Request for IBAC assessment

Melbourne Renewable Energy Hub and Victorian AI Hub at Plumpton

To the Independent Broad-based Anti-corruption Commission
From Matthew Luke De Angelis
10 November 2026
Contact details provided in the covering email

Dear Assessment Team,

I request an assessment of the public investment decisions concerning the Melbourne Renewable Energy Hub (MREH), and any material connection between those decisions and Syncline Energy's subsequent Victorian AI Hub proposal at Plumpton.

I am contesting Sydenham as an independent at the 28 November 2026 Victorian state election, and I disclose that political interest so IBAC can assess this submission with that context.

The State Electricity Commission (SEC) announced a $245 million investment in MREH in November 2023. Syncline, which originated the battery project, later described a large data-centre precinct beside it. The unresolved issue is whether any such proposal existed before the investment, who knew about it, and whether it affected investment selection, valuation, contracts or later planning. [1–4, 8–10]

The public record does not establish that the AI Hub was contemplated in 2023, that information was improperly withheld, or that any person acted dishonestly. I am providing a documented chronology and questions for assessment, rather than asserting those events occurred. This submission contains no insider account, non-public contract or evidence of a payment for influence.

Action requested

1. Receive this submission and assess whether the information, including any relevant material already held by IBAC, warrants preliminary inquiries or another response within your jurisdiction.

2. If preliminary inquiries are appropriate, prioritise the original investment proposal, the earliest documented AI Hub concept, and any land or connection agreements linking the projects. These records would test the central concern before wider inquiries are considered.

3. Determine whether any substantiated conduct warrants investigation or referral. If the material instead raises administrative, audit or disclosure issues, advise on or refer it to the appropriate body, subject to lawful information-sharing requirements.

4. Confirm receipt, provide a reference number and advise whether further particulars are needed. Please also assess whether any part qualifies for treatment under the Public Interest Disclosures Act 2012.

I recognise that the battery has an independent grid-storage purpose and that the SEC ran a public investment search. Those facts are included below because they are essential to a fair assessment. [1, 2, 6, 7]

1 Public chronology

Dates establish the sequence of public records. They do not establish when a private idea was first conceived or communicated to government.

Date	What the record establishes
Late 2018	Syncline's retrospective account dates MREH's origination to late 2018. [4]
30 July 2021	Amendment C225melt (gazetted 30 July 2021) applied battery and solar site controls. The incorporated document was dated April 2021. This was not an AI Hub approval. [5]
Early 2022	Syncline dates Equis's shareholding to February 2022. Galloway's Monash profile describes Equis becoming majority owner in early 2022. [4, 20]
November 2022	Infrastructure Pipeline dates Equis's acquisition to November. Equis's 17 November release states 100% ownership and joint development with Syncline. These may describe stages of one transaction; the agreements would establish the sequence. [19, 21]
27 April 2023	The government announced the Pioneer Investment Mandate and a registration process opening on 2 May. Discussions with potential investors were already occurring; the announcement did not identify them. [1]
October to November 2023	SEC Infrastructure was incorporated on 26 October and declared a state-owned company on 14 November. These are corporate milestones, not evidence of an irregularity. [22]
30 November 2023	Government and Equis announced the SEC investment and financial close. The government reported more than 100 registrations of interest. Equis described the investment and battery offtake arrangements. [2, 3]
December 2023	Syncline says it handed project delivery to Equis. Its account does not establish whether every land right, fee or other commercial interest ended. [4]
November 2025	SEC reports MREH entered commercial operation. The battery was generating grid revenue by that date. [6, 7]
February 2026	Syncline's submissions to the Australian Energy Market Operator (AEMO), dated 12 and 15 February, describe the Victorian AI Hub. AEMO's Integrated System Plan consultation lists Syncline's entry on 23 February. [8–10]
29 May 2026	The Age reported the proposed precinct. An archived copy has been reviewed. This is not the earliest public record identified here. [11]
July to October 2026	Council published a planning-status statement on 16 July. ABC reported the proposal on 23 September. October's state accounts record SEC ownership and voting rights. [12–14]

What this chronology leaves open

The first documented approach for SEC investment, the date the AI concept emerged, and any earlier disclosure to public decision-makers remain unresolved by these sources. A later media report cannot prove an earlier plan was concealed. Equally, a public investment announcement does not disclose every assumption or agreement behind the transaction.

