



**Retail Authorisation Application to the
Australian Energy Regulator
August 2020**

1. Contents

2. Introduction	4
About Green Energy Experts	4
3. Required information – General Particulars	5
Legal Name of Applicant	5
Trading Name.....	5
Australian Company Number	5
Registered business address.....	5
Postal address.....	5
Nominated contact.....	5
Form of energy sought	5
State intended to retail in:.....	5
Intention to commence activities	5
Nature and Scope of Operations	5
Type of customers intended to supply	6
Attachments.....	6
4. Required Information - Organisational and technical capacity	7
Details of previous experience as an authorised/licensed energy retailer.....	7
Where you do not have previous energy market experience, how you intend to bring this experience into your business	7
Organisational Chart.....	8
The number of employees, broken down by business unit or other relevant classification	9
A summary of qualifications, technical skills and experience of your officers, and the relevance of those skills and experience to meeting the requirements of the retailer authorisation.....	9
Third party providers of service	11
A business plan, including but not limited to, strategic direction and objective, forecast results and detailed assumptions on how you calculated these forecasts	12
Details of your compliance strategy	12
A copy of your risk management strategy covering both operational and financial risks	13
Details of any agreements and systems in place to facilitate interaction with relevant market participants including AEMO, distribution businesses, jurisdictional or technical regulators, government departments and market participants. Including steps taken to become a member of the Energy Ombudsman.	13

5. Required Information – Financial resources	13
Details and Evidence of your current financial position	13
A written declaration from your Chief Financial Officer, stating you are a going concern and that the officer is unaware of any factor that would impede your ability to finance your energy retailer activities under the retailer authorisation for the next 12 months.	13
A written declaration from an independent auditor or your principal financial institution stating that:	14
Forecast revenue and expenses to the point where your business is cash flow positive.	14
6. Required Information - Suitability.....	15
Details of any situation where a RoLR trigger has occurred or likely to occur	15
Offences or successful prosecutions	15
Upon request a criminal history check conducted within last 12 months.....	15
Statement from directors that are not disqualified from management of corporations .	15
Full name and current residential address of all officers of the applicant	16
Details of policies and procedures addressing the probity and competence of officers and any other key management staff.....	16
7. Appendix.....	17

2. Introduction

Green Energy Experts (GEE) are a successful Australian solar retailer with over 6MW of installations in the 2019 calendar year. Holding an exceptional record of customer satisfaction and high-quality installations, the next phase of growth sees GEE providing electricity and gas to accompany their solar offering.

To this end, Green Energy experts have created a new company, GEE Power & Gas, to provide retail energy services to their large database of customers.

About Green Energy Experts

Green Energy Experts (GEE) were formed by two directors, Sunit Kumar and Sumit Dhall in 2017 with the purpose of providing installation services to the solar PV industry. Specialising solely in the commercial sector (10-100kW), GEE's quality of work, attention to detail and safety performance quickly attracted a number of blue-chip clients like Origin Energy and Beacon Lighting (who required outsourced installation capability).

Green Energy Experts established offices in South Australia and Victoria in 2018, and targeted small to medium businesses who sought relief from high electricity bills and who valued great service and a quality solar solution.

On the back of strong relationships with suppliers, partners and customers, Green Energy Experts installed over 6MW of commercial solar in the last 12 months (making them one of Australia's fastest growing commercial solar providers) and amassed a database of approximately 4000 SME customers. The team has expanded to over 70 employees with expansion planned across Australia in 2020.

Green Energy Experts are planning to apply their "customer first" philosophy to energy retailing through GEE Power & Gas, providing electricity and gas to their existing customer database using the parent company's successful acquisition channels. This growth will be undertaken in a modest and responsible manner, with the same dedication and care that has seen Green Energy Experts become a leader in the Australian renewable energy market.

