

Thursday, 19 July 2018

Mr Justin Martyn Director Utilities Commission of the Northern Territory Level 11, Charles Darwin Centre 19 The Mall Darwin NT 0800

Dear Justin,

# Subject: Application for a Licence to Carry on Operations in the Northern Territory Electricity Supply Industry

Pursuant to the *Electricity Reform Act*, *Electricity Reform (Administration) Regulations*, *Utilities Commission Act*, *Electricity Networks (Third Party Access) Act* and *Electricity Networks (Third Party Access) Code*, Trutinor NT Pty Ltd ("Trutinor NT") hereby applies to the Utilities Commission of the Northern Territory to be granted an electricity generation licence for the purpose of carrying on operations in the Northern Territory.

Trutinor NT requests the licence to be issued with an effective issue date of 1<sup>st</sup> September 2018 and is applying for the licence to be issued with no specific term.

Trutinor NT notes the views of the Utilities Commission of the Northern Territory (the "Commission") with regard to adopting a non-prescriptive form for licence applications. We can confirm that the detailed information contained in the **attached** *Application for a Licence to Carry on Operations in the Northern Territory Electricity Supply Industry* is provided based upon the specific information requirements set out in the current version of the Utilities Commission's Licencing Manual, including the following major subject areas (amongst others):

- Legal Identity;
- Contact Details;
- Licence Type;
- Licensee Details;
- Nature of Industry Participation;
- Technical Capacity; and
- Financial Viability.

As discussed, we also note that we have reviewed the information contained in the current version of the Licence Fees Schedule and request that an invoice for the application fee be sent to Trutinor NT Pty Ltd.



Trutinor NT is pleased to submit this licence application and we look forward to the opportunity of further meetings with the Commission to discuss this application in greater detail at an appropriate time if required. Should the Commission have any questions or require any further information in order to positively assess Trutinor NT's suitability to be granted the licence for which it has applied and to determine the specifications of the licence conditions to apply, please notify us accordingly.

Michael Allen

Managing Director Trutinor NT Pty Ltd



# Application for a Licence to Carry on Operations in the Northern Territory Electricity Supply Industry

Information Area	Application Requirements per the Licencing Manual	Responses from Trutinor NT		
Legal Identity	<ul><li>Applications should provide:</li><li>the full legal name of the applicant</li></ul>	Trutinor NT provides the following details regarding its legal identity:		
	<ul><li>the ACN</li><li>the registration jurisdiction</li></ul>	Company name     Trutinor NT Pty Ltd		
		• ACN 625 359 186		
		State of Incorporation     The Certificate of Registration attached at Appendix B confirms that the company is registered in the State of Queensland.		
Contact Details	<ul> <li>Applications should provide:</li> <li>the name and title of a nominated contact officer</li> </ul>	Trutinor NT provides the following details regarding its nominated contact officer:		
	<ul> <li>their telephone, facsimile and/or e-mail details</li> <li>a postal address</li> <li>a street address</li> </ul>	Contact     Michael Allen     Managing Director     Trutinor NT Pty Ltd		
		• <b>Telephone</b> (08) 8943 0650		
		Physical Address     Level 1, 48-50 Smith Street, Darwin, NT, 0800		
		Postal Address     GPO Box 1782, Darwin, NT, 0801		
Licence Type	The applicant must state:  the type of licence they are seeking	Trutinor NT provides the following details regarding its proposed licence type:		
	the proposed date (if any) which the applicant seeks to have the licence issued by details of the facilities and	Licence Type     Trutinor NT is applying for an electricity generation licence.		
	the area concerned (as applicable) in which the licence activities are to be carried on	Proposed Issue Date     Trutinor NT requests the licence be issued with an effective date of 1st September 2018.		
	the term (in years) for which they wish the licence to be granted	Geographic Area     Trutinor NT is applying for the electricity generation licence for the 12MW Hudson Creek Power Station generation facility located in Wishart, NT and connected to the electricity network of Darwin-Katherine.		
		Details of Facilities     Trutinor NT is applying for the electricity generation licence in order to:     1) Construct, own and operate a 12MW gas-fired power generation facility on the Darwin-Katherine electricity network, in order to produce electricity.		



The above listed activity is for the purpose of making available to sell the electricity to other electricity entities holding a retail licence or a generation licence.

