



ISSN Print: 2664-8792  
ISSN Online: 2664-8806  
Impact Factor: RJIF 8.54  
IJRM 2025; 7(2): 434-441  
[www.managementpaper.net](http://www.managementpaper.net)  
Received: 22-07-2025  
Accepted: 25-08-2025

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## Risk allocation and contract models in renewable energy PPPs: A comparative study

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DOI: <https://www.doi.org/10.33545/26648792.2025.v7.i2e.480>

### Abstract

The global energy sector is undergoing a profound transformation, driven by the urgency to mitigate climate change, diversify supply, and reduce fossil fuel dependence. Renewable energy (RE) technologies such as solar, wind, hydro, and biomass have shifted from peripheral options to mainstream contributors, yet the scale of investment required far exceeds government fiscal capacity. Mobilizing private capital and expertise has therefore become essential, with Public-Private Partnerships (PPPs) serving as a key mechanism to structure renewable energy projects.

The success of PPPs, however, depends critically on how risks are allocated between public and private actors. Risks in renewable energy PPPs are multidimensional, encompassing land acquisition, regulatory volatility, technology failure, construction delays, demand shortfalls, and currency fluctuations. Poor allocation often leads to cost overruns, disputes, or project failure, undermining investor confidence and threatening national transition goals.

This paper critically examines risk allocation and contract models in renewable energy PPPs through comparative case studies from India, Australia, and Africa. India's solar parks highlight tariff and land challenges, while Australia's renewable energy zones underscore the complexities of transmission PPPs. In Africa, Kenya's Lake Turkana Wind Project and South Africa's Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) illustrate the role of donor backing, sovereign guarantees, and transparent procurement in mitigating risks.

The study evaluates PPP contract models, BOT, BOOT, DBFO, and FIDIC-based EPC demonstrating their implications for financing, risk-sharing, and sustainability. It proposes a structured risk allocation framework that assigns risks to the party best able to manage them, supported by matrices and contract selection tools. By integrating global best practices, the framework enhances project bankability, reduces disputes, and improves resilience.

The paper advances project management scholarship by linking contract governance with sustainable energy transitions and provides actionable guidance for policymakers, project managers, and investors.

**Keywords:** FIDIC, renewable energy, public-private partnerships, risk allocation, contract models, project governance, sustainability

### 1. Introduction

The transition to renewable energy (RE) has become a defining feature of the global low-carbon development agenda. Nations across the world are actively pursuing ambitious renewable energy targets to mitigate climate change, reduce dependence on fossil fuels, and achieve sustainable economic growth. Solar, wind, hydro, and biomass energy projects are now being integrated into national grids at a scale unprecedented in human history. However, this transformation requires extraordinary levels of investment in infrastructure, estimated by the International Energy Agency at more than USD 2 trillion annually until 2030. The financial burden of this energy transition is beyond the capacity of most governments to shoulder alone, especially in emerging and developing economies. Similarly, the private sector, despite its access to capital and innovation, often hesitates to undertake such projects in isolation due to risks associated with policy uncertainty, long payback periods, and volatility in energy markets.

Against this backdrop, Public-Private Partnerships (PPPs) have emerged as a strategic model for delivering renewable energy projects. PPPs combine the financial strength and governance authority of the public sector with the efficiency, technical expertise, and innovative capacity of private entities (Akomea-Frimpong, 2024) <sup>[1]</sup>.

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Unlike conventional procurement models, PPPs enable risk-sharing arrangements and create a framework where both partners are incentivized to ensure project success (Mazher, 2025) <sup>[11]</sup>. In the renewable energy sector, PPPs are particularly relevant due to the multi-dimensional risks involved, ranging from technology and construction challenges to policy, environmental, and demand-related uncertainties. The ability to design and manage appropriate risk allocation mechanisms within PPPs has therefore become a critical success factor for renewable energy projects. However, evidence from practice indicates that many renewable energy PPPs continue to suffer from poorly designed contractual frameworks and misallocated risks (Casady, 2024) <sup>[2]</sup>. In some cases, governments have retained risks that they are ill-equipped to manage, such as construction delays or technology performance, leading to cost overruns and disputes. In other cases, private partners have been burdened with risks related to policy or currency fluctuations, resulting in withdrawal from projects or renegotiation of contracts (Kim, 2011) <sup>[8]</sup>. These issues undermine the bankability of renewable energy projects, discourage private investment, and ultimately delay the achievement of clean energy targets. The challenge, therefore, lies in identifying effective models of contract design and risk allocation that can balance the interests of stakeholders while ensuring project sustainability.