3. Required information – General Particulars

Legal Name of Applicant

GEE Power & Gas Pty Ltd

Trading Name

GEE Power & Gas

Australian Business Number

42 636 908 220

Registered business address

2, 380 Clayton Road, Clayton South, Vic, 3169

Postal address

As above

Nominated contact

Brett Harman – Consultant
Sonne Energy

Form of energy sought

Electricity

State intended to retail in:

Queensland

Intention to commence activities

GEE Power & Gas intends to start electricity acquisition activities by December 2020 and gas in June 2021, subject to receiving a retail electricity authorisation from the Australian Energy Regulator.

Nature and Scope of Operations

GEE Power & Gas have a significant database of solar customers located largely in Victoria and Queensland. As such, GEE Power & Gas will be pursuing opportunities mostly in these areas, with a view to modest growth into the SA and NSW markets in 2020. Green Energy Experts have had great success with solar PV in rural areas where customers value high

quality and good service and will seek to offer retail energy products to this customer segment.

It is important to note that Solar PV will remain the core product of GEE, with retail energy provided as an “add-on” to compliment solar and to provide customers with a “one stop shop”. Targets are therefore very modest and the business model totally scalable.

Type of customers intended to supply

With a focus upon Commercial Solar sales where the majority of clients are small to medium businesses, GEE Power & Gas will focus primarily on acquiring SME customers with a small number of large customers (C&I).

Attachments

The following attachments outline GEE and GEE Power & Gas incorporation information

- *Public attachment 14 - ASIC Extract_Gee Power & Gas*
- *Public attachment 15 - ASIC Extract_Green Energy*

Entry Criteria

4. Required Information - Organisational and technical capacity

Details of previous experience as an authorised/licensed energy retailer

GEE Power & Gas is a new entity and as such does not possess direct retailing experience. However, GEE does have key people in the team with extensive retail expertise with established national retailers. GEE Power & Gas have also engaged key people to supplement their skill base, which is outlined on page 9.

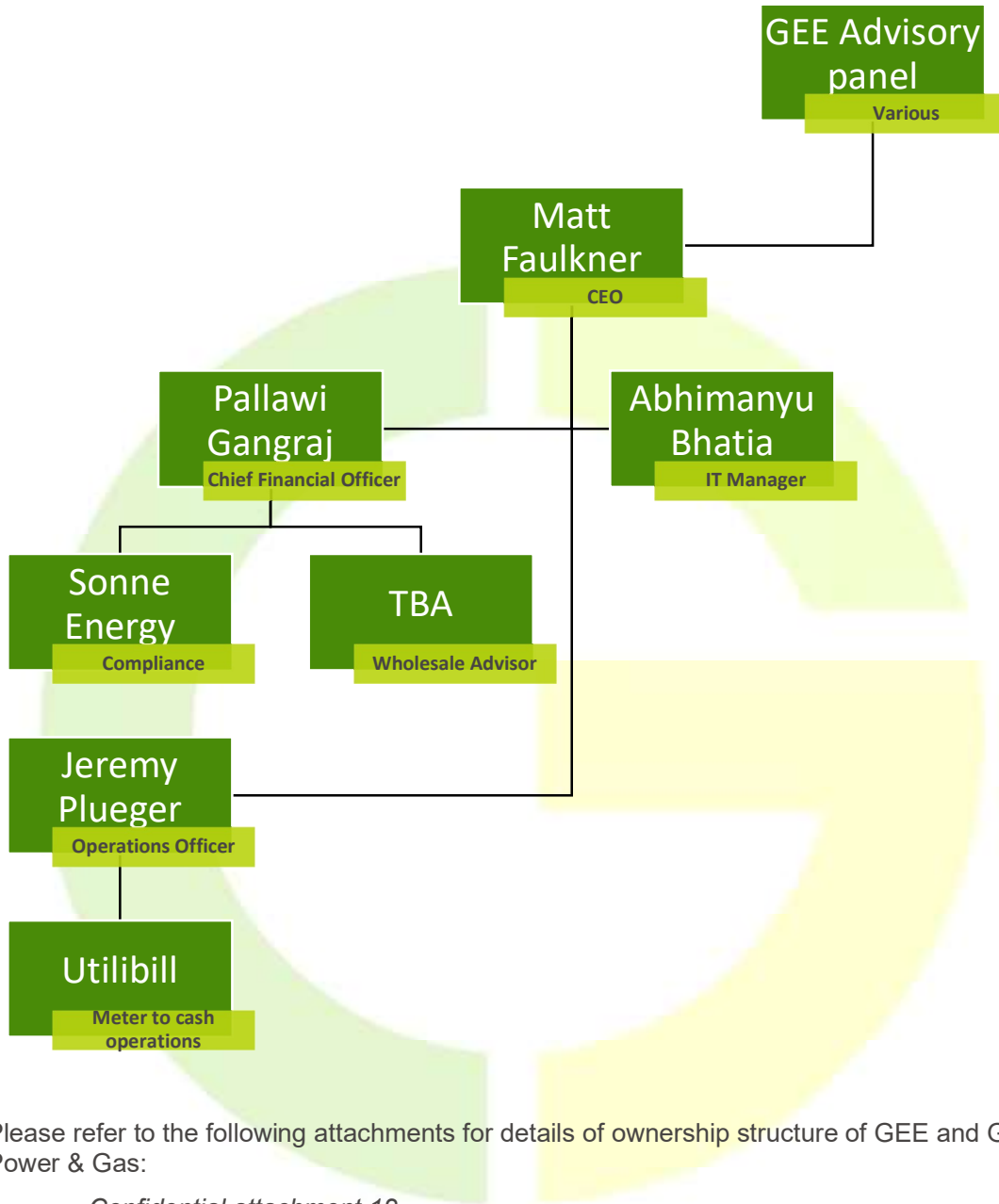
Where you do not have previous energy market experience, how you intend to bring this experience into your business

