

Application for revocation of an authorisation and substitution of a replacement

Lodged by:

Darebin City Council

on behalf of itself and 46 local government councils

29 July 2020

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1 Summary

1.1 Background

This application is made by the Darebin City Council (**Darebin CC**), on behalf of itself and the current Victorian local government councils described in this application (collectively, the **Participating Councils**)(**Applicants**). The current members of the buyers group are set out in Annexure A to this Application.

On behalf of the Participating Councils, Darebin CC seeks interim and final authorisation under section 88(1) of the *Competition and Consumer Act 2010* (Cth) to engage in the proposed conduct described in section 5 of this application (**Proposed Conduct**). The Proposed Conduct involves pooling the individual electricity demand of the Participating Councils and placing a single tender into the market calling for proposals for the supply of retail electricity services and renewable energy certificates (ie, Large Scale Generation Certificates) (**LGCs**) from an electricity retailer. The tender will seek agreements between electricity suppliers for both power and green benefits in the form of LGCs at a minimum of one LGC for every MWh electricity consumed over the term of the agreement.

The Participating Councils consider the Proposed Conduct will provide significant public benefits by promoting investment in renewable energy, increasing the transaction cost savings for the Participating Councils, and encouraging increased competition for the supply of electricity to the Participating Councils.

2 Parties to the Proposed Conduct

2.1 Applicants

Darebin CC makes this application on behalf of itself and 46 other participating councils listed in Annexure 1 (collectively, the **Participating Councils**). Each of the Participating Councils are local government bodies whose functions are outlined in local government Acts.¹

In the performance of its role, each of the Participating Councils must give effect to the 'overarching governance principles', which include:²

- (a) giving priority to achieving the best outcomes for the municipal community, including future generations;
- (b) promoting the economic, social and environmental sustainability of the municipal district, including mitigation and planning for climate change risks;
- (c) engaging in strategic planning and strategic decision making;
- (d) pursuing innovation and continuous improvement;
- (e) seeking to collaborate with other local councils, Governments and statutory bodies; and
- (f) ensuring the ongoing financial viability of the Council.

2.2 Applicant's address for service of documents

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

Carolyn Oddie
Partner
Allens
Deutsche Bank Place, 126 Phillip Street Sydney NSW 2000

¹ These include the *Local Government Act 1989* (Vic) and *Local Government Act 2020* (Vic)

² *Local Government Act 2020* (Vic) s 9.



2.3 Other Persons who propose to engage in the Proposed Conduct

In addition to the current Participating Councils listed in Annexure 1, other persons who may seek to engage in the Proposed Conduct include the successful tenderer(s) who will be the other party to the relevant electricity supply contracts with the Participating Councils. Each Participating Council will enter into a separate agreement with the relevant electricity supplier(s).

3 Authorisation to be revoked (the existing authorisation)

3.1 Registration number and date of authorisation to be revoked

On 31 January 2020, the ACCC granted authorisation AA1000459 to the Municipal Association of Victoria (ABN 24 326 561 315) (**MAV**) on behalf of itself and 48 Victorian Councils, including Darebin CC.

3.2 Parties to the authorisation to be revoked

Four councils that were authorised under the current authorisation have decided that they no longer wish to participate in the buyers group. The parties to the authorisation to be revoked are set out in Figure 1 below:

Figure 1 Parties to authorisation AA1000459 to be revoked

Party to authorisation AA1000459 to be revoked	ABN/ACN
Municipal Association of Victoria	24 326 561 315
Hume City Council	14 854 354 856
Mitchell Shire Council	27 352 592 142
City of Boroondara	83 441 314 965
Murrindindi Shire Council	83 600 647 004

3.3 Basis for seeking revocation

Darebin CC, as one of the Participating Councils and the nominated lead organisation in the current authorisation, seeks to revoke the current authorisation due to changes to the composition of the parties under the authorisation, namely the:

- (a) replacement of MAV with Darebin CC as the applicant and the procurement leading organisation;
- (b) removal of four of the councils from the list of Participating Councils, as set out in Figure 1 above; and
- (c) addition three councils to the list of Participating Councils.