The Hudson Creek Power Station facility is ordinarily used to carry on operations as an electricity generating business, including capital infrastructure and associated systems for operational management, safety management, electricity generation and electricity dispatch.

A project description is **attached** herewith at **Appendix Q.** 

#### Term

Trutinor NT is applying for the generation licence to be issued for an indefinite term.

## Licensee Details

The applicant must show that:

- they are a resident in Australia and have the capacity to be sued in their own name in an Australian Court
- they are not under external administration
- they have a financial situation commensurate with their potential financial exposure

The applicant should include a copy of the applicant's Certificate of Registration of the company.

If the applicant is a wholly owned subsidiary of another company, or one of a group of related companies, summary information about the parent company and the ownership structure of the related companies should be provided.

The directors, senior management and major shareholders of an applicant should be made known to the Commission.

Trutinor NT provides the following details regarding its status as a proposed licensee:

- Residency Status Certificate of Registration
   A current copy of the ASIC company extract is
   attached herewith at Appendix A and shows that
   Trutinor NT and its directors are resident in
   Australia. Additionally, a copy of the Certificate of
   Registration of Trutinor NT Pty Ltd is attached
   herewith at Appendix B and confirms Trutinor NT
   is an Australian company.
- Administration or Bankruptcy Status
   The ASIC company extract attached herewith at Appendix A shows that Trutinor NT Pty Ltd is not under administration.

#### Financial Situation Status

Trutinor NT Pty Ltd enjoys a financial situation that is commensurate with its potential financial exposure and its directors reasonably believe that the company will be able to meet its obligations in the market as and when they become due. Further details are provided below at the information area titled **Financial Viability** and as **attached** herewith at **Appendix J**.

#### Corporate Structure Shareholding

Trutinor NT Pty Ltd is a member of a wholly owned group of related entities, with Trutinor NT Pty Ltd being a wholly owned subsidiary of Venture Downs Pty Ltd trading as Rimfire Group. An annotated corporate structure diagram is **attached** herewith at **Appendix C**, including ownership, history and business descriptions.

#### • Directors Executive Management

Trutinor NT Pty Ltd has appointed Michael Joseph Allen as Managing Director, and Kim Adam Howlett as executive manager of the company. Further details regarding the directors and executive manager are provided **below** at the information area titled **Technical Capacity**.



#### Other Matters

- The directors confirm that there has been no enforcement actions or enforceable undertakings taken against the directors over the past 10 years.
- The directors confirm that there have been no previously revoked licences held by the directors in any industry, nor any failed licence applications in any industry.
- The directors confirm that there have been no past or present administrative or legal actions in relation to an authorisation or licence in any industry.
- The directors confirm that they have no unspent criminal convictions.

#### Nature of Industry Participation

The applicant should:

- provide general information about its existing activities, both within and outside the electricity industry;
- summarise the reasons why the applicant intends to participate in the Northern Territory electricity industry and the broad nature of that participation;
- explain how the granting of a licence would be consistent with those requirements.
- The objectives of the Utilities Commission Act ("UCA"), as set out in section 6(2), are stated to be:
  - (a) to promote competitive and fair market conduct;
  - (b) to prevent misuse of monopoly or market power;
  - (c) to facilitate entry into relevant markets;
  - (d) to promote economic efficiency;
  - (e) to ensure consumers benefit from competition and efficiency;
  - (f) to protect the interests of consumers with respect to reliability and quality of services and supply in regulated industries;
  - (g) to facilitate maintenance of the financial viability of regulated industries; and
  - (h) to ensure an approp. rate of return on government assets.

Trutinor NT provides the following details regarding the nature of its industry participation:

#### Existing Activities

Trutinor NT is a newly established business and has limited existing operational activities within the electricity generation industry. The business is, however, part of the Rimfire Group which includes other closely related entities such as Rimfire Energy who currently operates an electricity retail business in the Northern Territory, and Rimfire Projects who currently operates a solar generation system design and construct business also in the Northern Territory.

#### Proposed NT Participation

Trutinor NT intends to participate in the Northern Territory electricity industry and operate under an electricity generation licence where it will self-generate electricity in order to sell the electricity to other electricity entities holding a retail licence or a generation licence.

The reason for Trutinor NT's interest in participation in the Territory, as described above, is to provide competition in the NT electricity supply industry.