In addition to the details provided of officers with previous retailing experience, GEE Power & Gas is cognisant of the need to bring in additional resources with direct and relevant experience in energy retailing in Australia.

As such, GEE Power & Gas have engaged or is in the process of engaging:

- senior executives with expertise in the Australian energy market,
- a billing provider that is currently well established in the Australian market, and;
- trusted third parties with experience within the energy industry.

Organisational Chart



Please refer to the following attachments for details of ownership structure of GEE and GEE Power & Gas:

- Confidential attachment 12
- Confidential attachment 13
- Confidential attachment 16

The number of employees, broken down by business unit or other relevant classification

Business Unit	Permanent (ie internal) Employees
Management/Advisory	Three
General Staff	One

Note: these are internal resources only. Third parties will provide additional resourcing as discussed in the business case.

A summary of qualifications, technical skills and experience of your officers, and the relevance of those skills and experience to meeting the requirements of the retailer authorisation

GEE Power & Gas have a team of passionate, highly skilled and experienced professionals that bring the critical capability required to deliver requirements of the retail business plan as set out in confidential attachment 2.

Sunit Kumar Advisory Panel Member

Sunit is an experienced leader in the energy industry, with significant experience in both retail and solar energy spanning back to 2009, starting with Energy Australia and then Australian Power & Gas.

With a background in banking (6 years with the bank of America), Sunit decided to form his own business and founded Arya Corporates, providing installation services to the solar industry. With a focus on great service and technical compliance, the business quickly grew and attracted blue chip clients like Origin Energy and Beacon Lighting.

Partnering with Sumit Dhall to form Green Energy experts in 2017 and on the back of strong relationships with suppliers, partners and customers, Green Energy Experts installed in excess of 50MW of commercial solar (making it one of Australia's fastest growing commercial solar providers) to over 3,000 Australian businesses.

The team has expanded to around 70 employees with offices in SA, VIC, NSW and Dehli with further recruitment planned across Australia and internationally in 2020. With a proposed move into energy retail, Green Energy Experts re-branded to GEE Energy in 2019.