2 Entities and public interests

The following names identify relevant roles and possible record holders. Their inclusion does not allege misconduct or establish that each participated in every decision.

Entity or person	Established role and relevance
SEC Victoria Pty Ltd and SEC Infrastructure Pty Ltd	State-owned energy company and investment subsidiary. The state accounts identify SEC Infrastructure as the holder of the joint-venture interests. [14, 18]
Equis and GreenPoint Energy	Equis announced the 2023 investment partnership. SEC now identifies its battery co-owner as GreenPoint Energy, an Equis subsidiary. The legal parties to each agreement should be confirmed. [3, 6]
Syncline Energy Pty Ltd and Phil Galloway	Battery originator and proponent of the AI Hub. Galloway signed the AEMO submissions as managing director. [4, 8, 9]
Relevant ministers and public officials	People who assessed, authorised or advised on investment, planning, energy policy and investment facilitation. Their identities and roles at each decision date should come from the records.
Advisers and project counterparties	Investment, legal, technical and planning advisers, land counterparties and network asset owners, insofar as their work or contracts inform the matters below.

Ownership is different from voting and dispatch

The 2025–26 state accounts report SEC interests in GP Energy (MREH A1 HoldCo) Pty Ltd and GP Energy (MREH A2 HoldCo) Pty Ltd of 30% ownership and 30% voting rights each. A3 HoldCo is reported at 47% ownership and 49% voting rights. SEC separately reports full dispatch rights over A3, meaning control of its charging and discharge under the relevant arrangement. [7, 14]

Equis's November 2023 release described 49% SEC ownership of the four-hour component. The later ownership and voting figures warrant reconciliation against the agreements and capital history. The figures alone establish neither a loss to the state nor an irregular transaction. [3, 14]

Limits of the ownership evidence

Public co-ownership of battery project companies does not prove ownership of every surrounding lot, the proposed data-centre land or the AI Hub itself. No SEC shareholding in Syncline or confirmed SEC supply contract with the AI Hub is established by the sources in this submission. Any remaining Syncline rights or Equis role in the AI Hub must be established separately.

Agency names used below

DTP is the Department of Transport and Planning; DJSIR is the Department of Jobs, Skills, Industry and Regions; DEECA is the Department of Energy, Environment and Climate Action; DTF is the Department of Treasury and Finance; DPC is the Department of Premier and Cabinet; and EPA is Environment Protection Authority Victoria. References include predecessor teams where they held the relevant records.

3 How the investment and AI proposal began

The first approach for public investment

The SEC publicly sought renewable-energy investments. That is relevant evidence of an ordinary investment process. The unanswered question is how MREH entered that process and what information accompanied it. [1, 2]

1. Who first proposed SEC participation in MREH, to whom, on what date and through which channel? Was it Equis, Syncline, a government official, an adviser or another party?

2. Was there project-specific contact before the public registration process opened? What was discussed, what commitments or assurances were given, and how was that contact recorded?

3. Which legal entity lodged the registration, investment proposal and later revisions? Which people prepared, reviewed and approved them?

4. What assessment criteria, competing proposals, independent advice and approvals supported the selection? Were any exceptions made, and if so were they authorised and documented?

When the AI Hub concept emerged

5. What is the earliest dated concept, feasibility study, site plan, investor presentation, land option or network enquiry for a data centre at or beside MREH, including under an earlier project name?

6. Was a data centre or other major private electricity customer contemplated before the SEC's investment decision or financial close? If so, how developed was that concept and who held the information?

7. When did SEC investment staff, its board or committees, shareholder representatives, departments and ministerial offices first receive any such information? Who received it and what action followed?