4 Authorisation to be substituted (the new authorisation)

4.1 Contact details

The parties that propose to engage, or become engaged, in the proposed conduct and on whose behalf authorisation is sought are the Participating Councils, are set out in Annexure A to this application.

As discussed above, four of the councils covered under the current authorisation have decided they do not wish to participate in the buyers group. However, a further three additional councils who were

not covered under the authorisation wish to be included as Participating Councils in this application. Details of these additional councils are set out in Figure 2 below:

Figure 2 Additional parties to the authorisation to be substituted

Additional party to the authorisation to be substituted	ABN/ACN
Alpine Shire Council	14 821 390 281
Cardinia Shire Council	32 210 906 807
Borough of Queenscliffe	47 294 157 406

A description of the business activities of the Participating Councils is set out in section 2.1 above.

5 The Proposed Conduct

5.1 Changes to the conduct between the existing authorisation and the new authorisation

Under the existing authorisation, MAV is responsible as the leading procurement organisation to conduct the tender process. However, in making the arrangements in respect of the previous authorisation, it was resolved that the better structure might be for Darebin CC to take on the coordination role. Therefore, under the new authorisation, Darebin CC will replace MAV in this role. In addition, Darebin CC will replace MAV as the applicant for the Authorisation. Accordingly, any references to the conduct of MAV under the current authorisation have been amended to refer to the conduct of Darebin CC. In addition, Darebin CC will not enter into an umbrella agreement with the successful tenderer(s) or at this stage undertake contract management services for the Participating Councils. However, these amendments will not result in any substantive changes to the impact of the Proposed Conduct.

5.2 Overview of the Proposed Conduct

The Participating Councils propose to collectively negotiate with electricity suppliers to secure cost competitive and reliable electricity supply. It is proposed that Darebin CC, on behalf of the Participating Councils will conduct a tender process for the supply of retail electricity supply services and renewable energy certificates (ie, Large Scale Generation Certificates) (**LGCs**) from an electricity retailer. The process will be conducted in accordance with section 186 of the *Local Government Act 1989* (Vic). [REDACTED]

The tender will seek agreements between electricity suppliers for both power and green benefits in the form of LGCs at a minimum of a 1:1 basis. This equates to the supply of one LGC for every MWh electricity consumed over the term of the agreement, including the renewable power percentage (**RPP**). The LGCs purchased under the agreement must be sourced from a nominated Renewable Electricity Facility (or Facilities) that are:

- exporting electricity to the National Electricity Market (**NEM**);
- accredited to register LGCs under the RET Scheme; and
- generating electricity from wind, solar or any other renewable energy source approved by the Participating Councils in writing.

The tender will also include a committed volume arrangement where the Participating Councils commit to:

- (a) specified volumes based on the historical and annual usage volumes provided by each Participating Council or obtained via their current electricity retailers; and

- (b) accepting the outcome of the tender process provided the outcomes fall within particular pricing parameters.

The tenders will be evaluated by Darebin CC in conjunction with the project's energy advisors and the nominated Tender Evaluation Panel comprised of representatives of the Participating Councils. The tenderers will be evaluated with respect to each account category type (ie, large, small, and unmetered accounts). This process will result in a summary report recommending one or more electricity suppliers which is provided to each of the Participating Councils prior to announcing an outcome. The Tender Evaluation Panel will review and either accept or reject the tender recommendation on behalf of the Participating Councils.