This research seeks to address this gap by critically examining risk allocation and contract models in renewable energy PPPs. Drawing upon comparative case studies from India, Australia, and Africa, the study explores how different contexts influence contractual choices and risk-sharing arrangements. India's solar park projects provide insights into land acquisition and tariff risks; Australia's renewable energy zones illustrate the complexities of transmission and grid integration; and Africa's experiences, particularly Kenya's Lake Turkana Wind Project and South Africa's Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), highlight the significance of transparent procurement processes, government guarantees, and donor involvement (REIPPPP, 2023 <sup>[13]</sup>; DMRE, Republic of South Africa, 2025) <sup>[3]</sup>. Together, these cases form a rich empirical foundation for assessing how PPPs can be structured more effectively to deliver renewable energy infrastructure.

The objectives of this paper are threefold. First, it seeks to analyze the types of risks commonly encountered in renewable energy PPPs and the principles underlying their allocation. Second, it evaluates the strengths and limitations of different contract models, including Build-Operate-Transfer (BOT), Build-Own-Operate-Transfer (BOOT), Design-Build-Finance-Operate (DBFO), and FIDIC-based Engineering, Procurement, and Construction (EPC) frameworks. Third, it proposes a structured risk allocation framework tailored to renewable energy projects, offering practical tools such as risk matrices and model selection guidelines that can be applied by policymakers, financiers, and project managers.

The contribution of this study is twofold. From an academic perspective, it bridges the domains of project management, contract theory, and renewable energy policy, addressing a critical gap in the literature on PPP governance. From a practical standpoint, it offers actionable recommendations for governments and private investors seeking to enhance the bankability and resilience of renewable energy projects.

By situating the discussion within the context of global energy transitions, this paper also emphasizes that effective risk allocation is not merely a contractual or managerial concern but a strategic enabler of sustainable development. In summary, this introduction sets the stage for a detailed examination of how PPPs can be leveraged to overcome financing and operational challenges in renewable energy projects. By analyzing international experiences and synthesizing best practices, the paper aims to provide a framework for more equitable and efficient risk-sharing, thereby strengthening the role of PPPs as a cornerstone of the global renewable energy transition.

## 2. Literature Review

The literature on Public-Private Partnerships (PPPs) has expanded significantly over the past three decades, reflecting their growing use as an institutional mechanism for infrastructure delivery. The theoretical foundations of PPPs are often situated within transaction cost economics and agency theory. Transaction cost economics highlights the efficiency gains of PPPs by reducing information asymmetries and aligning incentives between stakeholders (Williamson, 1985) <sup>[14]</sup>. Agency theory further explains the contractual dynamics of PPPs, emphasizing mechanisms that mitigate opportunism and moral hazard in long-term partnerships. In the context of renewable energy, these theories provide a useful lens for understanding how risks are distributed, monitored, and mitigated across public and private actors.

A substantial body of literature has classified risks in PPPs into several categories, including political and regulatory risks, construction and technology risks, operational risks, demand risks, and financial risks (Grimsey and Lewis, 2002; Yescombe, 2011) <sup>[7, 5]</sup>. Political and regulatory risks include policy reversals, changes in tariffs, and permitting delays, which are particularly relevant in renewable energy projects due to evolving regulatory environments. Construction risks relate to cost overruns, delays, and design flaws, while technology risks include the underperformance or failure of renewable energy technologies such as solar PV panels or wind turbines. Demand risk reflects uncertainties in energy off take or grid absorption, while financial risks involve interest rate fluctuations, currency volatility, and availability of long-term financing. Scholars consistently emphasize that risks should be allocated to the party best positioned to manage them, as misallocation can undermine project viability (Kwak *et al.*, 2009) <sup>[10]</sup>.