8. If an earlier concept existed, was it relevant to the investment's value, risks, land, network infrastructure or expansion? What disclosure was required by the transaction documents or public duties, and was it made?

9. If the AI concept arose only after the investment, which dated records demonstrate that sequence? Were later changes considered under normal approval and commercial processes?

What these inquiries would establish

These records would distinguish an independently justified battery investment followed by a later neighbouring proposal from any material undisclosed dependency. Earlier knowledge would not itself establish wrongdoing. Its significance would depend on what was known, the obligations to disclose it, and whether it affected a public decision.

I do not ask IBAC to infer a concealed plan from the time needed to develop a large project, the parties' industry experience or the interval between announcements.

4 Investment terms, land and private benefit

Whether the state received a properly assessed bargain

The relevant concern is any improper distortion of the public investment or its terms. Private investors earning a return from a lawful partnership is an expected commercial outcome.

1. What financial model and investment case supported the SEC commitment? Which assumptions covered electricity prices, storage revenues, battery life, connection rights and future demand?

2. Was any data-centre scenario included in valuations, financing discussions or forecasts? If so, was the same material information available to the state and private participants?

3. What did public capital add in timing, scale, storage duration or risk allocation? Was the assessment tested against a project without SEC participation and against the available alternatives?

4. How were capital contributions, debt, guarantees, development fees, related-party payments, distributions and downside risks allocated? Were material departures from independent advice explained and approved?

5. Did any contract give a private participant access to public-funded capacity, land or infrastructure on terms that were not independently assessed? What rights or compensation protected the state?

6. Have amendments, capital restructures or transfers changed the original allocation of value or risk? In particular, what explains A3's reported ownership and voting interests?

Land boundaries and continuing commercial interests

7. Which registered lots form the battery site, its connection corridor and each version of the proposed AI precinct? Who held title, leases, options, easements or beneficial interests at the relevant dates?

8. Did Syncline or an associated entity retain royalties, development fees, contingent payments, land rights or other interests after project delivery passed to Equis? If so, were they relevant to and disclosed in public decisions?

9. Does Equis, GreenPoint or any MREH entity have an ownership, landlord, development, supply or infrastructure role in the AI Hub? What agreements and dates establish that role?

10. Was any public investment used to acquire or improve an asset later made available to the AI project? If so, who paid, who benefited and what valuation or approval supported the arrangement?

11. How do February's 500-hectare descriptions reconcile with the later 350-hectare reports? Was the proposal reduced, or do the figures cover different land or infrastructure? [8, 9, 11, 12]

12. How much of the battery landholding is occupied by the built facility, reserved for expansion or available for another use? Distinguish the developed footprint, approved boundary, land under contractual control and wider AI precinct.

Amendment C225melt (gazetted 30 July 2021) identifies battery-related land at 77–347 Holden Road and 67 and 77 Victoria Road. A shared street address or smaller developed battery footprint cannot establish ownership or availability of surrounding land. The relevant evidence is the lot-level map and the interests recorded against it. [5]

5 Electricity, storage and planning decisions

Power supply, dispatch and possible expansion

MREH currently provides 600 MW of power and 1.6 GWh of storage. Syncline's February submission refers to possible further storage. A battery stores electricity; proximity alone does not make it the AI Hub's dedicated supply. Neither expansion approval nor a supply agreement can be inferred from the proposal. [6, 8]

1. Has any party sought or negotiated an AI Hub agreement for battery dispatch, electricity supply, storage, firming or access to connection assets? Identify the parties, dates, approvals and any exclusivity.

2. Would any arrangement constrain SEC's existing dispatch or other customer obligations? How would pricing, cost recovery, operational priority and risks be assessed?

3. What is currently approved, financed or contracted for any further battery stage? Has an AI customer been included in that business case or any request for additional public capital?

4. Which assets would actually be shared: cables, switchyards, transformers, connection capacity, land or services? Who owns each asset, funds its expansion and bears interruption or failure risk?