Each of the Participating Councils will then enter into an individual contract for the supply of electricity with the successful tenderer(s) on the same or substantially similar terms and conditions. Specifically, Darebin CC, on behalf of itself and each of the Participating Councils seek authorisation to:

- (a) collectively investigate potential electricity supply options for their combined electricity loads and determine price parameters through which Participating Councils commit to purchasing a specified load amount of electricity from the preferred supplier(s);
- (b) collectively conduct a tender process to select an electricity supplier(s) to supply the combined electricity loads of the Participating Councils;
- (c) establish a Tender Evaluation Panel to make recommendations to Darebin CC and the Project Steering Committee based on the tender evaluation criteria;
- (d) consider tenders and negotiate an electricity supply agreement with the preferred electricity supplier(s) that enables the Participating Councils to access the price and other terms and conditions offered by the successful electricity supplier(s); and
- (e) enter into a Standing Deed of Offer with the preferred electricity supplier(s) to supply electricity to each of the Participating Councils.

(the **Proposed Conduct**).

5.3 Tender process

Subject to obtaining interim authorisation, and completing any preliminary investigations in relation to potential electricity supply options for the Participating Councils' combined electricity loads, a joint tender is intended to be conducted as follows:

- (a) the tender will be developed and approved by Darebin CC before being issued to the broad electricity market;
- (b) the tender process will operate as an open tender to all suitably qualified suppliers of electricity;
- (c) Darebin CC will review the responses to the tender and having selected one or more preferred tenderers, will make recommendations to the Project Steering Committee which will include representatives of Darebin CC and some of the Participating Councils following tender evaluation by the Tender Evaluation Panel;
- (d) Darebin CC will negotiate the contractual terms with the preferred tenderer or tenderers;
- (e) once negotiations are completed (with a target deadline of [REDACTED]), Darebin CC will make a recommendation to the Project Steering Committee on the preferred tenderer and contract terms; and
- (f) each of the Participating Councils will then undergo its own governance process to make a final decision as to whether or not to award the tender to the preferred tenderer.

5.4 Ongoing administration of electricity supply agreements

Once the preferred supplier(s) are agreed, it is intended that each of the Participating Councils will be responsible for administering its own electricity supply agreement with the preferred supplier(s) without ongoing consultation with other Participating Councils. It may be necessary for Darebin CC, in consultation with the Participating Councils to participate in various activities and decisions regarding the operation and administration of the electricity agreements, including performance and/or pricing reviews, the exercise of contract options, or any changes to terms and conditions.

5.5 Application for interim authorisation

Darebin CC, on behalf of the Participating Councils seeks interim authorisation in respect of this authorisation to enable the request for tender to the market by late August / early September 2020 to conduct the tender process, and negotiate the terms and conditions of their electricity supply agreements. Darebin CC will not award the tender unless and until final authorisation is granted.

Darebin CC submits that interim authorisation is justified because:

- (a) carrying out the tender process is unlikely to have any impact on any relevant market, as it will not result in any change in the purchasing behaviour of, or the entry into any final contracts by, the Participating Councils;
- (b) due to the Victorian local government elections on 24 October 2020, there will be a caretaker period from 22 September to 24 October 2020, in which the Participating Councils will not be able to announce or commence significant activities like the tender process that may be seen to affect the election period; and
- (c) any further delay to commencing the tender process will affect the ongoing electricity supply of some of the Participating Councils whose contracts will be due to expire. Further, any delays may also impact on individual councils' ability to achieve any renewable energy policies and targets they may be required to achieve.

5.6 Rationale

Through the Proposed Conduct, the Participating Councils seek to establish an electricity supply to service their respective needs. The requirement that the preferred electricity supplier(s) source the electricity supply and acquire LGCs on a 1:1 basis reflects the Participating Council's commitment to promoting the investment of renewable energy sources, and supporting the achievement of renewable energy targets of some of the Participating Councils.