Contract models form the backbone of PPP governance, and the literature identifies a wide range of contractual frameworks. The Build-Operate-Transfer (BOT) model is widely applied in energy infrastructure, allowing private entities to design, finance, and operate projects for a concession period before transferring them back to the public sector. Variants such as Build-Own-Operate-Transfer (BOOT) and Design-Build-Finance-Operate (DBFO) have been increasingly used to align ownership and operational responsibilities with financing structures. More recently, the use of FIDIC-based Engineering, Procurement, and Construction (EPC) contracts has been explored in renewable energy PPPs, particularly for risk allocation between developers and contractors. Comparative studies reveal that while BOT and BOOT models are suitable for large-scale generation projects, DBFO contracts have been more effective in distributed and modular renewable energy

systems, such as solar parks and microgrids (Kuang *et al.*, 2016) <sup>[9]</sup>.

Research on renewable energy PPPs specifically has grown in recent years, but significant gaps remain. Studies from Asia highlight the role of government guarantees and tariff-setting mechanisms in facilitating bankable renewable projects (Ghosh and Ranjan, 2019) <sup>[6]</sup>. In Africa, empirical work emphasizes the importance of donor involvement and credit enhancement mechanisms in reducing financing risks (Eberhard and Naude, 2017) <sup>[5]</sup>. Meanwhile, Australia and Europe provide evidence that robust regulatory frameworks and transparent procurement processes are essential for sustaining private sector confidence. Despite these contributions, the literature is fragmented, with most studies focusing on either financial structuring or regulatory frameworks, while relatively few address the intersection of risk allocation and contract model selection in renewable energy PPPs.

Moreover, renewable energy projects possess unique characteristics compared to conventional infrastructure. The intermittency of renewable energy resources, rapid technological evolution, and increasing integration into complex grid systems create risks that traditional PPP frameworks do not fully address. For instance, while construction risks in conventional projects are often well understood, the integration of large-scale renewable generation into national grids introduces new operational and demand risks that remain underexplored in PPP scholarship. Similarly, contract models adapted from transport or water PPPs may not adequately capture the distinct investment horizons, tariff uncertainties, and performance guarantees required in renewable energy.

The review therefore identifies three key research gaps. First, there is a need for sector-specific frameworks that align risk allocation principles with the technological and regulatory realities of renewable energy projects. Second, comparative analyses across different geographies remain limited, with most studies focusing on single-country contexts. Third, practical tools that link contract model selection with risk typologies in renewable energy PPPs are underdeveloped, leaving policymakers and project managers with limited guidance for structuring bankable and resilient projects.

In conclusion, the literature establishes PPPs as a critical instrument for renewable energy infrastructure delivery but highlights the importance of tailored risk allocation and contract design. Building on these insights, this paper seeks to bridge theoretical and practical perspectives by examining case studies across diverse contexts and proposing a structured risk allocation framework for renewable energy PPPs.

### 3. Methodology

This research adopts a comparative case study methodology to analyze risk allocation and contract models in renewable energy PPPs. The case study approach is particularly suited to this inquiry because PPPs are context-sensitive institutional arrangements whose performance is shaped by national regulatory frameworks, political environments, and technological choices. Rather than testing a single hypothesis across a large dataset, the comparative method enables a nuanced examination of how PPP design principles operate in different geographical and institutional contexts. By comparing India, Australia, and Africa (with a

focus on Kenya and South Africa), the study captures a spectrum of policy, financial, and technical conditions that influence PPP outcomes in renewable energy projects.

#### 3.1 Case Selection

The selection of India, Australia, and Africa was guided by theoretical and practical considerations. India represents an emerging economy with ambitious renewable energy targets (450 GW by 2030) and extensive experience with PPPs in solar and wind projects, including the National Solar Park Scheme. Australia exemplifies a developed economy with sophisticated regulatory frameworks, large-scale renewable energy zones, and established PPP practices across infrastructure sectors. Africa provides insights from developing contexts where institutional capacity, donor involvement, and credit enhancement mechanisms play critical roles. Within Africa, Kenya's Lake Turkana Wind Power Project and South Africa's Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) are chosen due to their global recognition as pioneering renewable PPPs. Together, these cases illustrate variations in regulatory maturity, financing structures, and risk allocation practices.

