

POWOW POWER

AUTHORISATION APPLICATION



1. Introduction

This is an application by Powow Power Pty Ltd for a retail authorisation for the sale of electricity in those states that have adopted the National Energy Consumer Framework.

Powow Power is an Australian proprietary company limited by shares.

This application consists of the following:

- Part One of this document provides the Required Information: general particulars;
- Part Two of this document provides the Required Information: organizational and technical capacity;
- Part Three of this document provides the Required Information: financial resource;
- Part Four of this document provides the Required Information: suitability; and
- Attachments to this document, as referenced throughout.

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2. Part One: Required information – general particulars

| | |
|-------------------------------------|---|
| Legal name: | The applicant is Powow Power Pty Ltd |
| Trading name: | As above. |
| ABN: | 39 644 212 322 |
| ACN: | 644 212 322 |
| Registered business address: | Level 1, 530 Botany Road, Alexandria NSW 2015 |
| Postal address: | As above. |
| Contact person: | Name: Jin Woo Kim Position: Director Address: Level 1, 530 Botany Road, Alexandria NSW 2015 |

Email: jin@powow.com.au

Mobile: [REDACTED]
[REDACTED] [REDACTED]

Form of energy: Electricity

Commencement date: 10 December 2020

Jurisdictions: NSW, ACT, SA, and QLD

Type of customers: Small and Large residential and commercial

2.1 Nature and scope of operations

Powow Power, part of the GTL Group Holding, offers clean energy solutions to individuals and businesses in Australia. GTL Holding Group operates a fully functional VPP platform under Shine Hub Pty Ltd that has been designed to give customers a higher rate of return when they combine energy storage with generation or operate energy storage alone. Powow Power will operate as an electricity retailer in those states that have adopted the National Energy Customer Framework (**NECF**).

The AER's State of the Energy Market Report 2020 provides a comprehensive outline of the electricity market. The Report notes that 'There are still many consumers who may not want to, or simply cannot, effectively engage in what is a complicated market.'

The prices paid for electricity have, recently, been decreasing including in response to the Default Market Offer set by the AER. From July 2019 to January 2020, standing offer prices for residential consumers fell by 11-13 per cent in NSW, 12 per cent in South Australia and 10 per cent in south east Queensland.

The common confusion from consumers, that have existed in the market for some time, remain. These include vulnerable customers and their capacity to afford energy costs.

One of the consequences of the uptake of renewable energy is the concern to ensure that the electricity market can manage power system security and reliability risks. As a result we have seen AEMO directs some generators to operate even when economic and has constrained some lower-priced generators from operating.

Powow Power exists in this context. The various challenges within the existing market present an opportunity to Powow in that we are seeking to combine our expertise with Virtual Power Plants to bring cheaper electricity one to consumers, including consumers who currently struggle to pay their power bills, grid support and

stability

3. Part Two: Required information – organizational and technical capacity

3.1 Details of previous experience as an energy retailer

The applicant has engaged individuals and suppliers with significant experience in the energy market.

The hiring of the applicant reflects its assessment regarding required capability, as noted above. The individuals hired or engaged by the applicant have worked in or for energy retailers and including in energy compliance and risk management. Compliance and risk management have been identified as key areas of concern by Powow Power.

The business has very experienced individuals working with it including:

1. Our chairman, Yunlu (Lucas) Guo, who has substantial academic experience in renewable energy and in automation having worked with State Grid.
2. Our CEO, Mr Jin Woo Kim, with university qualifications in engineering and extensive experience within energy businesses including within tier 1 electricity retailers.
3. Our COO, Claire Cao with experience in both financial management and risk management and financial markets.
4. Our CMO, Alexander Georgiou, very experienced in customer engagement, marketing and customer experience.
5. Our Head of IT Engineering Satheesh Thikku Veethil has over 15 years of experience in big data analysis and experience in building and scaling both front and back end utilising the latest technologies.

3.2 Third party involvement

Empower analytics is a specialist energy consulting group that has considerable depth of knowledge and experience in the electricity industry of Australia. Carl Daly is

the managing director and has been actively involved in the electricity market since deregulation in Victoria in the mid-1990s.

Carl's experience includes:

- Former trading manager at Power Cor Australian & Origin Energy;
- voted by the industry as trader of the year in 2001
- worked for many years advising a state-owned franchise retailer providing regular trading and risk management services using extensive probabilistic modelling and forecasting techniques
- over the period of 2015 and 2016, was concurrently the managing director of the boutique trading house that successfully sold risk management products to a small boutique retailer who had substantial load swings.

The services that will be provided by this consultant include market modelling and forecasting, market information including in relation to wholesale trading and environmental certificate trading, trading analytics and management, and technical analysis.