#### Alignment with Legislative Objectives

#### Facilitate Market Entry

The granting of a licence to Trutinor NT to carry on operations in the NT electricity supply industry will permit a new entrant electricity generator to enter the market and allow it to begin competing in contestable electricity generation.

This is consistent with the objectives stated in s.6(2)(c) of the UCA to facilitate entry into the NT electricity supply industry.

#### Promote Competition Efficiency

As a competing generator selling electricity to retailers or other generators, Trutinor NT will need to demonstrate competitive pricing relative to other sources of generated electricity.



- The objectives of the Electricity Reform Act ("ERA"), as set out in section 3, are stated to be:
  - (a) to promote efficiency and competition in the electricity supply industry;
  - (b) to promote the safe and efficient generation, transmission, distribution and selling of electricity;
  - (c) to establish and enforce proper standards of safety, reliability and quality in the electricity supply industry;
  - (d) to establish and enforce proper safety and technical standards for electrical installations;
  - (e) to facilitate the maintenance of a financially viable electricity supply industry; and
  - (f) to protect the interests of consumers of electricity.

This represents a significant improvement in the status quo regarding generation competition and efficiency within the NT electricity supply industry, and therefore helps to maximise the potential benefits to end-use consumers arising from the deregulated electricity markets in the Territory.

As such, the granting of a licence to Trutinor NT is consistent with the objectives stated in s.6(2)(a), (d) and (e) of the UCA, and s.3(a) of the ERA, to promote competition, efficiency and fair market conduct in the NT electricity supply industry.

#### Monopoly Powers Consumer Interests

Given that the government owned generator, Territory Generation, is the current dominant generator in the NT electricity supply industry, there is currently little opportunity for natural competitive forces to drive efficient economic outcomes and put natural constraints around monopolistic market powers. While the Commission has instituted a range of regulated mechanisms, including wholesale and retail price monitoring and oversight, active competition by way of a competing generator would substantially improve the ability for natural constraints to develop.

As such, the granting of a licence to Trutinor NT is consistent with the objectives stated in s.6(2)(b) of the UCA, and s.3(f) of the ERA, to prevent misuse of monopoly and market power in the NT electricity supply industry and protect the interest of consumers of electricity.

#### Reliability Quality of Supply

As Trutinor NT may in the first instance be contracting with IPPs for them to generate and distribute electricity under PPAs, such generation and distribution would be carried out in accordance with the relevant current requirements for those generation installations (including various safety and technical codes). The establishment of any new generation facilities will also be carried out in accordance with the relevant Australian Standards and requirements for such generation installations.

As such, the granting of a licence to Trutinor NT is consistent with the objectives stated in s.6(2)(f) of the UCA, and s.3(b) and (c) of the ERA, to ensure the reliability and quality of electricity supply in the NT electricity supply industry.

Financial Viability of the Electricity Supply Industry Trutinor NT has provided information below in the section on **Financial Viability** and as **attached** herewith at **Appendix J** regarding the financial viability of the business. As a financially viable business, Trutinor NT is in a strong position to sustain itself during establishment and commence its operations.



As such, the granting of a licence to Trutinor NT is consistent with the objectives stated in s.6(2)(g) of the UCA, and s.3(e) of the ERA, to ensure the financial viability of electricity supply in the NT electricity supply industry.

#### Protect the Interest of Consumers

Overall, electricity consumers will stand to benefit from a new competing generator operating in the NT electricity supply industry. With another generator participant competing on product and price, the interests of electricity consumers and the electricity industry as a whole will be protected.

As such, the granting of a licence to Trutinor NT is consistent with the objectives stated in s.3(f) and of the ERA, to protect the interests of consumers of electricity in the NT electricity supply industry.

Trutinor NT provides the following details regarding its technical capacity:

## Technical Capacity

Applicants must show that they have the technical capacity to comply with the likely conditions of the licence and any associated codes and guidelines published at the time.

In order to demonstrate technical capacity to the Commission, applicants should provide:

- details of their experience in and knowledge of the electricity industry;
- a summary of the skills and experience of the directors and senior managers, and their relevance to meeting the requirements of the licence;
- evidence that the applicant has the capacity to comply with the licence conditions, codes and guidelines relevant to its application;
- if the applicant is to rely on another entity to provide staff and resources, a summary of the relationship between the applicant and this entity, including any formal agreements provide services, and a summary of this other entity's experience in and knowledge of the electricity industry, and technical meet capacity to the relevant requirements of the licence.