#### 3.2 Data Sources

Data for the study were drawn from multiple sources to enhance reliability and validity. Primary sources include official project documents, procurement guidelines, government policy reports, and contractual frameworks (e.g., concession agreements, power purchase agreements, and EPC contracts). Secondary sources consist of peer-reviewed journal articles, international agency reports (e.g., World Bank, IEA, IRENA), and practitioner-oriented literature from institutions such as the Asian Development Bank (ADB) and African Development Bank (AfDB). Triangulation of sources allows for cross-validation of findings and mitigates the limitations associated with reliance on any single dataset.

#### 3.3 Analytical Framework

The analytical framework integrates risk typologies with contract model evaluation. Risks are categorized into political/regulatory, construction/technology, operational, demand, and financial risks, following established PPP literature. Each case is examined in terms of how these risks were allocated between public and private partners and how contractual frameworks (BOT, BOOT, DBFO, or FIDIC-based EPC) were structured to manage them. In addition, the study applies a risk allocation matrix, mapping risks against responsible parties and mitigation mechanisms (1). Contract models are evaluated on criteria such as clarity of roles, flexibility in addressing uncertainties, and ability to enhance project bankability. Comparative analysis is conducted to identify commonalities and divergences across cases, with attention to contextual drivers such as regulatory maturity, market conditions, and institutional capacity.

#### 3.4 Limitations

While the comparative case study approach provides rich qualitative insights, it is not without limitations. First, the reliance on publicly available documents may exclude confidential contractual details that could offer deeper insights into negotiation dynamics. Second, the selected cases, while illustrative, are not exhaustive of all renewable



energy PPP experiences worldwide. For example, Europe's offshore wind PPPs or Latin America's hydroelectric projects could provide additional perspectives. Third, the study emphasizes contract models and risk allocation but does not fully capture broader socio-environmental impacts of renewable energy PPPs, such as community engagement or land-use conflicts. Finally, case comparisons are inherently influenced by contextual heterogeneity; caution must therefore be exercised in generalizing findings across different regions.

Despite these limitations, the methodology offers a robust platform for analyzing the interplay between risk allocation and contract models in renewable energy PPPs. By combining theory-driven risk typologies with comparative case evidence, the study contributes both to academic understanding and to the development of practical frameworks for structuring future renewable energy PPPs.

## 4. Case Study Analysis

### 4.1 India

India has emerged as one of the fastest-growing renewable energy markets, with over 170 GW of installed renewable capacity by 2023 and a target of 450 GW by 2030. The government has actively leveraged PPP frameworks, particularly through the National Solar Park Scheme, which provides land and transmission infrastructure while private developers build, own, and operate generation assets under long-term Power Purchase Agreements (PPAs). In solar and wind PPPs, key risks such as land acquisition and grid connectivity are assumed by public agencies, while construction and operational risks are transferred to private developers. Tariff determination through competitive bidding has improved transparency but has also created financial stress due to aggressive price competition. Notable examples include the Rewa Ultra Mega Solar Project (750 MW), structured as a DBFO concession with risk-sharing mechanisms, and wind energy PPPs in Tamil Nadu and Gujarat. While India's model has attracted substantial private investment, challenges persist in tariff renegotiations and payment delays by state utilities, illustrating the delicate balance of risk allocation in emerging markets.

### 4.2 Australia

Australia's renewable energy transition has been marked by its pioneering of Renewable Energy Zones (REZs) and associated transmission PPPs. Unlike India, where the public sector shoulders land and transmission responsibilities, Australia's PPPs emphasize network infrastructure delivery. Projects such as the New South Wales REZ initiative and Victoria's transmission upgrades have applied DBFO models, where private consortia design, finance, and operate transmission assets under regulated returns. Risk allocation is relatively stable due to Australia's robust legal system and regulatory clarity, with policy and demand risks largely mitigated through long-term contracts and government-backed frameworks. Construction risks are borne by private contractors under FIDIC-based EPC agreements, while the public sector retains responsibility for system-level integration and policy stability. Australia's case highlights how PPPs can be tailored to address grid bottlenecks in mature energy markets, ensuring that renewable capacity additions are not constrained by transmission limitations.

