

OVO Energy Pty Ltd

Australia



Application for a Gas Retailer Authorisation
under the National Energy Retail Law (NERL)

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1. Introduction

OVO Energy Pty Ltd is an Australian company, trading as OVO Energy, that is wholly owned by OVO Group Ltd. registered in England and Wales (UK). OVO Group Ltd. also owns and runs an existing UK electricity and gas retail business, OVO Energy Ltd. In the UK, OVO is licensed to sell electricity and gas to both residential and commercial customers, and was granted licenses by the Office for Gas and Electricity Markets (Ofgem) in 2009.

Since 2009, OVO Energy has grown successfully and now provides electricity and gas to nearly 1.4 million households, equating to well over 2 million supply points, throughout England, Scotland and Wales. The business has also grown to more than 1,500 employees across multiple offices and has diversified into new ventures that focus specifically on the electrification and decarbonisation of a smarter energy grid.

OVO Energy Pty Ltd applies to the Australian Energy Regulator (AER) under section 89 of the National Energy Retail Law (NERL) for a retailer authorisation for Gas.

OVO Energy Pty Ltd is also simultaneously applying for a retailer authorisation for electricity, submitted in August 2019.

2. General particulars

Legal name:	OVO Energy Pty Ltd
Trading name:	OVO Energy
ABN:	99 62 34 75 089
Registered address:	19/181 William Street, Melbourne VIC 3000
Correspondence address:	120 Spencer Street, Melbourne VIC 3000
Contact person: Name:	Mark Yemm
Position:	Managing Director (Australia)
Tel:	+61 (0)481 862 154
Email:	mark.yemm@ovoenergy.com.au
Form of energy:	OVO Energy is seeking a retailer authorisation for gas.
Timing:	OVO Energy intends to commence retailing gas in the jurisdictions mentioned below in October 2019, pending approvals.
Scope of operations:	The sale of gas to small customers.
Jurisdictions:	OVO Energy initially intends to retail gas in South Australia, ACT, New South Wales and Queensland.
Type of customers:	OVO Energy intends to supply small customers and small market offer customers, each as defined in section 5 of the NERL, and subject to applicable consumption thresholds under jurisdictional energy legislation.

3. Organisational and technical capacity

3.1 Energy retail experience

OVO Energy (UK) has been an energy retailer in the UK since September 2009 - licenced and regulated by the Office for Gas and Electricity Markets (Ofgem). Since this time, OVO has amassed a customer base of over 2 million domestic supply points (electricity and gas) at almost 1.4 million households. Current total electricity and gas account numbers are provided in Confidential Attachment 3.

OVO provides energy to residential customers via three dedicated brands - OVO Energy, Boost and Lumo (no affiliation with the Australian retailer). These retail offers are targeted at credit, prepayment and digital-only customers respectively. The company ethos and approach has always been to make a complex market simpler for customers, whilst providing them with excellent service and access to more renewable energy.

The company now employs over 1,500 personnel across multiple offices in Bristol and London, and other locations throughout the UK. The team is now broken into multiple departments that include, but are not limited to: Customer care, Quality, Operations, Forecasting and planning, Billing, Collections, Compliance, Training & HR, Business insights and reporting, Finance, Trading, Change implementation and management, Customer engagement, Product, Design, Technology, IT and Systems, Sales & Marketing, PR and Social.

Since 2009, the UK energy industry has seen a steady stream of new entrants, but OVO has been able to sustainably grow its customer base and continue to compete as one of the largest independent retailers. The company has grown at a fast pace, and continues to do so, whilst still maintaining high levels of service and winning multiple awards along the way.

In 2018, OVO also purchased a controlling stake in a German electricity and gas startup, as it began to take its technology and expertise to new geographies.

Also in late 2018, and again in early 2019, OVO was appointed by the regulator as the supplier of last resort for two failing energy retailers in the UK - ensuring the continuous energy supply and service to over two hundred thousand customers.

Any other retail or energy market experience?