5. Do any agreements depend on planning approval, and do they expressly preserve the planning decision-maker's independence? Have public bodies incurred liabilities that could create pressure to approve?

Planning and investment promotion

The state promotes data-centre investment and can determine applications through ministerial pathways. Council's July statement and the current planning guidance establish roles and process, but do not establish the AI Hub's present application status or decision route. [13, 15, 16]

6. What planning process has occurred, under which names and provisions, and with what status? Give each application's lodgement date and whether it is new or amends an earlier application or permit. The Minister's Statement excludes applications lodged on or before 22 September 2026 and specified related amendments. Which requirements apply here? [23]

7. Who is responsible for each planning decision and what conflict declarations, separation of teams or independent advice address the state's commercial interests?

8. Has anyone asked an assessor to alter, accelerate, limit or omit an assessment because of the SEC investment, a commercial agreement or an investment-promotion objective? What record supports any such direction?

9. Were any project-specific assurances about approval, exemptions, infrastructure or public funding given before assessment? What authority and qualifications accompanied them?

10. If the proponent contributed to policy development, what consultation occurred and how was it recorded? Is there evidence that any rule was improperly tailored for a private benefit?

Using a lawful ministerial planning pathway or discussing a proposal with government is not itself improper. The relevant issue is the integrity of the decision and the handling of competing interests.

6 Access, personnel and information

The people who participated in decisions

The decision record should identify who assessed the 2023 investment and later proposals. The November announcement names the then Premier Jacinta Allan, SEC Minister Lily D'Ambrosio, Member for Sydenham Natalie Hutchins, Member for Sunbury Josh Bull and Equis managing director David Russell. It does not establish their participation in each negotiation. [2]

1. Who participated in the investment selection, valuations, commercial negotiations, planning advice and investment-facilitation meetings? What was each person's role and delegated authority?

2. Which actual, potential or perceived conflicts were declared? What management, recusal, independent review or restrictions on access to information followed?

3. Which representatives or advisers contacted government for the relevant entities, and who arranged the meetings? Were records kept of substantive advice, requests, commitments and follow-up?

4. Was confidential government information used or disclosed outside an authorised purpose in connection with either project? This submission supplies no evidence that this occurred; the issue would warrant pursuit only if the decision records indicate a concrete concern.

5. If records identify relevant gifts, hospitality, employment negotiations, political donations or personal interests, were applicable disclosure and conduct obligations met? I provide no evidence of such a benefit or improper connection and do not ask IBAC to presume one.

The information gap for residents

The public information is spread across developer submissions, state accounts, project announcements and planning guidance. Residents cannot reconstruct the underlying contracts, decision history or current site boundaries from those documents alone. The different land and capacity descriptions make a dated, consistent account particularly important.

This is an information asymmetry: the parties developing and assessing the proposal may hold material that residents need to understand a decision affecting them. Obtaining basic public-interest information should not depend on citizens commissioning title searches, interpreting company structures and making numerous requests across agencies.

That concern does not, by itself, establish corrupt conduct or an obligation to publish every commercially sensitive document. The integrity question is whether material information was improperly withheld from a decision-maker, falsely presented, or kept from a process in which disclosure was required. Wider publication and consultation failures may require a different oversight response.

Records that could test it

The relevant evidence includes meeting registers, minutes and diary entries; project correspondence and versions of advice; declarations and management plans; and records explaining public statements, consultation decisions and any restrictions on disclosure. The assessment should include both information that supports the concern and information that resolves it.

7 Community impacts and public costs

These are unresolved assessment questions, not findings that harm has occurred. They are included because the allocation of public costs and private benefits may be relevant to investment or approval decisions. They are primarily matters for the responsible planning, environmental, transport and utility bodies unless evidence connects them to improper conduct.