Further, with a combined annual demand of up to approximately 238GWh, the Participating Councils are being significantly affected by the high electricity prices in Victoria.³ Accordingly, if the Proposed Conduct is not authorised, the Participating Councils are likely to face higher transaction costs and higher electricity costs. The Participating Councils consider this aggregation is likely to enable them to secure better prices and commercial terms for electricity, delivering financial savings and long-term certainty, which is essential to the efficient spending in pursuit of their primary objective to achieve the best outcomes for their respective local communities. The Participating Councils will use the electricity for a variety of different purposes to support the daily functioning and services provided by each of the councils in their local communities.

5.7 Provisions of the CCA which might apply to the Proposed Conduct

The Participating Councils may be considered competitors in the acquisition of electricity under the *Competition and Consumer Act 2010* (Cth) (**CCA**). It is possible, although the Participating Councils

³ See Australian Energy Regulator, *State of the Energy Market 2018*, https://www.aer.gov.au/system/files/State%20of%20the%20Energy%20Market%202018%20-%20Full%20report%20A4_2.pdf, p.10

do not concede, that making and giving effect to the Proposed Conduct could be challenged on the basis that they contain provisions that, in the absence of immunity may contravene the CCA, including provisions:

- (a) having the purpose or effect of fixing, controlling or maintaining the price for goods or services acquired or likely to be acquired by the parties (ie, a cartel provision prohibited under sections 45AD(2), 45AF, 45AG, 45AJ, and 45AK of the CCA);
- (b) having the purpose of preventing, restricting or limiting the acquisition or likely acquisition of goods or services by the parties including an agreement not to acquire goods or services from a supplier unless the supplier accepts the terms and conditions offered by the parties and commitments on volume of electricity to be acquired (ie, cartel provisions prohibited under section 45AD(3), 45AF, 45AG, 45AJ, and 45AK of the CCA); or
- (c) having the purpose, or likely to have the effect of substantially lessening competition (s 45(1)(a)-(b) of the CCA).

As local government bodies, each of the Participating Councils may be able to benefit from the immunity provision in section 2BA of the CCA which limits the application of the CCA to the extent that the local government body carries on business. Although the Councils may be able to benefit from this immunity in relation to the Proposed Conduct, the Participating Councils wish to have certainty afforded by authorisation that the Proposed Conduct does not breach these prohibitions and cannot be challenged on the ground that they have the purpose, effect or likely effect of substantially lessening competition, prohibited under section 45(2)(a)(ii) of the CCA.

5.8 Term of authorisation sought

Like the existing authorisation, the Participating Councils seek authorisation for a period of eleven years which is sufficient time for the tender process to be undertaken and to cover the length of the proposed agreements.

6 Persons who may be directly impacted by the Proposed Conduct

Other than current Participating Council other persons who may be directly impacted by the Proposed Conduct include electricity suppliers, which will have the opportunity to participate in the tender process, described in further detail in section 5.3 above.

7 Market information and concentration

7.1 Electricity Markets

Consistent with the ACCC's determination in respect of the current authorisation, and in light of the ACCC's previous consideration of similar conduct (see section 9 below), the Participating Councils consider the following markets are relevant to the assessment of the Proposed Conduct's effect on competition:

- (a) the market for the generation and wholesale supply of electricity in the National Electricity Market (**NEM**) or, in the alternative, in one or more regions of the NEM, including Victoria; and
- (b) the market for the retail supply of electricity in Victoria.

Wholesale electricity in eastern and southern Australia is traded through the NEM, covering the Australian Capital Territory, New South Wales, South Australia, Queensland, Victoria and Tasmania. Generators in the NEM sell electricity through a wholesale spot market in which changes in the supply-demand balance determine prices.

The main customers are energy retailers who buy electricity from the wholesale market, package it with transmission and distribution network services, and sell it to energy customers. The total consumption of electricity in the NEM in 2018-19 was 195.7TWh, of which Victoria consumed 44.7TWh.⁴ While Victoria is a net exporter of electricity, exports are partially offset by hydro generation imports from Tasmania.

The Participating Members' combined electricity demands equate to less than 0.13% of the total consumption in the NEM, and 0.6% of the total consumption in the Victorian market.