The core focus for OVO in the UK is still electricity and gas retail, but the Group has also since diversified into new ventures that focus specifically on the electrification and decarbonisation of a smarter energy grid, including:

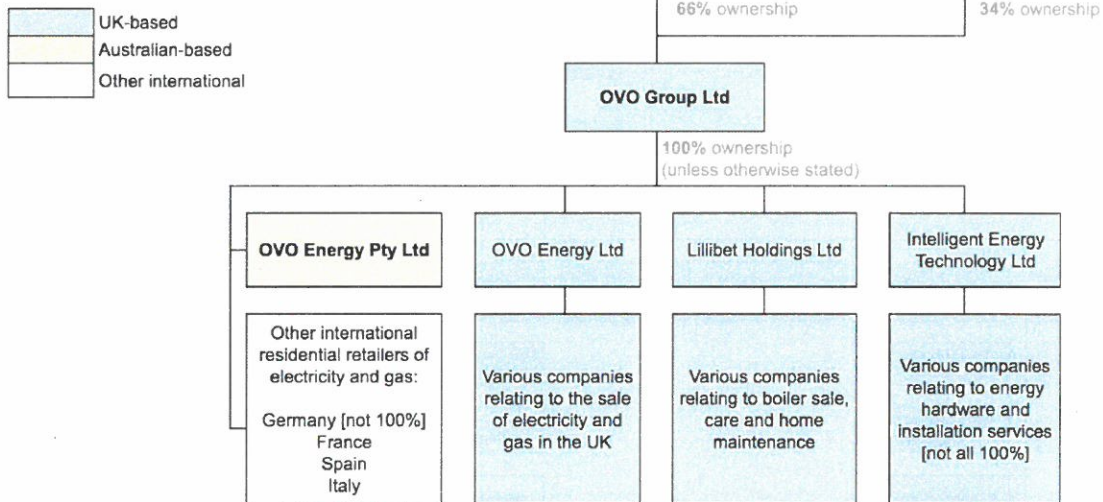
- Installation of smart meters, batteries & other in-home devices;
- The creation, testing and roll out of OVOs own electric vehicle chargers; and,
- Developing, testing and rolling out of various software to help better balance the grid.

3.2 Personnel

A full and detailed chart showing OVO's group structure is provided in Confidential attachment 4, but a short form version is also provided below:

OVO Group

Ownership structure - Simplified



OVO Group Ltd. is majority owned by imagination industries ltd. - also registered in the UK - with other significant shareholders, based in the UK and Japan. OVO Energy Pty Ltd is 100% owned by OVO Group.

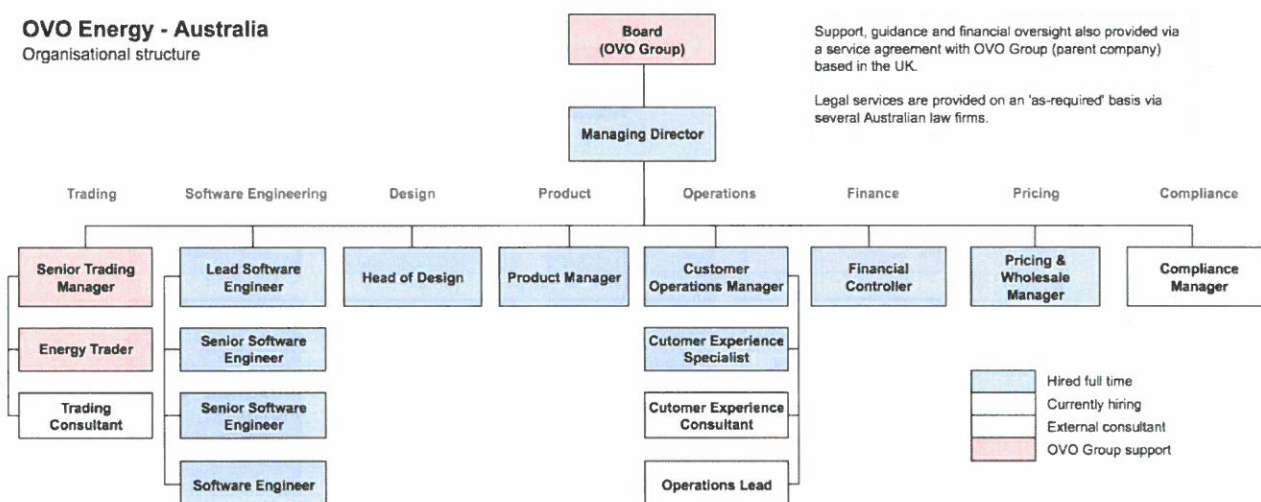
OVO Energy Pty Ltd

OVO Energy Pty Ltd currently employs eleven (11) full time personnel in Australia; two (2) of these individuals have accepted employment offers and signed their employment contracts (Senior Software Engineer and Pricing & Wholesale Manager), but have yet to start their positions - which will occur at the end of September and mid October 2019, respectively.