Issue	Information needed and likely responsible bodies
Roads and traffic	Construction and operational traffic forecasts; heavy and oversize vehicle routes, restrictions and approvals; school and residential access; intersection capacity; pavement damage and maintenance funding. DTP, Melton Council, road managers and the proponent.
Noise and people	Baseline and cumulative noise studies, including cooling equipment, substations, generators and testing; night operation, vibration, lighting, dust and nearby sensitive uses; monitoring, complaint response and enforceable mitigation. EPA, DTP, council and the proponent.
Water and drainage	Demand by stage and cooling method; recycled and potable supply; drought scenarios, wastewater, stormwater and infrastructure costs; effects on existing customers. Relevant water authorities, EPA and the proponent.
Electricity and gas	Actual demand and flexibility; new generation and firming; connection upgrades, tariffs and who pays; reliability effects; status of the gas facilities described in February. Relevant energy bodies, network operators, EPA and the proponent.

Issue	Information needed and likely responsible bodies
Safety and environment	Battery and generator hazards, emergency access, fire response, air emissions, fuel storage, ecology and cultural heritage assessments. Relevant emergency services, environmental and planning authorities and Traditional Owner bodies.
Economy and land use	Construction jobs versus ongoing jobs; skills and local procurement; opportunity costs of land and infrastructure; rates, grants, concessions, subsidies and any guarantees. Council, DJSIR, DTF and the proponent.
Liability and long term costs	Who funds compliance, road renewal, decommissioning and remediation; financial security and responsibility if an operator changes, becomes insolvent or abandons a stage. Approving and contracting bodies.

For IBAC, the narrower question is whether a required assessment was dishonestly altered, a material risk knowingly or recklessly disregarded in breach of public trust, or costs improperly shifted to the public for a private benefit. An uncertain impact, disputed forecast or unpopular approval is not enough to establish that conduct.

If these matters fall outside your jurisdiction, an appropriate referral or clear direction to the responsible body would help residents pursue them without confusing planning objections with an integrity complaint.

8 Priority records for initial assessment

This schedule identifies records that could test the central concern. It is not a freedom-of-information (FOI) request or a demand that every category be obtained. IBAC should select a proportionate scope and the lawful means of obtaining information.

R1 Origin of SEC participation

Likely holders: SEC and predecessor project teams, DEECA, DTF, relevant ministerial offices, Equis and advisers. Seek the earliest approach, registration, investment proposal, meeting records and revisions, including records predating SEC Infrastructure's incorporation. Priority period: 1 January 2022 to 31 December 2023, extending earlier where a record points to a relevant approach. This would establish who solicited whom and on what terms. [22]

R2 Investment selection and authorisation

Likely holders: SEC, its investment and board committees, shareholder departments, predecessor teams and advisers. Seek the mandate, criteria, shortlist and comparative assessment, due diligence, valuation, final investment paper, approvals and exceptions. Priority period: all of 2023, including work before SEC Infrastructure's incorporation. This would test the decision against its authorised purpose and available alternatives. [22]

R3 Earliest AI Hub concept and disclosure

Likely holders: Syncline, Equis or GreenPoint if involved, SEC, DJSIR and Invest Victoria, DTP, DEECA, DPC and relevant advisers. Seek the earliest dated concept, site acquisition or option instruction, feasibility work, investor presentation, network enquiry and communication to government. Begin with records up to 30 November 2023 and trace forward to the February 2026 submissions. This would establish whether a pre-investment connection existed at all.

R4 Transaction and valuation assumptions

Likely holders: SEC Infrastructure, the MREH entities, counterparties and transaction advisers. Seek signed investment and shareholder agreements, schedules, side letters, offtake and dispatch agreements, valuation models and approved changes. Include versions actually relied upon, rather than every duplicate. This would show the rights purchased, relevant disclosures and allocation of risks and benefits.

R5 Land and connection interests

Likely holders: project entities, land counterparties, Land Use Victoria and relevant network asset owners. Seek dated lot maps, titles, leases, options, easements, connection and shared-asset agreements, relevant valuations and payment schedules. Trace material interests at the investment date and subsequent changes. This would test whether public-funded assets or continuing private rights connect the projects.