8 Counterfactual

If the Participating Councils are unable to proceed with the Proposed Conduct, each individual council will need to independently pursue a source of supply of electricity.

This is likely to significantly diminish the ability of the Participating Councils to realise the cost savings and efficiencies sought by the Proposed Conduct.

Specifically, if the ACCC does not grant the Participating Councils authorisation to engage in the Proposed Conduct, they will be required to pay higher transaction costs and higher electricity input costs, which would reduce the expenditure that each of the Participating Councils have available to spend on other projects servicing their respective local communities.

9 Public benefit

The term 'public benefit' is not defined in the CCA. However, the Tribunal has stated that the term should be given its widest possible meaning. In particular, it includes:

...anything of value to the community generally, any contribution to the aims pursued by society including as one of its principal elements ... the achievement of the economic goals of efficiency and progress.⁵

Under the substituted authorisation, the Participating Councils will be able to participate in the public benefits that would have been provided under the current authorisation, which include::

- (a) transaction cost savings that will benefit the Participating Councils;
- (b) potential for increased competition for the supply of electricity to the Participating Councils;
- (c) increased environmental benefits; and
- (d) greater economies of scale and efficiency.

In addition to the current authorisation, the ACCC has previously considered a number of applications for authorisation of a similar nature and determined that each of the authorisations resulted in several public benefits:

- In June 2018, the ACCC granted authorisation to The South Australian Chamber of Mines and Energy on behalf of itself and 27 other participating group members to form a joint electricity purchasing group in South Australia, for a period of 11 years.⁶ The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, increased competition for the generation and wholesale supply of electricity in South Australia, and greater economies of scale and efficiency through a single supply arrangement rather than individual supply arrangements for each of the applicants.

⁴ Australian Energy Regulator, Annual electricity consumption – NEM, <https://www.aer.gov.au/wholesale-markets/wholesalestatistics/annual-electricity-consumption-nem> (Accessed 3 July 2020).

⁵ *Queensland Co-operative Milling Association Ltd* (1976) ATPR 40-012 at 17,242; cited with approval in *Re 7-Eleven Stores* (1994) ATPR 41-357 at 42,677.

⁶ The South Australian Chamber of Mines and Energy Inc & Ors - Authorisations A91567 & A91568.

- In August 2017, the ACCC granted authorisation to the Eastern Energy Buyers Group (**EEBG**) (comprising industrial energy users who operate in the agriculture industry) to establish a joint energy purchasing group for a period of 11 years.⁷ The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, potential for increased competition for the supply of electricity and gas, and incentives for investment in generating capacity.
- In July 2016, the ACCC granted authorisation to Melbourne City Council along with 13 other entities (comprising three other local councils, two tertiary education institutions and two banks) to jointly negotiate the terms and conditions of certain electricity sale agreements and to conduct a collective tender process for a period of 15 years.⁸ The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, greater economies of scale and efficiency, the potential for increased competition for the retail supply of renewable electricity, and environmental benefits from any resulting additional reduction in greenhouse gas emissions.

9.1 Transaction cost savings

Each Participating Council individually tendering and contracting for their electricity supply will incur transaction costs, such as the time taken to negotiate and other costs such as obtaining technical and legal advice. Potential suppliers will also incur transaction costs in negotiating with the members individually. Accordingly, the Proposed Conduct will save the time and expenditure that would be incurred by each Participating Council if required to conduct separate tender processes.

9.2 Potential for increased competition for the supply of electricity to the Participating Councils

At present, customers of the size of an individual council do not have any meaningful bargaining power in the Victoria market.

The combined load offered by the Participating Councils, and the proposed length of the electricity supply agreements, is likely to attract a range of electricity retailers, and is a more attractive prospect than supplying electricity to any individual Council. It may also encourage other electricity suppliers who would not have otherwise supplied the Participating Councils to compete for the tender.