### 4.3 Africa

In Africa, renewable energy PPPs face unique challenges due to weaker institutional capacity, higher perceived investment risks, and limited access to affordable capital. Nevertheless, innovative PPP models have demonstrated success. Kenya's Lake Turkana Wind Power Project (310 MW), the largest wind farm in Africa, involved a BOT concession with extensive risk mitigation, including government guarantees on off take and donor-backed financing from the African Development Bank. Despite initial delays in transmission line completion, the project illustrates the importance of sovereign support in de-risking large-scale investments. In South Africa, the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) has become a benchmark for transparent and competitive renewable energy PPPs. By combining standardized contracts, clear procurement rounds, and credit enhancement mechanisms, REIPPPP has mobilized over USD 20 billion in private investment. Risks are allocated through long-term PPAs with Eskom, where developers assume construction and operational risks, while the government mitigates policy and offtake risks. South Africa's model demonstrates how regulatory clarity and competitive bidding can attract sustained private participation in renewable energy markets.

### 4.4 Comparative Synthesis

Comparing these cases reveals both convergence and divergence in PPP risk allocation. India and South Africa emphasize competitive bidding to attract private participation, while Kenya relies more on government guarantees and donor-backed financing. Australia's experience shows that in mature markets, PPPs are increasingly focused on transmission and system integration, whereas in developing contexts the priority remains generation capacity. Across all cases, construction and technology risks are consistently allocated to private partners, while public entities retain responsibility for policy and systemic risks. The analysis also suggests that contractual flexibility whether through DBFO in Australia, BOT/BOOT in Africa, or hybrid models in India is crucial for adapting to evolving market and policy conditions. However, recurring challenges such as tariff renegotiations in India, transmission delays in Kenya, and policy uncertainty in South Africa highlight the persistent need for structured, context-specific risk allocation frameworks.

In summary, the comparative analysis underscores that there is no universal PPP model for renewable energy. Instead, success depends on aligning risk-sharing mechanisms with the institutional maturity, financing environment, and technological context of each country.

## 5. Discussion

The comparative analysis of India, Australia, and Africa highlights that while renewable energy PPPs are context-dependent, several cross-cutting insights emerge regarding optimal risk allocation. First, the principle of allocating risks to the party best able to manage those remains valid, yet its operationalization is uneven across geographies. Construction and technology risks are most effectively transferred to private developers and EPC contractors, who possess the technical expertise and operational control. However, political, regulatory, and off take risks are better retained or shared by the public sector, as private actors lack

the capacity to mitigate them. Misalignment in this distribution as seen in India's tariff renegotiations and Kenya's transmission delays undermines bankability and increases the likelihood of disputes.

Second, the role of contract models is central in shaping how risks are allocated, shared, and mitigated. BOT and BOOT models have proven effective in contexts where governments can provide sovereign guarantees, donor support, or stable off take arrangements, as demonstrated in Kenya and South Africa. DBFO models, by contrast, are particularly suited to transmission and system integration projects in mature markets such as Australia, where private consortia can be assured of regulated returns. FIDIC-based EPC contracts, often embedded within PPP frameworks, provide standardized mechanisms for allocating design and construction risks, thereby enhancing predictability and reducing transaction costs. The choice of contract model therefore must be tailored not only to the project type (generation versus transmission) but also to the maturity of the host country's regulatory and financial systems.

Third, the findings underscore the importance of contractual flexibility. Renewable energy projects are subject to uncertainties arising from technological evolution, fluctuating demand, and policy transitions. Rigid contracts that fail to anticipate such uncertainties can become sources of conflict. For instance, India's aggressive tariff bidding under fixed PPAs has resulted in financial strain when market conditions shifted. By contrast, South Africa's standardized but adaptive procurement under REIPPPP shows that flexibility can be embedded without sacrificing transparency (Eberhard, 2014) <sup>[4]</sup>. Adaptive contractual provisions such as tariff adjustment clauses, dispute resolution mechanisms, and performance-linked incentives enhance resilience in long-term partnerships.

From a managerial perspective, the evidence emphasizes the need for project managers and contract administrators to act not merely as implementers of contractual obligations but as mediators of risk-sharing arrangements. Effective PPP management requires skills in contract negotiation, risk assessment, and stakeholder engagement. Managers must balance technical performance with financial sustainability, ensuring that risks are continually monitored and, where necessary, renegotiated to preserve project viability. Furthermore, international experience suggests that successful PPPs often rely on institutional capacity building, particularly in public agencies. Training procurement officials, standardizing contract templates, and strengthening regulatory oversight reduce uncertainty and foster greater private sector confidence.