The below high level organisation chart outlines the key hires to date, the areas in which OVO has contracted consultants, and shows into which positions OVO is actively hiring additional personnel.

OVO Energy - Australia

Organisational structure



All key individuals in both Australia and the UK (where support, guidance or oversight is provided), and a summary of their experience and technical skills, is included in Confidential Attachment 5.

The key team members in Australia are listed below:

Mark Yemm - Managing Director

Mark was part of the team that launched OVO Energy in the UK in 2009. He then went on to build up various sales channels and commercial relationships to allow the core business to grow. He launched OVO's business energy retail arm - OVO for business - which was later sold off as the company focussed all activity on residential. He ran the team that launched OVO's prepayment retailer, Boost, which focuses on the proposition of providing digital tools and smart metering to the UK's 4.5 million prepayment customers. He also then ran the team that launched OVO's digital-only retailer, Lumo (no affiliation to the Australian retailer), a smartphone and online only proposition targeting more digitally-savvy customers throughout the UK.

Sheran Siriwardene - Financial Controller

Sheran has a wealth of energy retail experience - starting his career with Grant Thornton - where he spent several years as an Audit Manager, he then moved on to a position with one of the Big 3 energy retailers as FR&A Financial Accountant and later became an FP&A Finance Analyst / Business Partner. Throughout his time with this retailer he delivered and created financial models for annual budgets, three-year plans and quarterly forecasts for Wholesale markets gross margin and Opex/ Capex, balance sheet and cash flow and coordinated inter-dependencies between Merchant Energy, Retail Energy and other parts of the business to ensure consistency across all. Prior to OVO, he moved to a small retailer as

Finance Manager / Controller, where he created the finance function including reporting, accounting, market segmentation, tax, AP/AR/Payroll, budgeting and cashflow.

Nectaria Georgalis - Customer Operations Manager

Nectaria began her early career at one of the Big 4 Australian banks, across various roles - including several years in service centre management, change and communications management and then as Senior Sales Manager for Business banking. Later, She joined one of the Big 3 energy retailers, where she was initially Contact Centre Manager, then Sales Operations Manager for Home Services and finally Residential Customer Leader for Energy Services. Upon leaving this retailer, she took a role with a startup SME retailer as Customer Experience Manager - and set up all customer facing operations, leading the contact centre teams. Prior to joining OVO, She took a role with another small retailer, as National Sales and Retention Manager where she was directly responsible for driving sales activity and growth.

Aidan Lane - Lead Software Engineer

Aidan began his early career working at one of Melbourne's largest Universities in the Faculty of IT, where he became the Director of Education Technology Lab - he created and launched a cloud based educational resource repository to facilitate authoring, sharing, discovery and publishing of high-quality, interactive, media-rich learning modules and eBooks. Prior to OVO, He worked at an Australian multinational corporation that provides tax, accounting and other business services software to small and medium businesses. In his role as a Development Lead, he helped run software teams that allowed the business to deliver on its ambitious goals and growth targets.

William Sandall - Product Manager

Will has joined OVO from a Melbourne-based Virtual Power Plant (VPP) software startup that is focussed on utilising connected, distributed assets throughout the Eastern states of Australia. Will took on roles as Project solutions engineer and then more recently spent the last year as Product Manager - helping to define the direction of the software engineering products delivered. He has excellent insight on both in-front of and behind the meter technologies, and a sound understanding of the energy industry in Australia. Prior to this, Will was working for a similar entity based in London, again focussed on technology products that better regulate the grid and provide benefits from distributed assets. Will studied Renewable Energy and has an MEng.

The other roles that are currently filled, or with personnel to join in late September and mid-October 2019, are:

- Customer Experience Specialist
- Software Engineer
- Senior Software Engineer
- Head of Design
- Senior Software Engineer (end of September 2019)
- Pricing and Wholesale Manager (mid October 2019)

The other roles that aren't yet filled are currently being recruited for and details of recruiter contracts along with example position descriptions, are also provided. The key roles / areas include, but are not limited to:

- Operations Lead (Market operations)
- Customer Service & Sales

- Collections
- Complaints

Support is also provided by the OVO Group from the UK and this is covered by a signed service agreement provided in Confidential attachment 17. Whilst support for wholesale and trading is provided by both the UK and an Australia-based consultancy on a retainer agreement, the expectation is to also hire a Pricing and Wholesale Manager (as highlighted above) to help run this area of the business in-Country. The Group will provide both practical / hands-on support, access to digital platforms and shared services, and knowledge & experience from the UK and other geographies, with the team in Australia.