R6 Conflicts and decision participants

Likely holders: the responsible agencies, SEC, relevant boards and ministerial offices. Seek decision-specific participant lists, delegated authorities, declarations, conflict management plans, recusals, probity advice and records of external directions. This would distinguish normal public and commercial roles from any unmanaged personal interest or improper influence.

9 Follow-up records and search scope

R7 Later supply or expansion arrangements

SEC, MREH entities, Syncline and any identified counterparties: discussions and agreements for an AI customer, further battery investment, power purchase, dispatch, firming or shared infrastructure; pricing and risk assessments; public guarantees or commitments. Period: 1 December 2023 to the submission date. These records would establish whether a commercial link developed later and how it was authorised.

R8 Planning and investment facilitation

DTP, DJSIR and Invest Victoria, DEECA, DPC, Melton Council and relevant ministerial offices: pre-application advice, case registers, meetings, proposed assistance, eligibility assessments, referrals, directions and records of interactions between commercial and planning teams. Include any handling through an investment front door or equivalent service. These records would test independence and identify actual commitments.

R9 Material impacts and public liabilities

The authorities and parties listed in section 7: studies and advice relied on for a public decision, funding or cost-allocation agreements, material changes and reasons for accepting or rejecting recommendations. Obtain this material if the initial assessment identifies a relevant decision or concern. This would test whether that decision was accurately informed.

R10 Communications and disclosure history

Relevant agencies and ministerial offices: substantive project correspondence, public briefing drafts where material facts changed, consultation plans and recorded reasons for withholding or delaying information. This would establish what decision-makers and the public were told, and whether any omission had a lawful and documented basis.

How to keep the search focused

Use the names Melbourne Renewable Energy Hub, MREH, Melton Renewable Energy Hub, Victorian AI Hub, Plumpton AI Hub, Syncline Energy, Phil or Philip Galloway, Equis and GreenPoint, together with identified project entities and earlier names.

Link address searches to the Gazette's battery-site addresses and then to verified lot identifiers. Do not treat every document mentioning Plumpton or a data centre as relevant.

For investment origins, prioritise 2022–2023. Examine earlier material from 2018–2021 only where needed to trace the site strategy, land interests or an earlier AI concept. Extend later searches to the actual submission date.

Where relevant and lawfully obtainable, include native documents, attachments, revision history and business communications on approved or other channels. Metadata can distinguish preparation dates from later circulation.

Ask relevant holders to preserve material if IBAC considers that appropriate. This is a precaution against ordinary record loss, not an allegation that records have been destroyed. Privilege and statutory restrictions should be addressed through the applicable process.

10 Jurisdiction, outcomes and handling

Assessment under the current law

I ask IBAC to apply the Act effective 2 October 2026, including sections 3, 4 and 6, the preliminary-inquiry provisions, section 60 and the transitional provision in section 200. Section 4 requires qualifying conduct constituting an offence or a serious disciplinary matter. The section 3 definition of serious disciplinary matter expressly includes serious contraventions of specified codes, including a code applying to a responsible Minister or Parliamentary Secretary. This is relevant to section 6 of this submission; all statutory elements must still be met. [17]

The amendments also expand coverage of associated entities. Please determine the applicable entity coverage and rules for past conduct. An investigation requires reasonable grounds to suspect corrupt conduct; a preliminary inquiry can inform whether to dismiss, refer or investigate. State ownership or receipt of public money does not replace that legal analysis. [17]

What a proportionate assessment could achieve

Confirm whether an AI proposal existed before the public investment, and whether any connection was material and properly disclosed.

Identify the actual contractual and land relationships, rather than infer them from physical proximity or project branding.

Establish whether investment and planning decisions were properly informed and conflicts appropriately managed.

Identify any specific conduct warranting further investigation, or establish that the apparent overlap has an ordinary, documented explanation.

Direct remaining questions about administration, value for money, public disclosure or project impacts to a body able to address them.