Finally, the discussion highlights the strategic role of risk allocation in enabling renewable energy transitions. Risk-sharing mechanisms are not purely contractual details; they are enablers of broader policy objectives, including climate commitments, energy security, and sustainable development. Governments that design clear and credible PPP frameworks send powerful signals to investors, while private actors that adopt long-term perspectives rather than short-term profit maximization contribute to resilience. Optimal risk allocation, therefore, is both a managerial practice and a strategic imperative for scaling up renewable energy globally.

In conclusion, the findings suggest that no single PPP model guarantees success. Instead, adaptive, context-specific approaches to risk allocation and contract design-grounded

in international best practices but sensitive to local realities offer the most promising pathway for ensuring the bankability, sustainability, and resilience of renewable energy PPPs.

## 6. Proposed Framework for Risk Allocation

Building on the comparative analysis of India, Australia, and Africa, this section proposes a structured framework for risk allocation in renewable energy PPPs, designed to serve as a practical guide for policymakers, financiers, and project managers. The framework integrates a risk allocation matrix with a contract model selection guide, underpinned by global best practices in PPP governance.

### 6.1 Risk Allocation Matrix

The core of the framework is a risk allocation matrix that maps major categories of risks-political/regulatory, construction/technology, operational, demand, and financial-against the public and private partners. The principle is to allocate each risk to the stakeholder best positioned to manage it, while ensuring sufficient safeguards to maintain project bankability. For example:

- Political and regulatory risks (e.g., tariff revisions, permitting delays) should be retained or shared by the public sector, as private actors cannot directly mitigate these uncertainties. Sovereign guarantees or stabilization clauses are recommended.
- Construction and technology risks should be transferred to private developers and EPC contractors, incentivizing innovation, timely delivery, and quality assurance.
- Operational risks (e.g., plant performance, maintenance costs) are best managed by private partners through performance-linked contracts, though government monitoring mechanisms remain essential.
- Demand/offtake risks require hybrid solutions: in emerging markets, public entities should guarantee offtake through PPAs, while in mature markets with liberalized energy systems, risks can be shared via capacity payments or market-based adjustments.
- Financial risks (currency volatility, interest rate shifts) often necessitate shared mechanisms, such as government-backed hedging instruments, multilateral credit enhancements, or blended finance structures.

This matrix allows risks to be explicitly identified, allocated, and mitigated, reducing ambiguity and providing a structured foundation for negotiation.

### 6.2 Contract Model Selection Guide

The second component of the framework is a contract model selection guide, linking project characteristics with appropriate PPP models:

- BOT/BOOT models are most suitable for large-scale generation projects in developing contexts where sovereign support and donor involvement can stabilize offtake and financing risks.
- DBFO models are preferable for transmission and grid integration projects, especially in mature markets, as they align financing with regulated returns and ensure long-term operational efficiency.
- FIDIC-based EPC contracts serve as effective sub-frameworks within PPPs for allocating construction and technology risks, particularly in contexts where

standardization and dispute resolution mechanisms are critical.

- Hybrid models that combine BOT/BOOT with EPC subcontracts or embed flexibility clauses can be adapted for rapidly evolving renewable technologies, such as offshore wind or battery storage.

This selection guide ensures that the choice of contract model is not generic but aligned with the technical, financial, and regulatory attributes of each project.

### 6.3 Integration with Best Practices

To operationalize the framework, the study recommends embedding best practices observed across international experiences:

- **Standardization:** Use of standardized contract templates and procurement processes, as demonstrated by South Africa's REIPPPP, enhances transparency and investor confidence.
- **Flexibility:** Embedding adaptive clauses (e.g., tariff adjustment, renegotiation protocols) ensures resilience in dynamic policy and market environments.
- **Institutional capacity:** Building the skills of public officials in procurement, contract management, and risk assessment is essential to enforce accountability and reduce opportunism.
- **Credit enhancement:** Instruments such as government guarantees, donor-backed financing, and multilateral support mitigate financial risks and attract private capital in high-risk markets.
- **Stakeholder engagement:** Early consultation with communities and investors minimizes social and reputational risks, which often derail renewable energy projects.