#### Management Skills Experience

Michael Allen - Managing Director

Michael brings more than 25 years of experience to Trutinor NT, including founding and developing the Rimfire Group into the largest non-government electricity retailer operating in the NT and delivering significant savings to electricity consumers in the NT. Michael is also a former Executive General Manager Finance CFO for ERM Power during its period of rapid growth when it was the fastest growing electricity retailer and the number one developer of new generation capacity in Australia. In addition to his C level role in a integrated vertically electricity retailer/generator/developer, Michael was directly responsible for raising more than \$1 billion in senior mezzanine project, corporate and equity finance. He established the internal finance function at ERM Power, including leading the financing for the developers to fund its new generation development projects and as otherwise required to facilitate corporate expansion, including finance to grow its newly established electricity retail subsidiary into one of Australia's largest commercial and industrial electricity retailers.

Prior to this, Michael held a variety of senior positions representing energy companies, developers and banks across energy, resources and industry. This includes 8 years based in the Asia region covering projects in 11 countries in Asia, Oceania, Europe the Americas, including power projects in Australia, China, Thailand, and Indonesia.

A copy of Michael's resume is **attached** herewith at **Appendix D**.



Kim Howlett – General Manager - Development Kim brings more than 20 years of experience to Trutinor NT, including as the former Regional Manager Northern Region (QLD, NT, PNG, SI) for Energy Power Systems Australia which is the Caterpillar Power Systems dealer for Australia, Papua New Guinea and the Solomon Islands. EPSA sells and rents Caterpillar engines and also designs, engineers and commissions a range of turnkev power generation systems applications. As Regional Manager, Kim had responsibility for management of multi-disciplinary teams providing sales, engineering and project management operations across energy markets in the Northern region. Key projects that Kim has had responsibility for include the design and commissioning of a 10MWe diesel fired power generation facility in the Northern Territory in 2013 on a brown field mine site; and the design, installation and commissioning of a 6.5MWe greenfield power generation facility in Papua New Guinea in 2014. Scope included negotiating the connection with the network, government and council approvals, overseeing design and construction of the power station from the fuel meter to the network connection.

Prior to this, Kim held a variety of senior positions within the extended Caterpillar enterprise with responsibilities ranging from project development, product management, sales and marketing, renewable energy, logistics and operations across energy, resources and heavy industry.

A copy of Kim's resume is **attached** herewith at **Appendix E**.

<u>Chris Thomson – General Manager - Renewables</u> Chris brings more than 26 years of power generation experience, most recently as Operations Director of Infinity Power where he managed a workforce of more than 90 staff and was responsible for renewable energy system procurement, installation commissioning of a combined total of 35MW of installed solar systems across Australia. Prior to this Chris was Regional Energy Manager of BOC Gases Australia, and had responsibility for management of a power purchasing portfolio in excess of AU\$40M per annum, management of all Power Purchase Agreements an Power supply negotiations with v across Australia. Also within this ro Technical Operations Support res engineering electrical. requirements related to power sup sites within Australia (more than 90

From 2003-2007, Chris was GM–Op Gases for the 45MW Combined Cycl Plant operated by PT Gresik Power



From 1997-2003, Chris held a number of senior site operations and maintenance positions with GE Contractual Services at Port Hedland Boodarie Power Stations, nominally 175MW generation capacity Open Cycle power station and 66kV switchyards.

A copy of Chris's resume is **attached** herewith at **Appendix F**.

Alex Choy – Finance Operations Manager brings more than 35 vears specific electricity industry experience to the Trutinor NT business across a broad mix of technical, financial, operational and analytical functions, including operational processes, settlements, treasury, accounting and reporting. Prior to joining Rimfire Energy in mid 2014, Alex commenced in the industry with Energex, where he was involved in a wide variety of functions across both the electricity network and electricity retail businesses where he played an integral role in developing and establishing systems and processes during the initial phases of deregulation of the electricity industry. Alex subsequently assumed the position of Settlements Accounting Manager for ERM Power's highly successful "Business Energy" electricity sales subsidiary in 2007 where he was instrumental in developing, establishing and managing a wide range of backoffice solutions and processes.