9.3 Increased environmental benefits

Each of the Participating Councils is committed to promoting the investment in renewable energy through the acquisition of LGCs in order to reduce the impact of greenhouse gas emissions on the environment.

In the first three months of 2019, Australia's emissions reached the highest on record, driven by an increase in emissions from the electricity sector.⁹ According to Ndevr Environmental, an emissions-tracking organisation that publishes quarterly greenhouse gas emissions data, emissions from electricity generation have increased 8.2% during the previous quarter (ie, FY2019 Q2 (ie, October, November and December 2018)) from 42.9 Mt CO₂-e to 46.4 Mt CO₂-e. With respect to large scale electricity generation, Victoria generated 10.1 TWh in Q1 2019 with 11.0% coming from renewable sources such as wind and hydro power, down from 11.8% renewable generation in the previous quarter.

'Renewable energy' is energy that can be obtained from natural resources and can be replenished using renewable energy technologies such as bioenergy, hydropower, and geothermal, ocean, solar

⁷ The Eastern Energy Buyers Group – Authorisations A91594 & A91595.

⁸ Melbourne City Council & Ors – Authorisations A91532 & A91533.

⁹ Ndevr environmental, *Tracking 2 Degrees FY2019 Q3 – Quarterly Report, Q3/FY2019*. Available at: <https://ndevironmental.com.au/tracking-2-degrees-fy2019-q3/>.

and wind energies. Using renewable energy is sustainable, and can be produced with little to no carbon emissions.

The importance of increasing the production and use of renewable energy, over traditional sources, is reflected in Australia's Renewable Energy Target (**RET**). As of June 2015, the RET aims to ensure that at least 33,000 GWh of Australia's electricity comes from renewable sources by the year 2020.

LGCs are created annually based on the actual amount of electricity generated by a renewable energy generation system registered with the Clean Energy Regulator under the *Renewable Energy (Electricity) Act 2000*. LGCs are traded in an open market, and are generally bought and surrendered by RET-liable entities to fulfil their statutory surrender obligations. The number of LGCs a retailer is required to surrender each year is determined by multiplying the amount of electricity it acquires annually by the renewable power percentage (**RPP**). In 2019, the RPP was 18.60%.¹⁰ To participate, electricity generators must generate electricity from eligible natural resources (eg, sun, wind, and agricultural waste). One LGC is equal to one MWh of renewable energy. Ownership of a LGC signifies a megawatt hour (MWh) of renewable energy that has been supplied to the grid.

The public benefit in reducing greenhouse emissions is clear, as all members of the public have an interest in preserving the quality of air, water and living standards for current and future generations. Further, Australia's commitment under the Paris Agreement to contribute to achieving no more than 2 degrees of global warming is estimated to require Australia to reduce greenhouse gas emissions by between 26-28% by 2030.¹¹

By purchasing LGCs, the Participating Councils seek to promote investment in renewable energy projects.

9.4 Greater 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 increases. For example, the ACCC recognised that the volume of electricity sought to be collectively acquired by the EEBG (totalling 0.38% of Victorian electricity consumption) may incentivise investment in new generation systems. This might include a small-scale power purchase agreement, where EEBG would commit to acquire the generator's capacity up front.

While the Participating Council's combined demand is small in market terms (see section 7.1 above and Figure 3 below), it is of a sufficient size to promote new investment.

10 Public detriment

Consistent with the ACCC's determination in respect of the current authorisation, the Participating Councils consider that the Proposed Conduct will not have any material public detriment, and, is to likely to promote rather than lessen competition in any relevant market.

Further, as four councils will be removed from the existing authorisation and only three will be added, the annual consumption of electricity of the Participating Councils is expected to decrease from 0.25TWh to 0.238TWh.

Therefore, the annual consumption of electricity of the Participating Councils will equate to less than 0.13% of the total consumption in the National Electricity Market (NEM), and 0.6% of the total consumption in the Victorian market.