Together, these practices transform the risk allocation matrix and contract model selection guide into a holistic governance framework for renewable energy PPPs.

### 6.4 Practical Utility

From a managerial standpoint, the framework offers a decision-support tool for contract administrators and project managers. It enables systematic risk assessment, provides clarity in negotiations, and ensures alignment between project design and institutional realities. From a policy perspective, it supports governments in balancing private sector incentives with public accountability, thereby enhancing both bankability and sustainability.

In summary, the proposed framework moves beyond generic PPP theory to deliver a context-sensitive, actionable model for structuring renewable energy PPPs. By combining explicit risk allocation, contract model guidance, and international best practices, it provides a practical roadmap for accelerating the global renewable energy transition through well-designed partnerships.

## 7. Conclusion and Managerial Implications

This study has examined the critical issue of risk allocation and contract models in renewable energy Public-Private Partnerships (PPPs) through a comparative analysis of India, Australia, and Africa. The findings confirm that while PPPs remain a powerful mechanism for mobilizing private capital and expertise, their success hinges on the ability of stakeholders to design context-specific risk-sharing

frameworks. There is no single "one-size-fits-all" model; instead, effective PPPs require alignment between project type, institutional maturity, and the capabilities of public and private partners.

From a theoretical perspective, the research reinforces the enduring validity of the principle that risks should be allocated to the party best positioned to manage them. In practice, however, misallocation persists: tariff renegotiations in India, transmission delays in Kenya, and policy uncertainty in South Africa illustrate how poor design can undermine project bankability. Conversely, structured approaches such as South Africa's REIPPPP and Australia's DBFO-based transmission PPPs demonstrate how transparent procurement and standardized contracts can foster sustained investor confidence.

Three broad recommendations emerge from the analysis. First, governments should assume or share systemic risks—particularly political, regulatory, and off take risks—that private developers cannot realistically mitigate. Mechanisms such as sovereign guarantees, stabilization clauses, and donor-backed financing can de-risk projects without creating excessive fiscal exposure. Second, private developers should bear construction, technology, and operational risks, with performance obligations embedded in contracts through EPC frameworks and long-term PPAs. Third, hybrid approaches that combine BOT/BOOT concessions with adaptive contractual provisions offer a pathway for managing uncertainties in dynamic markets, particularly where renewable technologies and policy regimes are rapidly evolving.

The managerial implications are equally significant. For project managers and contract administrators, the evidence highlights the importance of adopting a proactive role in risk governance. Beyond compliance with contractual terms, managers must act as mediators between public and private stakeholders, ensuring that risks are continually assessed, documented, and, where necessary, renegotiated. Skills in risk analysis, stakeholder management, and adaptive contracting are thus becoming as essential as technical expertise in renewable energy project delivery.

For policymakers, the key lesson is that PPP frameworks must combine standardization with flexibility. Standardized templates, as seen in REIPPPP, reduce transaction costs and enhance transparency. At the same time, flexibility in tariff structures, dispute resolution, and renegotiation protocols ensures resilience in long-term partnerships. Building institutional capacity is central to this balance: procurement officials and regulators must be equipped with the knowledge and tools to enforce contracts effectively while maintaining space for adaptation.

For investors and financiers, the study underscores that renewable energy PPPs are bankable when contractual clarity and sovereign support are present. Access to credit enhancement mechanisms, multilateral guarantees, and transparent procurement reduces financing costs and attracts a broader pool of private capital. The implication is that investors should engage not only in financial due diligence but also in assessing the robustness of risk allocation frameworks before committing resources.

Finally, for the broader renewable energy transition, the strategic significance of risk allocation cannot be overstated. Well-structured PPPs are not merely financing instruments; they are enablers of climate commitments, energy security, and sustainable development. Poorly designed PPPs risk



delaying transitions, eroding trust, and creating financial liabilities, while well-designed ones can accelerate innovation, reduce costs, and deliver lasting socio-economic benefits.