Requested response and confidentiality

Please advise whether the submission is accepted for assessment, whether further particulars are required, and any decision or referral that can lawfully be communicated. If it does not provide a sufficient basis for action, please identify the principal evidentiary gap where possible. I do not request confidential investigative material or a predetermined finding.

Please handle my identifying and contact details confidentially to the extent permitted by law. Please assess any applicable public-interest-disclosure status and advise me about the protections and confidentiality obligations that apply. I do not assume that protection arises merely because I have used that term. Where practicable and lawful, please notify me before a referral discloses my identity.

This submission relies on the public sources indexed below. It does not attach contracts, witness statements, title searches or FOI responses, and should not be read as claiming that these have been obtained. Questions and possible lines of inquiry are identified as such.

My request is for an independent assessment of the decisions and the information that informed them. The same examination should be capable of resolving the concern if the records show the projects were handled properly.

Yours faithfully,
Matthew Luke De Angelis

11 Source index

The numbered references identify public material supporting the factual account. Linked records are supplied as references, not represented as downloaded exhibits. Web material was checked on 10 November 2026, Melbourne time. A source establishes what it records; it does not establish every underlying fact or an absence of other records.

[1] Victorian Government announcement of the Pioneer Investment Mandate

27 April 2023. Establishes the public search opening on 2 May, earlier discussions with potential investors and investment criteria. It does not identify the first MREH approach or participants in those discussions.

[2] Victorian Government announcement of the SEC investment in MREH

30 November 2023. Records the $245 million commitment, battery purpose and expansion, and more than 100 registrations of interest. It is evidence of the stated investment rationale, not the complete investment assessment.

[3] Equis announcement of financial close and construction

30 November 2023, pages 1–2. Records equity contributions, initial component ownership, SEC offtake and future expansion. A contemporaneous counterparty statement; signed agreements are needed to establish the full terms.

[4] Syncline project history for MREH

Retrospective company webpage. Supports the attributed account of origination, Equis entry and delivery handover. Its shorthand ownership and planning descriptions are not adopted over the state

accounts or Gazette. Handover does not prove every commercial interest ended.

[5] Victoria Government Gazette S 412

30 July 2021, page 4, Amendment C225melt. Establishes the battery and solar planning action, addresses and April 2021 incorporated-document date. It does not establish present land ownership or AI Hub approval.

[6] SEC current MREH project page

Identifies GreenPoint Energy as an Equis subsidiary and co-owner, the SEC investment, operating capacity and completion. Does not establish an AI supply agreement or ownership of the proposed data-centre land.

[7] SEC Annual Report FY26 summary

Sections on investment and critical energy assets. Records November 2025 commercial operation, full A3 dispatch rights and market effects on revenues. This reference is to the published web summary, not a claim to have reviewed every page of the FY26 report.

Source index continued — references 8 to 14

[8] Syncline response to the Draft 2026 ISP consultation

Dated 12 February 2026, pages 1–2. Describes 500 hectares, eight data centres and 3.1 GW, near MREH, with gas generation and reclaimed water. Also refers to possible further battery storage. These are proponent descriptions, not approvals or evidence the concept existed in 2023.

[9] Syncline response to the Transition Plan for System Security

Dated 15 February 2026, pages 2–3. Describes a 500-hectare precinct, infrastructure supporting up to 3.2 GW and three 200 MW gas turbines. It does not establish which elements remain in the current proposal.

[10] AEMO Draft 2026 ISP consultation listing

Lists Syncline Energy's submission with the date 23 February 2026. Distinguishes the consultation listing from the document's 12 February date. It does not prove this was the first disclosure anywhere.

[11] The Age report accessed through an archived copy

Daniella White, The data centre mega-hub being quietly mapped out in Melbourne's west. The reviewed copy displays 29 May 2026 at 11:48 am; 20260522 in the URL is not its displayed dateline. Reports 350 hectares and 2.4 GW; archive captured 30 May. Used for media chronology and proposal descriptions, not proof of private discussions or misconduct.

