd	128 486 742
	PETstock (Braeside) Pty Ltd	128 414 095
	PETstock (Caboolture) Pty Ltd	610 198 528
	The Trustee for The Petstock Caboolture Trust	399 648 575
	PETstock (Cairns) Pty Ltd	128 337 075
	PETstock (Cannonvale) Pty Ltd	618 353 709
	PETstock (Castlemaine) Pty Ltd	629 356 467
	PETstock (Colac) Pty Ltd	106 956 834
	PETstock (Craigieburn) Pty Ltd	166 638 482
	PETstock (Cranbourne) Pty Ltd	108 871 058

PETstock (Darwin) Pty Ltd t/as PETstock Berrimah	605 038 293
PETstock (Darwin) Pty Ltd t/as PETstock Darwin	605 038 293
PETstock (Dural) Pty Ltd	126 160 861
PETstock (Erina) Pty Ltd	129 430 208
PETstock (Essendon) Pty Ltd	167 814 093
PETstock (Geelong) Pty Ltd t/as PETstock Geelong City	103 220 524
PETstock (Geelong) Pty Ltd t/as PETstock Torquay	103 220 524
PETstock (Geelong) Pty Ltd t/as PETstock Waurin Ponds	103 220 524
PETstock (Hoppers Crossing) Pty Ltd	105 361 868
PETstock (Horsham) Pty Ltd	101 287 085
PETstock (Indooroopilly) Pty Ltd	127 745 626
PETstock (MP) Pty Ltd	124 069 629
PETstock (Mitcham) Pty Ltd	121 089 521
PETstock (Mornington) Pty Ltd	128 338 072
PETstock (Rosebud) Pty Ltd	167 710 652
PETstock (Rouse Hill) Pty Ltd	603 905 586
PETstock (Sunbury) Pty Ltd	603 307 937
PETstock (Tamworth) Pty Ltd	608 715 608
PETstock (Taylors Lakes) Pty Ltd	144 866 786
PETstock (Townsville) Pty Ltd	151 976 635
PETstock (Tuggerah) Pty Ltd	609 948 503
PETstock (Vermont) Pty Ltd	127 746 490
PETstock (West Gosford) Pty Ltd	604 821 463
PETstock ACT Pty Ltd ATF PETstock ACT Unit Trust t/as PETstock Tuggeranong	162 232 184
PETstock Baldivis Pty Ltd	126 086 708
PETstock Bunbury Pty Ltd as Trustee for PETstock Bunbury Unit Trust	395 078 842
PETstock Gympie Pty Ltd	600 929 306
PETstock Joondalup Pty Ltd	130 831 097
PETstock Mandurah Pty Ltd as Trustee for the L&A Stone Family Trust	091 962 549
PETstock Mini Pty Ltd t/as PETstock Broadway	166 638 811
PETstock Mini Pty Ltd t/as PETstock Clayfield	166 638 811
PETstock North QLD Pty Ltd	603 250 853

PETstock North Sydney Pty Ltd t/as PETstock Artarmon	160 875 052
PETstock North Sydney Pty Ltd t/as PETstock Balgowlah	160 875 052
PETstock North Sydney Pty Ltd t/as PETstock Belrose	160 875 052
PETstock Retail Pty Ltd t/as PETstock Ballina	127 690 466
PETstock Retail Pty Ltd t/as PETstock Box Hill	127 690 466
PETstock Retail Pty Ltd t/as PETstock Carindale	127 690 466
PETstock Retail Pty Ltd t/as PETstock Carrum Downs	127 690 466
PETstock Retail Pty Ltd t/as PETstock Chadstone	127 690 466
PETstock Retail Pty Ltd t/as PETstock Claremont	127 690 466
PETstock Retail Pty Ltd t/as PETstock Coorparoo	127 690 466
PETstock Retail Pty Ltd t/as PETstock Eltham	127 690 466
PETstock Retail Pty Ltd t/as PETstock Engadine	127 690 466
PETstock Retail Pty Ltd t/as PETstock Gregory Hills	127 690 466
PETstock Retail Pty Ltd t/as PETstock Hawthorn	127 690 466
PETstock Retail Pty Ltd t/as PETstock Knox	127 690 466
PETstock Retail Pty Ltd t/as PETstock Lawnton	127 690 466
PETstock Retail Pty Ltd t/as PETstock Marsden Park	127 690 466
PETstock Retail Pty Ltd t/as PETstock Penrith	127 690 466
PETstock Retail Pty Ltd t/as PETstock Pahran	127 690 466
PETstock Retail Pty Ltd t/as PETstock Robina	127 690 466
PETstock Retail Pty Ltd t/as PETstock South Fremantle	127 690 466

	PETstock Retail Pty Ltd t/as PETstock Zetland	127 690 466
	PETstock Retail Pty Ltd t/as PETstock Ulladulla	127 690 466
	PETstock Wagga Wagga Pty Ltd	163 732 821
	The Trustee for PS NSW Group Trust t/as PETstock (Adamstown) Pty Ltd	097 174 629
	The Trustee for PS NSW Group Trust t/as PETstock (Warners Bay) Pty Ltd	097 174 629
	PETstock Toowoomba Pty Ltd	127 794 432
	PETstock (Pakenham) Pty Ltd	157 681 117
	Petsource Pty Ltd	120 944 505
	Petstock (Belmont WA) Pty Ltd	613 017 931
	Petstock (Brighton) Pty Ltd The Trustee for the PETstock Brighton Unit Trust	908 541 860
	Square Box Pty Ltd	141 964 098
	Stephen Michael O'Callaghan & Narelle Jane O'Callaghan as trustee for the O'Callaghan Family Trust	544 047 240
	The Trustee for PETstock Warrnambool Trust	824 468 422
	The Trustee for PS NSW Group Trust t/as PETstock Heatherbrae	097 174 629
	The Trustee for the PETstock Balcatta Trust	597 011 059
	The Trustee for the PETstock Shepparton Unit Trust t/as PETstock Shepparton	546 150 756
	The trustee for A and T Westwood Investments t/as PETstock Echuca	312 974 648
	Trustee for PETstock QLD Group Trust t/as PETstock Maroochydore	202 166 540
<b>Pillow Talk</b>	Pillow Talk Pty Ltd	010 861 711
<b>Provincial Home Living</b>	PHL Unit Trust/Provincial Home Living	973 410 706
<b>Sleepy's</b>	Sleepy's Pty Ltd	104 154 627
<b>Spotlight</b>	The Trustee for Anaconda Unit Trust	955 173 782
	The Trustee for the Box Hill LFRC Unit Trust	459 099 554
	Howitt & Aroona Settlements	258 129 158
	The Trustee for Spotlight North Central Region Property Trust	157 459 569
	The Trustee for Spotlight Southern Region Property Trust	606 806 767

	The Trustee for Spotlight Western Region Property Trust	101 599 701
	The Trustee for SPG Mt Druitt Unit Trust	764 405 428
	The Trustee for Mt Gravatt Spotlight Property 2 Unit Trust	240 432 102
	Fraid (SPG) Trust & Fried (SPG) Trust	781 920 840
	The Trustee for Spotlight Stores Trading Trust	564 861 886
<b>Super Retail Group</b>	M&C Energy Pty Ltd trading as Schneider Electric	104 501 091
<b>iRetail</b>	Rayra Properties Pty Limited	627 083 756



Large Format  
Retail Association

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