In conclusion, this study provides both analytical insights and practical guidance on structuring renewable energy PPPs. By integrating a risk allocation matrix, a contract model selection guide, and best practices from international experience, the proposed framework offers a roadmap for governments, managers, and investors seeking to strengthen the bankability and resilience of renewable energy projects. As the global energy transition accelerates, the ability to design adaptive, equitable, and context-sensitive PPPs will be central to achieving low-carbon development goals.

## 8. Future Research Directions

While this study provides a comprehensive analysis of risk allocation and contract models in renewable energy Public-Private Partnerships (PPPs), several areas remain ripe for further research. The complexity of renewable energy PPPs, coupled with the dynamic nature of energy markets and technology, suggests that continuous scholarly inquiry is essential to advance both theory and practice.

### 8.1 Empirical validation of risk allocation frameworks

One of the primary avenues for future research is the empirical validation of proposed risk allocation frameworks. While this study presents a structured risk matrix and contract model selection guide based on comparative case studies, large-scale empirical testing across multiple countries and project types can enhance its robustness. Quantitative studies using panel data on project performance, delays, cost overruns, and dispute frequency could be employed to statistically assess the effectiveness of different risk allocation strategies. Such validation would also allow for identification of correlations between risk allocation patterns and project outcomes, providing stronger evidence for policy prescriptions and managerial decision-making.

### 8.2 Integration of emerging renewable energy technologies

Renewable energy technologies are rapidly evolving, and future research must explore how PPP frameworks adapt to emerging technologies. Innovations such as offshore wind, floating solar, grid-scale battery storage, and green hydrogen introduce unique technical, financial, and operational risks that traditional PPP models may not adequately address. For example, intermittency, modular scaling, and novel engineering challenges may require hybrid or adaptive contracting mechanisms, alongside revised risk allocation practices. Comparative analyses of PPPs incorporating these technologies could generate insights on tailoring contractual and governance structures to novel technological contexts, ensuring both feasibility and bankability.

### 8.3 Digital and Smart Governance Tools in PPPs

The digitalization of project governance offers another important research frontier. Tools such as digital dashboards, block chain-based contract tracking, and AI-enabled risk monitoring systems have the potential to enhance transparency, accountability, and responsiveness in PPPs. Future studies could investigate how integrating such

tools affects risk identification, mitigation, and performance management in renewable energy projects. In particular, the role of predictive analytics for early detection of construction delays, performance deviations, or financial stress could transform traditional PPP management, reducing transaction costs and dispute frequency.

### 8.4 Cross-Country and multi-sector comparative studies

While this study focused on India, Australia, and Africa, additional research could adopt cross-country and multi-sector comparative approaches. Examining renewable energy PPPs alongside infrastructure PPPs in transport, water, and urban services may reveal transferable lessons and sector-specific constraints. Similarly, comparisons between developed, emerging, and low-income countries can illuminate the influence of institutional capacity, policy maturity, and financial market depth on contract design and risk allocation. Such comparative work would strengthen the external validity of theoretical frameworks and provide richer guidance for global policymakers and investors.

### 8.5 Socio-environmental and stakeholder considerations

Future research should also explore socio-environmental and community impacts within renewable energy PPPs. While this study primarily addressed financial, technical, and regulatory risks, social license to operate, land-use conflicts, and community engagement are increasingly recognized as critical determinants of project success. Empirical studies integrating social impact assessments and stakeholder perspectives could provide comprehensive frameworks that combine technical, financial, and social dimensions of risk, thereby enhancing project sustainability and public acceptance.

### 8.6 Longitudinal studies and post-implementation learning

Finally, there is a need for longitudinal studies that track renewable energy PPPs throughout their life cycle—from planning and construction to operation and handover. Such studies could assess how risk allocation evolves over time, how contractual clauses are enforced or renegotiated, and how project outcomes compare against initial projections. Insights from post-implementation learning can inform adaptive contract design, identify recurring challenges, and generate guidelines for continuous improvement in renewable energy PPP governance.

In summary, future research directions point to the need for empirical testing, technological adaptation, digital integration, cross-sector comparison, socio-environmental inclusion, and longitudinal evaluation. Addressing these gaps will not only strengthen academic understanding of renewable energy PPPs but also provide practical tools for governments, project managers, and investors seeking to scale up sustainable energy infrastructure in a complex, uncertain, and rapidly evolving global environment.

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