A copy of Alex's resume is **attached** herewith at **Appendix G**.

#### Capacity to Comply with Licence Conditions, Codes Guidelines

The business has engaged the services of highly experienced consultants and contractors whom have deep operational experience in the NT electricity supply industry for the purposes of ensuring robust technical compliance with the relevant Power Water Corporation technical codes (Power Networks Technical Code and Design Construction Guidelines; and Systems Control Technical Code) during the design phase of the 12MW Hudson Creek Power Station.

The business has also undertaken robust business planning processes and financial modelling, and has implemented suitable frameworks for all key corporate areas, such as governance, risk management, compliance, safety and accounting, including robust corporate policies, processes and systems. These matters are elaborated upon below.



#### **Business Planning**

Trutinor NT has undertaken a comprehensive investigation of the opportunities presented in the NT electricity supply industry. Based on these investigations, detailed critical analysis has been performed resulting in the development of a detailed business plan and associated financial model that supports the case for Trutinor NT to enter the NT electricity supply industry.

Further details of Trutinor NT's business plans are attached herewith at Appendix J regarding the company's financial viability and a copy of the business plan is also attached herewith at Appendix L.

#### Legal Regulatory Matters

Trutinor NT has engaged an expert external commercial lawyer to provide specific advice regarding legal and regulatory matters.

Trutinor NT's legal advisors are a highly respected and experienced specialist electricity industry legal firm comprised of lawyers with prior experience in the NT electricity supply industry and familiarity with its regulatory framework. Their engagement includes advising on the Territory regulatory framework and compliance obligations, together with advising on the proposed commercial agreements, amongst other things.

Copies of biographies of Trutinor NT's legal advisors are **attached** herewith at **Appendix H** and **Appendix I**.

#### **Corporate Governance**

Trutinor NT has developed a comprehensive Corporate Policy Handbook to direct and govern the manner in which business is to be undertaken by the company and its employees and representatives.

The various policies contained in the Corporate Policy Handbook cover all generally recognised policy areas that would apply in a private company corporate environment, including policies for delegations, business conduct, human resources, risk management, compliance, operations, sales and trading.

A copy of the Corporate Policy Handbook is **attached** herewith at **Appendix M**.

#### Risk Compliance

Trutinor NT has policies and procedures in place regarding work health safety risk, enterprise risk, market risk, credit risk and compliance management. In addition to its overarching Compliance Policy, the company also has a specific Work Health Safety Environment Policy and Management Plan that operates at a more



detailed level in relation to the areas of project design, construction and operations contracting.

The business has also implemented an integrated risk and compliance management system that is compliant with relevant standards on risk management and compliance. The system, called Risk Manager from Incom Pty Ltd, operates as both the enterprise risk register and as the compliance management system where it will be used to record, track and monitor compliance, including reminders when compliance activities are due.

Copies of these risk and compliance policies are included in the Corporate Policy Handbook attached herewith at Appendix M and Appendix N; and the Work Health Safety Environmental Management Manual is attached herewith at Appendix O. Rimfire Group has adopted a continuous improvement philosophy to WHSE Management and Policy development, and engages a NT based specialist WHSE consultant details of which are contained in Appendix P.

#### Accounting Finance

Trutinor NT has adopted the successfully implemented accounting system utilised by the retail electricity entity of the group Rimfire Energy and integrates all aspects of the accounting and reporting process, including an integrated CRM system.

The company's Finance Operations Manager oversees the accounting, finance and reporting aspects of the business. Additionally, the company has engaged an external accounting firm to provide advisory services, primarily on taxation matters.

#### IT Systems

Trutinor NT has implemented an advanced technology IT platform utilising local servers, and will be moving to state-of-the-art hosted, virtual data-centres. The hosted data servers include multiple levels of redundancy, with daily data backups and automatic real-time failover to a fully replicated redundant datacentre.

Based on Trutinor NT's knowledge of the operations of the NT industry and with the assistance of expert operational resources who are highly experienced in developing the required electricity generation operations systems solutions, it is the intention of Trutinor NT to develop and build the necessary operational systems internally.

This includes systems solutions for storing contract and operational data, electricity export meter data management, and generation forecasting, as well



as performing generation billing and settlement calculations. Similar systems are already in operation within Rimfire Energy's retail business operations, it is the intention of Trutinor NT to further develop and build new operational systems internally as necessary.