¹⁰ <http://www.cleanenergyregulator.gov.au/RET/Scheme-participants-and-industry/the-renewable-power-percentage>

¹¹ Australian Government – Department of the Environment and Energy, *Paris Agreement*, <https://www.environment.gov.au/climate-change/government/international/paris-agreement>

Figure 3 Annual consumption of electricity – FY2018-19

Participating Councils	Victoria	NEM
0.238TWh	44.7TWh	195.7TWh

Whether the relevant market is the NEM (or in one or more regions of the NEM, including Victoria) or the Victorian electricity market, the amount of electricity the Participating Councils wish to purchase is comparatively small that it cannot have any material impact on competition in any wholesale retail market.

Further, the tender process is open and transparent and will ensure that there will be competition between retail electricity suppliers to win the contracts.

11 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 in section 5.3 above.

12 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 undertake(s) to advise the ACCC immediately of any material change in circumstances relating to the application.

The undersigned are aware that giving false or misleading information is a serious offence and are aware of the provisions of sections 137.1 and 149.1 of the *Criminal Code* (Cth).

Signature of authorised person

Partner, Allens (Solicitor on behalf of the Applicant)

Carolyn Oddie

This 29th day of July 2020

Annexure A – Participating Councils

	Participating Councils	ACN
1.	Alpine Shire Council	14 821 390 281
2.	Ararat Rural City Council	92 492 188 087
3.	Ballarat City Council	37 601 599 422
4.	Banyule City Council	16 456 814 549
5.	Bass Coast Shire Council	81 071 510 240
6.	Borough of Queenscliffe	47 294 157 406
7.	Brimbank City Council	35 915 117 478
8.	Buloke Shire Council	89 293 793 980
9.	Campaspe Shire Council	23 604 881 620
10.	Cardinia Shire Council	32 210 906 807
11.	Central Goldfields Shire Council	82 120 379 784
12.	City of Greater Bendigo	74 149 638 164
13.	City of Greater Dandenong	41 205 538 060
14.	City of Greater Geelong	18 374 210 672
15.	City of Whittlesea	72 431 091 058
16.	Darebin City Council	75 815 980 522
17.	East Gippsland Shire Council	81 957 967 765
18.	Glen Eira City Council	65 952 882 314
19.	Golden Plains Shire Council	86 998 570 296
20.	Greater Shepparton City Council	59 835 329 843
21.	Hepburn Shire Council	76 845 763 535
22.	Hobsons Bay City Council	24 936 107 898
23.	Horsham Rural City Council	37 019 724 765
24.	Indigo Shire Council	76 887 704 310
25.	Loddon Shire Council	90 925 450 534
26.	Macedon Ranges Shire Council	42 686 389 537
27.	Manningham City Council	61 498 471 081
28.	Maribyrong City Council	86 517 839 961
29.	Maroondah City Council	98 606 522 719
30.	Melton City Council	22 862 073 889
31.	Mildura Rural City Council	42 498 937 037
32.	Moira Shire Council	20 538 141 700
33.	Monash City Council	23 118 071 457

	Participating Councils	ACN
34.	Moonee Valley City Council	54 651 216 324
35.	Mount Alexander Shire Council	12 966 477 062
36.	Pyrenees Shire Council	94 924 356 468
37.	South Gippsland Shire Council	67 816 770 786
38.	Starthbogge Shire Council	50 882 781 013
39.	Stonnington City Council	67 688 032 530
40.	Surf Coast Shire Council	18 078 461 409
41.	Swan Hill Rural City Council	97 435 620 016
42.	Warrnambool City Council	44 594 264 321
43.	Wellington Shire Council	18 420 243 468
44.	Whitehorse City Council	39 549 568 822
45.	Wodonga City Council	63 277 160 265
46.	Wyndham City Council	38 393 903 860
47.	Yarra Ranges Shire Council	21 973 226 012