Sunit is currently a director of GEE Energy and uses his finance background to oversee the financial performance of the group. This includes managing M&A opportunities (both in Australia and overseas), procurement (more than \$12mil purchased last year) and capital raising.

Sumit Dhall Advisory Panel Member

Sumit is a dedicated professional working in the energy industry, with vast experience in both retail electricity and solar across numerous companies, including Energy Australia and Red Energy. Sumit started his career in energy sales and moved into a service/customer resolutions role, providing the perfect foundation and understanding of the front and back end of retailing electricity in Australia. Fast forward 11 years, and Sumit is currently a

director of GEE Energy, one of Australia's fastest growing commercial solar providers with over 50MW installed to more than 3,000 Australian businesses.

Before creating GEE Energy, Sumit started up a successful solar business under Anaya Enterprises, raising capital and growing the capability to deliver small and large-scale rooftop solar projects in the Victorian market. In 2017 he partnered with Sunit Kumar to deliver installation services to Origin Energy, becoming one of the nations' largest solar providers trusted installation partner.

Operating as Green Energy Experts, the duo applied become an energy retailer in 2019 and changed the business name to GEE Energy to reflect the product-agnostic energy solutions provider they aimed to become.

As a qualified accountant, Sumit has demonstrated the commercial acumen to create and grow a high performing, financially sustainable business. He has many years of experience in leading and developing teams- from small teams of four people to large divisions across many states and countries –and it is this ability to lead, motivate and drive performance in different industries that is his greatest strength. Working in both energy retail and solar businesses has given Sumit a deep understanding of the electricity network, which has provided him with a unique insight into the industry.

Matt Faulkner: Chief Executive Officer – Solar and Retail

Matt has had over 20 years of senior management experience in both unregulated and regulated organisations. Matt spent ten years at Origin Energy, working in a variety of roles encompassing Regulatory Compliance, Operations, Sales, Service and general management.

After heading up Origin's National Sales team, Matt built Origin's Business Energy & Solar Division- which under Matt's leadership quickly became the largest provider of solar and energy products in Australia. Providing both grid, gas, LPG and renewable energy, Matt was responsible for the oversight of a number of third-party channels and external service providers.

Matt has also worked with Network distribution businesses in a regulatory environment and headed up SAPN's newly created renewable energy division through its infrastructure arm, Enerven.

In this capacity, Matt was responsible for recruiting, training and driving a team to pursue large scale solar opportunities across the NEM. These projects included the EPC of solar farms and negotiating offtake agreements with retail partners. This culminated with the successful bid for Stage 1 SA Water Project Zero, resulting in a 90MW portfolio of sites across South Australia aimed at taking SA Water's net grid energy use to zero.

Matt then joined the Sonne Energy team, using his practical experience to help Sonne assist new entrants into the retail energy industry by providing compliance, wholesale, financial and management advisory services.

Roles and relevant skills in meeting the requirements of retail authorisation: Vast experience in Residential, SME and C&I energy retailing with Origin Energy. Experience in transmission and distribution with SAPN and has a deep understanding of the National Energy Market. Holds an MBA from the University of South Australia.

Pallawi Gangraj: Chief Financial Officer

Currently functioning as GEE's Chief Financial Officer, Pallawi has over 13 years' experience within a finance management environment. Pallawi received her MBA from RMIT in Melbourne in 2017. Before taking over the financial management at Green Energy Experts, Pallawi worked as an accountant for Sire Professional group from 2015-2018. Pallawi has undertaken forecasting and settlement training under Sonne Energy and will apply her deep financial management expertise to the retail operations of GEE Power & Gas.

Roles and relevant skills in meeting the requirements of retail authorisation: Current CA, MBA qualified. Currently heads up GEE's financial management across retail energy products.