Identifying areas where we need local knowledge

Based on our extensive knowledge of the UK energy market, and working with consultants and contractors based in Australia, we have identified the key areas that we feel we need dedicated local support, and have begun hiring appropriately.

The initial core personnel aforementioned, are expected to build out their own teams and resources, with the expectation of ~12 personnel for launch. This will allow us to scale the business appropriately and the key areas of focus are also highlighted above.

3.3 External service providers

OVO Energy Pty Ltd has also contracted with several consultants / third parties, to fill the areas where specific expertise or experience is lacking for the Australian energy market, these include:

- **Compliance**
Working with a small consultancy who provide compliance and regulatory support, both during the application phase and also once the licence is granted. Considerable experience in the energy industry and have advised other now licenced suppliers throughout the application process, and ongoing.
- **Legal**
OVO is currently working on an 'as-required' basis with several Australian law firms that have expertise in energy.
- **Trading**
Working with a small consultancy to provide market insight and inform our strategy for wholesale activities, both in the short term and longer term. The agreement provides access to two individuals with considerable prior STTM experience.
- **Human Resources**
A Melbourne-based, small-scale consultancy, ensuring that we are compliant with all employment laws and legislation, treating our workforce fairly, and helping us to make all of our existing and future policies relevant and appropriate for the Australian market.

These third party providers have considerable experience in the Australian Energy market, and already work with other existing energy retailers; in nearly all instances they have done so for a number of years. The specific details associated with all external service providers are itemised in Confidential Attachment 6.

3.4 Business plan

OVO Energy Pty Ltd has developed a business plan and financial model for its operations in the AER regulated states, and has submitted this in full as Confidential Attachment 7. The plan outlines OVO's strategy around pricing and proposition development, as it intends to leverage experience, knowledge and proprietary software developed over the past 10 years of operating in the UK energy market.

Focus will initially be placed on delivering a targeted proposition for residential customers; this is the core part of the UK business and is where OVO has worked hard to make the energy market easier for customers to understand - and encouraged the uptake of more renewable energy. The key areas of focus for OVO will be around providing greater transparency, simple pricing and communications, and providing more digital tools to allow customers to better manage their own energy accounts.

The plan also outlines the way in which OVO intends to stage its launch throughout the jurisdictions for which it is applying for retail licences - entering one state after another - testing systems and processes before aiming to scale the business in each state and distribution area. Gas will form part of a dual fuel proposition, where OVO energy will aim to offer both electricity and gas combined accounts for customers within AER regulated jurisdictions.

This approach will ensure that OVO can build a sustainable business here in Australia. A financial model, with profit and loss, balance sheet and detailed cash flow forecast over 5 years forms part of this business plan.

3.5 Compliance strategy

OVO Energy Pty Ltd understands the rules with which it must comply under the NERL, the NERR, the applicable jurisdictional energy legislation, and any other applicable laws, regulations, guidelines and codes. A robust Retail Compliance Policy has been developed to ensure that OVO Energy Pty Ltd is compliant with all of its legal obligations as an authorised retailer. An independent auditor (Shared Safety and Risk) has reviewed this document and provided signed written assurance that it is appropriate for its intended purpose. OVO has provided its Retail Compliance Policy as Confidential Attachment 8.

OVO Energy Pty Ltd has also obtained external legal and compliance advice in relation to its obligations as a retailer, via a suitably experienced legal and compliance consultancy, who have worked with and continue to work with other licensed retailer in AER jurisdictions, for 10+ years - see Confidential Attachment 6 for further details.

3.6 Complaints and dispute resolution

A copy of the OVO Energy Pty Ltd Complaint Handling Procedure is included in Public Attachment 1.

3.7 Risk management strategy

OVO Energy Pty Ltd has created a dedicated Risk Management Policy to not only ensure that it is compliant with all of its legal obligations as an authorised retailer, but in order to evaluate and reduce risk as a business. To be effective, risk management - like compliance - must become part of an organisation's culture. It should be embedded into the organisation's philosophy, practices and business processes rather than be viewed or practised as a separate activity. By doing this, everyone in the organisation becomes involved in the management of risk. The Risk Management policy

outlines OVO's specific approach to identifying, reporting and mitigating risks, that include, but aren't limited to:

- Transaction risk;
- Operational risk; and,
- Legal and Compliance risk.

