



Wednesday, 29 July 2009

The Manager
Company Announcements
Australian Stock Exchange Limited
20 Bridge Street
SYDNEY NSW 2000

Dear Sir / Madam

DELOITTE 2009 DISTRIBUTION AND INTEREST TAX GUIDE

Please find attached the 2009 Distribution and Interest Tax Guide prepared by Deloitte for Spark Infrastructure.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Alex Finley", with a large, stylized flourish at the end.

Alexandra Finley
Company Secretary

The Directors
Spark Infrastructure RE Limited
(in its capacity as trustee of Spark Infrastructure Trust)
Spark Infrastructure Holdings No.1 Limited
Spark Infrastructure Holdings No.2 Limited
Spark Infrastructure Holdings International Limited

27 July 2009

Dear Directors

**Spark Infrastructure
2009 Distribution and Interest Tax Guide ("The Guide")**

We have been asked to prepare this Guide to assist with the completion of Spark Infrastructure's Australian resident investors' Australian income tax returns for the year ended 30 June 2009 (the 2009 year). It has been prepared on the basis that investors are individuals who are residents in Australia during all of the 2009 year and who have held their investment in Spark Infrastructure throughout the 2009 year.

Investors who purchased or sold their investment in Spark Infrastructure during the 2009 year should seek advice from their own professional taxation adviser.

This Guide is not intended to constitute tax advice and investors should seek independent professional advice that considers the tax implications in respect of their own specific circumstances.

Spark Infrastructure comprises the Spark Infrastructure Trust, Spark Infrastructure Holdings No 1 Limited, Spark Infrastructure Holdings No 2 Limited and Spark Infrastructure Holdings International Limited. Its stapled securities comprise one unit in the Spark Infrastructure Trust, a Loan Note issued by the responsible entity of the Spark Infrastructure Trust, one share in each of Spark Infrastructure Holdings No 1 Limited and Spark Infrastructure Holdings No 2 Limited and one CHESS Depository Interest representing one share in Spark Infrastructure Holdings International Limited.

SECTION A

(i) Spark Infrastructure Trust Distributions

All distributions made by Spark Infrastructure in the 2009 year were made by the Spark Infrastructure Trust. No dividends were paid by the corporate entities in Spark Infrastructure.

Distribution	Date paid	Total Distribution per unit \$	No of units	Gross distribution \$	Interest income per loan note \$	Credit for TFN withheld \$	Tax deferred amount per unit \$	Net distribution \$
Interim	15 Sep 08	0.0925			0.0677		0.0248	
Final	13 Mar 09	0.0926			0.0685		0.0241	
Total		0.1851			0.1362		0.0489	
Label on 2009 Tax Return (Supplementary Section)					13U	13R		
Notes		1			2	3	4	

Notes

1. Conduit foreign income

The total distribution per unit does not include any conduit foreign income.

2. Interest income

This amount represents interest income on the Loan Notes and is taxable to Australian Resident investors. Interest income (\$0.1362 multiplied by the number of loan notes held) is included as non-primary production income and must be disclosed at Label 13U of the 2009 Tax Return (Supplementary Section) an extract of which is shown in Appendix A.

3. Credit for Tax File Number ("TFN") amounts withheld

This amount represents amounts withheld from Spark Infrastructure Trust's distributions to investors who are residents and have not quoted their TFN or Australian Business Number ("ABN"), where applicable, or have not advised Spark Infrastructure of their eligibility for an exemption from the TFN or ABN quoting requirements. In such a case, income tax at the highest marginal rate may have been deducted from distributions to investors. Investors may claim a credit or refund by including the amount at Label 13R of the 2009 Tax Return (Supplementary Section) if the amounts withheld have not previously been refunded. Please refer to the extract of the 2009 Tax Return (Supplementary Section) at Appendix A.

The amount of tax withheld, if any, should be located on an investor's distribution statement.

4. Tax deferred amount

In general, capital distributions from the Spark Infrastructure Trust should not be subject to Capital Gains Tax ("CGT") in the hands of an Australian resident investor if the distributions do not exceed the cost base of the investor's units in the Spark Infrastructure Trust, as these are tax deferred distributions. If the cumulative capital distributions are in excess of the cost base, the excess will give rise to a capital gain. Individual investors may be entitled to CGT discount treatment if they hold their interests for at least 12 months before such capital distributions. Such tax deferred capital distributions will arise as a result of the repayment to the Spark Infrastructure Trust of loan principal.

The tax deferred distributions made to date by the Spark Infrastructure Trust are unlikely to have reduced the CGT cost base of investor's units in the trust to zero and therefore it is unlikely that investors would be deemed to have derived a taxable capital gain in the manner described above.

Disclaimer

This letter is general in nature and is not intended to be an authoritative or complete statement of relevant law or taxation consequences that flow from each investment. It is not intended to consider the specific objectives, situation or needs of each investor, which can affect the taxation impact of ownership of their Securities. Investors should not rely on this summary only and should seek appropriate independent professional advice that considers the taxation implications in respect of their own specific circumstances.

Yours sincerely



Chris Leach

Director, Deloitte Touche Tohmatsu Ltd

Encl.

Appendix A: Tax Return for Individuals 2009 (Supplementary Section), section 13 extract