Jeremy Plugger: Operations Support

Jeremy has spent the last 6 years within a retail energy environment having worked for Lumo Energy from 2013 - 2018. Jeremy has worked in the following roles – Customer Relations Advisor, Transfer/Back office specialist, Channel Administrator and Channel compliance. Jeremy is proficient with the use of retail energy billing engines and is experienced in working across the energy customer journey, from acquisition right through to managing customer exceptions when they seek to transfer out. Jeremy has a bachelor's degree from Deakin University.

Roles and relevant skills in meeting the requirements of retail authorisation: 6 years of energy retail operational experience and exposure including, channel management, the use of billing systems and an understanding of CATS transfer processes.

Abhimanyu Bhatia: IT Manager

Abhimanyu has been managing GEE's IT infrastructure since May 2018. Abhimanyu holds a Master of Science Degree Majoring in Network Systems from Swinburne University. Abhimanyu is proficient in the systems, design, processes and technology required to support a retail operation, in particular with regards to managing and AEMO pipeline, the Austraclear process and server set up and disaster recovery that needs to be in place to support a billing and call centre environment.

Third party providers of service

Billing Providers

GEE Power & Gas have opened discussions with a number of third-party providers who can provide the following services:

- Billing
- Transfer management, on-boarding, operation functions and credit management
- Call centre capability and dispute resolution services

GEE Power & Gas have shortlisted providers who are experienced and fully versed in the latest retail laws and guidelines in all contestable jurisdictions across Australia. A rigorous selection process will be in place to ensure that the third party, as a representative of GEE

Power & Gas, is a fully capable and competent of managing the customer relationship effectively. The following firms are currently under review to provide this meter-to-cash service:

- Utilibill
- Brave Energy Systems
- Tally IT
- Agility CIS

GEE Power & Gas will have awarded a contract to one of these providers prior to retail activities commencing, and after successfully obtaining a retail authorisation.

Sonne Energy Australia

Sonne Energy Australia is an energy retail specialist consultancy and management advisory group. With experienced consultants that have actively run energy retailers at an operational level and worked for a wide spectrum of energy retailers with deep networks in the industry, GEE Power & Gas have identified Sonne as a critical partner to assist its retail market entry.

GEE Power & Gas have engaged Sonne Energy to:

- assist with the documentation of the license application;
- advise on a suitable business structure to ensure it can retail energy responsibly and sustainably;
- introduce GEE Power & Gas to key specialist staff and third parties that it may/will hire before commencement of its retail operations;
- provide gap analysis and assist with fulfilment of any outstanding retail capacity requirements as identified;
- assist with setting up processes and training energy staff, and;
- provide ongoing advisory support to ensure that GEE Power & Gas retains the necessary technical capability for retailing energy products.

A business plan, including but not limited to, strategic direction and objective, forecast results and detailed assumptions on how you calculated these forecasts

Please refer to the business plan and financial assumptions in:

- *Confidential attachment 2*
- *Confidential attachment 3*

Details of your compliance strategy

GEE Power & Gas understands the retailing of essential services is subject to wide ranging laws, requirements and regulatory overview. A framework has been created which ensures GEE Power & Gas will manage and comply with all its obligations under the Retail Law and retail rules. It outlines the processes for systematic testing, reporting and process improvement required to identify and remedy breaches, which have been independently audited. GEE Power & Gas have also created its dispute resolution policy that aligns with Retail Laws and Rules.

Please see

- *Confidential attachment 4*
- *Confidential attachment 5*
- *Confidential attachment 7*

A copy of your risk management strategy covering both operational and financial risks

GEE Power & Gas have identified and highlighted key risks in the business plan. The risk management strategy has been outlined and has been subject to an external audit. Please see:

- *Confidential attachment 6*
- *Confidential attachment 5*

Details of any agreements and systems in place to facilitate interaction with relevant market participants including AEMO, distribution businesses, jurisdictional or technical regulators, government departments and market participants. Including steps taken to become a member of the Energy Ombudsman.