The role of the board is to work with the Managing Director to better define the overall risk appetite of the business. The Managing Director will then manage this on a day to day basis; instilling an approach, and creating dedicated policies and procedures as required. Regular reviews are to be undertaken and when required, OVO Energy will develop a Risk Assessment covering the specific risks. Each one is measured by examination of likelihood and consequence. Controls are then developed to cover all risks, and mitigate any potential impact.

An independent auditor (Shared Safety and Risk) has reviewed this policy document and provided signed written assurance that it is appropriate for its intended purpose. A copy of the OVO Energy Pty Ltd Risk Management Policy is included in Confidential Attachment 9.

3.8 Endorsement of policies and external assurance process

The compliance strategy and related policy documents along with the risk management strategy and related policy documents have been the subject to an external assurance process and approved by OVO Energy Pty Ltd directors – see Confidential Attachment 2.

3.9 Customer arrangements

Customer contracts

For the purposes of section 22 of the NERL, OVO Energy Pty Ltd will use the model terms and conditions for standard retail contracts set out in Schedule 1 of the NERR as the basis for its standing offers.

OVO Energy Pty Ltd will prepare market retail contract terms and conditions, as part of the development of its proposition and pricing for residential customers. Copies of the terms and conditions will be provided to every new customer and will also be made available on the OVO Energy Pty Ltd website (www.ovenergy.com.au), when complete.

Customers in hardship

OVO Energy Pty Ltd has prepared a Customer Payment Difficulty Policy - a copy of this is included in Public Attachment 2.

Customer information and consent

OVO Energy Pty Ltd understands its obligations under the Privacy Act (1988) in relation to customers' personal, sensitive and credit & credit eligibility information and under the NERL and the NERR in relation to obtaining customer explicit informed consent where required; this policy document is included in Public Attachment 3 and will also be readily available on the OVO Energy Pty Ltd website.

3.10 Energy ombudsman schemes

OVO Energy Pty Ltd will apply to become a member of the ombudsman customer dispute resolution scheme in each Jurisdiction and has initiated discussions with the relevant ombudsman schemes: see Confidential Attachment 10.

3.11 Arrangements with other market participants

OVO Energy Pty Ltd has contacted the various other market participants, and where appropriate has initiated applications in order to be granted access to the service. The specific areas include:

AEMO Registration

OVO Energy Pty Ltd has commenced registration with AEMO as a market participant (retail) in the Short Term Trading Markets (STTM). The application form, Application ID / mnemonic and correspondence with AEMO can be provided if required. AEMO have set prudential requirements for the maximum credit limit (MCL), and are working with OVO Energy Pty Ltd to allow access to the STTM.

ASX Austraclear participation

OVO Energy Pty Ltd has successfully gained a participation ID with Austraclear for the purpose of settling gas transactions in the Short term trading markets (STTM). ID and correspondence with ASX Austraclear can be provided if required.

Australian financial services licence (AFSL)

OVO Energy Pty Ltd will manage its wholesale gas market exposure through ASX futures contracts and does not currently need to hold an Australian financial services licence (AFSL); although it is exploring an agreement with an existing AFSL accredited consultancy.

Distributors and meter service providers

OVO Energy Pty Ltd is in dialogue with those gas distributors in the Jurisdictions – see Confidential Attachment 11. These distributors are currently responsible for the engagement of metering service providers. OVO Energy Pty Ltd is also in discussion with a digital metering service provider - the details of which can be provided upon request.

4. Financial capacity

4.1 Financial position of OVO Energy Pty Ltd

OVO Energy Pty Ltd will initially be funded by OVO Group Ltd. in the UK, until it becomes either self-sustaining or profitable, and a parent company deed of guarantee is provided as part of this application. OVO Energy Pty Ltd applied for, and was granted, financial reporting relief for the period ending December 2018; the company was incorporated in Australia on 18th December 2017, but did not commence any activity in the Country until October 2018. Although not formally submitted to ASIC (Australian Securities and Investments Commission), OVO has also provided current management accounts as part of the Confidential attachment 12, along with current bank statements for both OVO Energy Pty Ltd and OVO Group Ltd (UK).

OVO Energy Ltd. (UK) and OVO Group Ltd. (UK) financial reports for the past three financial years are included in Confidential Attachment 12.

A credit rating for OVO Group (UK) has also been obtained via Dun and Bradstreet and is provided in Confidential Attachment 13.

4.2 Statutory declaration - Financial viability

The Managing Director of OVO Energy Pty Ltd has provided a signed Statutory Declaration which states that OVO Energy Pty Ltd is a going concern and that he is unaware of any factor that would impede OVO Energy Pty Ltd's ability to finance its energy retailer activities under a retailer authorisation for the next 12 months. The signed declaration is provided as Confidential Attachment 18.