#### **Technical Resources**

In addition to the deep industry experience of the management group, Trutinor NT management has identified and engaged a number of highly experienced electricity industry resources to assist in the variety of operational activities required to design, construct and operate an efficient and effective electricity generation business. The company has engaged the necessary resources during the various stages of greenfield power generation facilities development, being feasibility, design construct, operation maintenance.

More information on these technical resources is attached herewith at **Appendix R**.

#### **Outsourced Services**

Other than engaging with specialist consultants and advisors, as mentioned above, Trutinor NT does not intend to outsource any of its core operational functions, however where such operational functions are most efficiently provided by external expert service providers, the company anticipates investigation of engagement of such service providers as necessary.

## Financial Viability

The financial resources available to the applicant should be addressed in appropriate detail. Audited financial reports for at least three years should be provided in the first instance. The requirement for audited reports is waived in the case of newly incorporated bodies, but equivalent information should be provided in relation to the other corporations in the applicant's group.

For applicants for retail licences, the Commission will require documentary evidence that the applicant has the necessary financial capability to discharge all financial obligations to the suppliers of wholesale electricity, network access services and metering services that would arise from the reasonably expected sale of electricity by the applicant, including:

Trutinor NT provides the following details regarding its financial viability:

#### • Business Planning

As mentioned above, Trutinor NT has undertaken a comprehensive investigation of the opportunities presented in the NT electricity supply industry. Based on these investigations, critical analysis has been performed resulting in the development of a detailed business plan and associated financial model that supports the case for Trutinor NT to enter the NT electricity supply industry.

Further details of Trutinor NT's business plans are attached herewith at Appendix J regarding financial viability and a copy of the business plan is also attached herewith at Appendix L.

#### Financial Statements

Trutinor NT is a recently incorporated entity that has been established specifically for the purpose of entering the NT electricity supply market to commence electricity generating and contracting operations. Consequently, the company does not have audited financial statements. However, Trutinor NT' parent has been operating as within the NT electricity retailing market since 2014.



	an investment grade credit rating for long-term unsecured counterparty obligations; evidence that the applicant has entered into arrangements with a financial institution capable of providing suppliers with acceptable security in the form of a bank guarantee (or an equivalent facility).	While Trutinor NT intends to prepare separate financial statements for the company on a standalone basis, as a small private company there is presently no obligation or intention to have the financial statements audited.  Financial Viability Detailed information regarding Trutinor NT' financial viability is attached herewith at Appendix J.
	provide evidence that they have access to financial resources sufficient to meet the (reasonably expected) standing costs of such arrangements for a period of at least two years.	
Cross- Ownership and Ring-	Applicants should outline: the basis on which services and resources will be	Trutinor NT provides the following details regarding cross-ownership and ring-fencing:
Fencing	transacted between relevant operating areas of the applicant, or the applicant and other related entities;	Shared Resources Services Trutinor NT intends to share resources and/or services with Rimfire Energy.
	in the case of applicants that are wholly owned subsidiaries, proposed audit arrangements for the applicant and whether separate reports for the licensed entity and its parent are to be prepared and made publicly available; other guidelines or standards relating to financial separation, ringfencing, and separate audit arrangements, which the applicant intends to follow.	Financial Statement Preparation  Trutinor NT intends to prepare separate financial statements for the company on a stand-alone basis. As a small private company there is presently no obligation or intention to have the financial statements audited.
Licence Conditions	Where the applicant is seeking particular licence conditions, the nature and reasons for seeking	Trutinor NT provides the following details regarding licence conditions:
	these conditions should be explained.	<ul> <li>Trutinor NT has considered the "Terms Likely to Appear in a Generation Licence" as set out in Appendix A of the Licensing Manual and is ready to consider these and any other conditions the Commission may also seek to impose.</li> </ul>
Exemptions	Where an applicant seeks any regulatory exemptions or modifications, the nature and reasons for seeking these exemptions or modifications should be explained.	Trutinor NT provides the following details regarding exemptions:  Trutinor NT is not seeking any regulatory exemptions or modifications.
Commercially Sensitive Information	Where the applicant considers information contained in an application to be commercially sensitive, the applicant should	Trutinor NT considers the information contained in the following appendices to be commercially sensitive and/or private information and requests that this



clearly identify such information and the reason they regard it as commercially sensitive. information be treated as confidential and not made publicly available:

#### Appendix C: Corporate Structure

Trutinor NT Pty Ltd and its related entities are part of a privately owned group.

