**ANGELENO GROUP, LLC**

33 Nickson Street

Surry Hills NSW 2010

19 November 2013

By Email: [*AERInquiry@aer.gov.au*](mailto:AERInquiry@aer.gov.au)

Attention: Jacqui Thorpe, Acting General Manager, Retail Markets Branch

Dear Jacqui

**Submission on the Alternative Energy Sellers – Issues Paper**

Angeleno Group is setting up in a Australia a business to focus on providing solar equipment free to customers under a power purchase agreement structure, similar to those in the US and as discussed in the issues paper as a Solar Power Purchase Agreement (SPPA).

Angeleno Group found the paper very clear and helpful – it was well drafted – and we are supportive of the proposals in the paper. Our specific comments are following this letter.

If AER does hold a public forum on this matter, Angeleno Group would like to be involved. We are based in Sydney so may join by video link.

Please don’t hesitate to contact us if you would like to discuss our submission further.

Yours sincerely

David Jones

Managing Director

Angeleno Group’s working title for the business is the Australian Clean Energy Finance Fund (ACEFF) – hence ACEFF is used in these comments.

ACEFF is developing a solar power purchase agreement (SPPA) business, and as such these comments relate to SPPA business models.

ACEFF believes the proposed approach to SPPAs is logical. ACEFF believes SPPA’s structured as a supplemental energy provider to the customer make sense, when combined with a customer’s authorised retailer who continues to provide an essential energy service 24/7/365, and where the customer can change that authorised retailer as they see fit, unrestricted by the SPPA.

ACEFF believes the proposed approach of having the supplemental SPPA provider, as described above, be individually exempted from the Retail Law, is logical, again, when complemented with a customer having an authorised retailer. ACEFF concurs that given the many variations in SPPA business models, and the lack of operating history of many of these models, that individual exemptions are more appropriate than class exemptions.

ACEFF believes AER must be open to granting multisite individual exemptions, as mooted at the bottom of page 16 in the issues paper. ACEFF’s SPPA business model expects to attract thousands of customers, and across a number of segments such as residential, commercial and government. As such we think the AER should be open to multisite individual exemptions across multiple classes of customers, as listed at the top of page 17.

ACEFF believes the proposed approach of imposing a series of obligations and requirements on an individually exempted supplemental provider such as an SPPA provider described above makes sense, in addition to the existing full suite of obligations provided by the customer’s authorised retailer. In these circumstances, the application of conditions as part of the individual exemption as suggested on page 17 is appropriate in ACEFF’s view.

END