4.3 Independent auditor - Financial

Audited financial accounts for OVO Energy Ltd. (UK) and OVO Group Ltd. (UK) financial reports for the past three financial years are included in Confidential Attachment 12. OVO Energy Pty. Ltd. is yet to commence trading, and received financial reporting relief for the most recent reporting period. OVO Energy has also provided a signed independent auditor declaration 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 winding up or dissolution of the business;
- They are unaware of any other factors that would impede OVO Energy's ability to finance its energy retail activities under the authorisation.

This declaration is provided as Confidential attachment 19.

4.4 Additional finance arrangements

A parent company deed of guarantee, signed by the Chief Financial Officer of OVO Group (UK) and Chief Executive Officer of OVO Group (UK) - along with the Directors of OVO Energy Pty Ltd - is provided in Confidential Attachment 16.

4.5 Revenue forecast

This is included in the Business Plan – see Confidential Attachment 7.

5. Suitability

5.1 Compliance history

OVO Energy Pty Ltd, its associates, other businesses of which an OVO Energy Pty Ltd officer has been an officer, and other businesses that control the OVO Energy Pty Ltd business activities have had zero instances of the following:

- Licenses/authorisations which have been revoked;
- Previous unsuccessful licence/authorisation applications;
- Past or present administrative or legal action in relation to any licence application;
- Previous retailer of last resort events;

With regards to previous material non-compliance with any law or regulatory requirement - OVO Energy (UK) does currently have an open investigation with the UK Energy regulator, the Office of Gas and Electricity Markets (Ofgem). This investigation relates to giving customers consumption information that is accurate, or based on a best estimate, complete, and not misleading. This investigation was opened in February 2018, and OVO are complying with all requests for further information from the regulator.

In September 2018, the remit of this investigation was widened to include the Statement of Renewal Terms (providing information regarding estimated annual costs and annual savings), the promotion of the Priority Service Register and provision of final bills (issued within 6 weeks of a customer leaving supply). Ofgem has notified OVO Energy (UK) of the Authority's decision to expand the scope of the existing investigation to include these areas - and stated that "the widening of this investigation does not imply that we have made any findings about non-compliance".

It should also be noted that, whilst the outcome of this investigation is still pending, Ofgem still chose OVO Energy (UK) to be the Supplier of Last Resort for two energy suppliers who had since gone into administration (the first in November 2018 and second in January 2019) - events which saw OVO Energy (UK) take on electricity and gas supplies at several hundred thousand households.

5.2 Offences or prosecutions

The following have not committed or been prosecuted for any offence under Commonwealth, state or territory law or any foreign legislation relevant to OVO Energy Pty Ltd's capacity as an energy retailer:

- OVO Energy Pty Ltd;
- any director of OVO Energy Pty Ltd;
- any other person that exerts control over OVO Energy Pty Ltd's business activities; or
- any other person responsible for significant operating decisions of OVO Energy Pty Ltd.

5.3 Criminal history checks

Criminal history checks are available upon request for the individuals mentioned in Confidential Attachment 14.

5.4 Declaration - Bankruptcy and disqualification from management

Neither the Applicant, nor any associated entities, nor any officers of the Applicant or businesses

where the Applicant's officers have held an officer position:

- Have had 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;
- Have had previously revoked authorisations, authorities or licences held in any industry;
- Have failed authorisation, authority or licence applications in any industry;
- Have any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry; or
- 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.

There have been no offences committed against, or been prosecuted under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the Australian Securities and Investments Commission Act 2001 (Cth) Competition and Consumer Act 2010 (Cth) and the Corporations Act 2001 (Cth)) by the Applicant's directors (including any shadow or de facto directors) or any other person that exerts control over the Applicant's business.

No members of the management team have been disqualified from the management of corporations or are or have been bankrupt (including overseas). A signed declaration to this effect is provided in Confidential Attachment 1

5.5 Names and addresses of officers

The names and addresses of all officers associated with OVO Energy Pty Ltd. are submitted as Confidential Attachment 14.

5.6 Policies and procedures addressing probity and competence

Various policies and procedures outlined above and included in various attachments contain detailed information covering the probity, and competence of key staff including: Code of Ethics, Training and Compliance Management. Further detail is also provided in Confidential Attachment 15.

PUBLIC ATTACHMENTS

1. Complaint Handling Procedure

2. Hardship Policy

3. Privacy Policy

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