#### Appendix D: Resume of Michael Allen

Michael's resume contains personal details and other information that is considered to be private information.

#### Appendix E: Resume of Kim Howlett

Kim's resume contains personal details and other information that is considered to be private information.

#### • Appendix F: Resume of Chris Thomson

Chris's resume contains personal details and other information that is considered to be private information.

#### Appendix G: Resume of Alex Choy

Alex's resume contains personal details and other information that is considered to be private information.

## Appendix H and I: Biographies of Legal Counsel

The Biography of Legal Counsel contains information that is considered to be private information.

#### • Appendix J: Financial Viability Statement

The information contained in the financial viability statement includes details of Trutinor NT' business plans, customer strategies and prospective capital strategies, all of which are commercially sensitive.

#### Appendix K: Management Financial Statements

Trutinor NT is a private company.

#### Appendix L: Business Plan

Trutinor NT's Business Plan is confidential information.

#### Appendix M: Corporate Policy Handbook

The corporate policy handbook contains confidential internal policy documents.

#### Appendix N: Enterprise Risk Management Procedures

The Enterprise Risk Management Procedures document is confidential information.



	•	Appendix O: Workplace Health Safety Environmental Management Manual The Workplace Health Safety Environmental Management Manual document is confidential information.		
	•	Appendix P: Workplace Health Safety Environmental Management Consultant The biography of the Workplace Health Safety Environmental Management consultant is confidential information.		
	•	Appendix Q: Project Description		
	•	Appendix R: Technical Resources		



### **Appendix A: ASIC Company Extract**

#### **ASIC Data Received Report**

**Corporation Details** 

TRUTIPL Code

Name TRUTINOR NT PTY LTD

625 359 186 A.C.N. Proprietary - Other Type Class Limited By Shares **Review Date** 03 / 04 / 19

**Extract Creation Date** 17 / 04 / 18

**Current Status** Registered 03 / 04 / 18 Date of Registration Incorporated in QLD Start date for current

name

03 / 04 / 18

Registered Address

PERRIER RYAN BUSINESS ADVISORS LEVEL 1

30 LISBURN STREET EAST BRISBANE 4169 QLD

03 / 04 / 18 Effective from

**Business Address** 

LEVEL 1

48-50 SMITH STREET DARWIN 0800 NT

04/04/18 Effective from

#### No Ultimate Holding Company

Officeholders
MICHAEL JOSEPH ALLEN

138 EAST POINT ROAD FANNIE BAY 0820 NT

Born 21 / 08 / 67 at BRISBANE, QLD DIR appointed 03 / 04 / 18

SEC appointed 03 / 04 / 18

**Share Capital** 

Description Total Total Number Amount Amount unissued shares Paid Due subject to options Issued ORD ORDINARY SHARES 1.00 0.00

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### **ASIC Data Received Report**

ShareholdersMemberShare ClassNumber HeldFully Paid?Beneficial Owner?ORD1YY

TRUTINOR NT HOLDING PTY LTD LEVEL 1 48-50 SMITH STREET DARWIN 0800 NT ACN 625 509 588

#### No Current Charges

Document Details							
Form number	<b>Document Number</b>	Date of Lodgement	Date Processed	<b>Effective Date</b>			
201	5E5650492	03 / 04 / 18	03 / 04 / 18	03 / 04 / 18			
484	6E5760519	12 / 04 / 18	12 / 04 / 18	04 / 04 / 18			
484	6E5760587	12 / 04 / 18	12 / 04 / 18	11 / 04 / 18			

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## **Appendix B: Certificate of Registration**

# Certificate of Registration of a Company



This is to certify that

#### TRUTINOR NT PTY LTD

Australian Company Number 625 359 186

is a registered company under the Corporations Act 2001 and is taken to be registered in Queensland.

The company is limited by shares.

The company is a proprietary company.

The day of commencement of registration is the third day of April 2018.

Issued by the Australian Securities and Investments Commission on this third day of April, 2018.

James Shipton Chair