GEE Power & Gas have engaged with Distributed Network Service Providers (DNSP's), billing CRM providers and the Energy Ombudsman. Although GEE Power & Gas have begun the process of engaging AEMO, it is understood that membership (and Austraclear registration) is dependent upon the success of the retail authorisation application.

Evidence of these interactions can be found in:

- *Confidential attachment 8*
- *Confidential attachments 9 & 9.1*

5. Required Information – Financial resources

Details and Evidence of your current financial position

GEE Power & Gas has the financial resources to meet the requirements of an Australian Energy Retailer. In addition to the financial model provided in confidential attachment 3, please see the following:

- *confidential attachment 10.1*
- *confidential attachment 11.*
- *confidential attachment 3.1*

A written declaration from your Chief Financial Officer, stating GEE power & Gas Pty Ltd is a going concern and that the officer is unaware of any factor that would impede GEE Power & Gas' ability to finance GEE Power & Gass' energy retailer activities under the retailer authorisation for the next 12 months.

See *confidential attachment 10*

A written declaration from an independent auditor or your principal financial institution stating that:

- **An insolvency official has not been appointed in respect of the business or any property of the business**
- **No application or order has been made, resolution passed or steps taken to pass a resolution for the ending up or dissolution of the business.**
- **They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation.**

See confidential attachment 11

Forecast revenue and expenses to the point where your business is cash flow positive.

This forecast should be consistent with your business plan and highlight all key assumptions and risks.

See confidential attachment 3



6. Required Information - Suitability

Details of any situation where a RoLR trigger has occurred or likely to occur

GEE Power & Gas confirms that neither GEE Power and Gas Pty Ltd nor any of GEE Power and Gas associates, any other business where GEE Power and Gas Pty Ltd's officers have held an officer position or any entity that exerts control over GEE Power and Gas Pty Ltd's business have previously been subject to:

- any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.
- any previously revoked authorisations, authorities or licences held in any industry.
- any failed authorisation, authority or licence applications in any industry.
- any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.
- any situation/s where GEE Power & Gas Pty Ltd (or an associate) have previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely.

See confidential attachment 10

Offences or successful prosecutions

GEE Power & Gas confirms that no directors or any other person that exerts control over GEE Power & Gas's business activities including all persons who are responsible for significant operating decisions currently, have committed or has been subject to any offence or successful prosecutions under any state, territory, Commonwealth or foreign legislation (including, but not limited to, the Australian Securities and Investments Commission Act 2001 (Cth), Competition and Consumer Act 2010 (Cth)[1] and the Corporations Act 2001 (Cth)) relevant to GEE Power & Gas's capacity as an energy retailer.

See confidential attachment 10

Upon request a criminal history check conducted within last 12 months

All employees, directors and board members understand that a criminal history check can be requested by the AER. All GEE Power & Gas employees and associates will be compliant with such requests.

Statement from directors that are not disqualified from management of corporations

GEE Power & Gas confirms that members of its management team have not been disqualified from the management of corporations and there is no record of bankruptcy of GEE Power & Gas's management team (including in any overseas jurisdiction).

See confidential attachment 10

Full name and current residential address of all officers of the applicant

See confidential attachment 10

Details of policies and procedures addressing the probity and competence of officers and any other key management staff

GEE Power & Gas is in the process of developing the following documents and processes to ensure the probity and competence of its staff:

- draft employee contracts that have undergone legal review to ensure compliance with laws and regulations;
- code of conduct;
- training plan to ensure all staff are regularly updated and signed off to perform their duties;
- standard on-boarding plan to ensure all new team members are aware of minimum expectations, regulations and laws, and;
- compliance and risk frameworks that have been externally reviewed as fit for purpose to manage GEE Power & Gas 's obligations as an energy retailer.

7. Appendix

Public (along with this application document)

Attachment 1 – ASIC extract

Commercial in confidence

Attachment 2

Attachment 3

Attachments 4

Attachment 5

Attachment 6

Attachment 7

Attachments 8

Attachment 9

Attachment 10

Attachment 10.1

Attachment 11