[12] ABC report of the Senate data centre inquiry

23 September 2026, updated 24 September. The Plumpton section reports 350 hectares and 2.4 GW and attributes statements to Galloway. Reports about impacts at other data centres do not establish impacts at Plumpton. The article is not a current planning register.

[13] Melton Council statement on data centre approvals

16 July 2026. Records council's role, informal contact about Plumpton and no formal state notification at that date. It cannot establish the position at the date this submission is lodged.

[14] Victorian 2025 to 2026 Financial Report

Released 15 October 2026, printed page 81, PDF page 87. Table distinguishes ownership interests from voting rights: A1 30/30, A2 30/30 and A3 47/49. Establishes the reported SEC Infrastructure interests, not the complete commercial rights or reasons for changes.

Source index continued — references 15 to 23

[15] DTP Sustainable Data Centre Action Plan guidance

Updated 14 October 2026. Describes investment and coordination objectives and the Planning Minister's expectations for applications lodged from 23 September 2026. Further planning controls are described as forthcoming. This does not establish which provisions apply to particular AI Hub lots.

[16] DTP expedited planning pathways guidance

Explains ministerial assessment pathways. Relevant processes can retain notice and council input while excluding usual third-party merits review. The actual application route, exemptions and review rights need project-specific confirmation.

[17] Independent Broad-based Anti-corruption Commission Act 2011

Authorised version 051, effective 2 October 2026. Relevant provisions include sections 3, 4, 6, 51, 59A–59P, 60 and 200. IBAC must determine their application to the information, entities and dates in this submission.

[18] SEC governance statement

Identifies SEC Victoria's legal status and governance arrangements. Current board membership alone does not identify historical decision-makers or establish that a particular conflict arose.

[19] Equis launch announcement for MREH

Dated for release 17 November 2022, page 1. States that MREH was 100% Equis-owned and jointly developed with Syncline. Distinguishes ownership from continued development work. The filename is not the release dateline; the statement does not establish every transaction completion date.

[20] Monash University profile of Philip Galloway

December 2024 speaker profile. Describes Equis becoming majority owner in early 2022 and Syncline developing MREH through commencement of construction. A retrospective biographical account; transaction records are needed for the exact sequence.

[21] Infrastructure Pipeline MREH project chronology

Records Equis acquiring a 100% stake in November 2022 and the former Melton Renewable Energy Hub name. Used alongside Equis's contemporaneous release, rather than as conclusive evidence of contractual completion dates.

[22] SEC Infrastructure Annual Report 2023–24

Printed pages 6 and 25, PDF pages 7 and 26. Records incorporation on 26 October 2023 and declaration as a state-owned company on 14 November 2023. These dates identify the need to include predecessor teams' records in R1 and R2; proximity to financial close does not itself imply impropriety.

[23] Minister for Planning Statement of Expectations for data centres

Signed 5 October 2026. Page 1 applies the statement to applications lodged on or after 23 September 2026. It excludes applications lodged on or before 22 September, amendments to those applications before decision, and applications to amend permits granted in relation to them. The actual lodgement history determines its relevance.

12 Summary

Summary of this request.

I request assessment of the SEC's November 2023 investment in the Melbourne Renewable Energy Hub and any material connection with Syncline Energy's subsequent Victorian AI Hub proposal at Plumpton. This submission identifies the public chronology, SEC co-ownership, the developer's February 2026 descriptions, and specific records that could establish when the AI concept arose and what public decision-makers knew.

The concern to assess is whether any material information, commercial dependency or conflict was improperly handled in investment or later planning decisions. I do not have evidence establishing an undisclosed 2023 AI plan, dishonest conduct or improper benefit. The submission acknowledges the formal SEC investment search and the battery's independent grid purpose. I ask IBAC to assess whether preliminary inquiries are warranted, seek further particulars if needed, and determine whether investigation or referral is appropriate.

I am contesting Sydenham as an independent at the 28 November 2026 Victorian state election and disclose that political interest for context.