Additionally, the business will engage industry-leading experts Compliance Quarter to provide regulatory compliance support including as our outsourced compliance manager. Compliance Quarter provide services to a wide range of the electricity retail market in Australia including to large and reputable businesses and to small start-ups.

3.3 Business plan

Please refer to **Confidential Annexure 3** provided on a commercial in confidence basis, a copy of the applicant's business plan.

3.4 Compliance strategy

The board of Powow Power recognises that an effective compliance management system, as defined in AS/ISO 19600:2015, is central to the company's strategy and achievement of its financial and business objectives.

Powow Power is committed to an effective compliance program implemented in

accordance with AS/ISO 19600:2015. Powow Power's Compliance Policy (**Confidential Annexure 5**), demonstrates the extent to which the standard has guided Powow Power.

Powow Power understands and will implement a range of measures to ensure compliance with regulatory obligations. The applicant's regulatory obligations include those under Energy Law (including the National Energy Retail Law, National Energy Retail Regulations and various Victorian instruments), the *Telecommunications Act 1997*, the *Do Not Call Register Act 2006* and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*).

The board of Powow Power has overall responsibility for setting and overseeing the corporate governance and compliance standards that are implemented by the Compliance Committee consisting of a member of the board, our Compliance Lead and business managers.

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Please find attached (provided on a commercial in confidence basis):

- **Confidential Annexure 5:** Powow Power Compliance Policy;
- **Confidential Annexure 4:** Powow Power Code of Ethics;
- **Confidential Annexure 6:** Powow Power Internal Audit Policy;
- **Confidential Annexure 7:** Powow Power Risk Management Policy;
- **Annexure 2:** Powow Power Complaints Policy; and
- **Annexure 1:** Powow Power Privacy Policy.

The guiding principles for the applicant's complaints management program are contained in AS/ISO 10002-2006. Under the applicant's Complaints Policy Customers have a right to lodge a complaint at any time.

Powow Power is committed to freely receiving and resolving complaints in an accessible and transparent way. In all instances, Powow Power will:

- Freely accept complaints lodged on our website, in person, by telephone, facsimile, email or letter;
- Acknowledge any complaint received as soon as possible;
- Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;

- Keep the complainant updated about the investigation and any proposed resolution;
- Notify the complainant as soon as possible of the outcome of our investigation and any proposal we have for resolution; and
- Provide the complainant with the option of an internal review of their complaint if they are unsatisfied with the outcome of the investigation or the proposed resolution.

The business has access to various training material provided by Compliance Quarter.

Training programs have been developed in relation to key areas of regulatory risk and focus. For example, affordability and customer hardship are recognised by the business as being areas of focus given the consequence of non-compliance on consumers. The company has access to online training on the operation of the national electricity market, energy retail governance, customer hardship, express informed consent, customer complaints, and risk management.

Additional training will be obtained via face-to-face and webinar sessions delivered by Compliance Quarter and by industry bodies including AEMO. Our key staff of undertaking training including in the use of the AUSTRACLEAR system and on various components of the energy market.

3.5 Risk management strategy

AS/ISO 31000:2009 provides a generic guide for managing risk. This standard may be applied to a very wide range of activities, decisions or operations. Powow Power has adopted AS/ISO 31000:2009 as its base guidance document for addressing risks.

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.

The board of Powow Power has overall responsibility for ensuring that there is a sound system of risk management across the business.

The board is also responsible for defining the overall risk appetite of the business, and for approving policies and ensuring that these are implemented. The board will approve the Risk Management Policy and will in the normal course, approve changes and updates to it, on a case-by-case basis.

3.6 Details of external audit of compliance and risk strategy

Powow Power's Compliance Plan and Risk Management Policy are undergoing external review.

3.7 Additional information which demonstrates ability to manage risk and operate in accordance with the Retail Law objective, particularly the long-term interests of consumers

The AER, on request, will be provided with a login to a compliance system that will be used in the management of our compliance program.

3.8 Memberships or steps taken to obtain memberships of a recognised energy industry ombudsman scheme in the relevant jurisdiction:

Powow Power has noted that it will apply to the Energy and Water Ombudsman New South Wales (**EWON**) for membership of the scheme and with all other relevant jurisdictional ombudsman schemes. Membership will be obtained prior to operation.

3.9 Agreements in place with key market players within the relevant jurisdictions (distribution businesses and AEMO) If agreements not finalised provide information as to negotiations

Powow Power has had discussions with AEMO via the group companies in relation to the VPP offering. Powow will obtain market customer status before operating as an energy retailer and anticipates lodging an application following lodgement of this application.

4. Part Three: Required information – financial resources

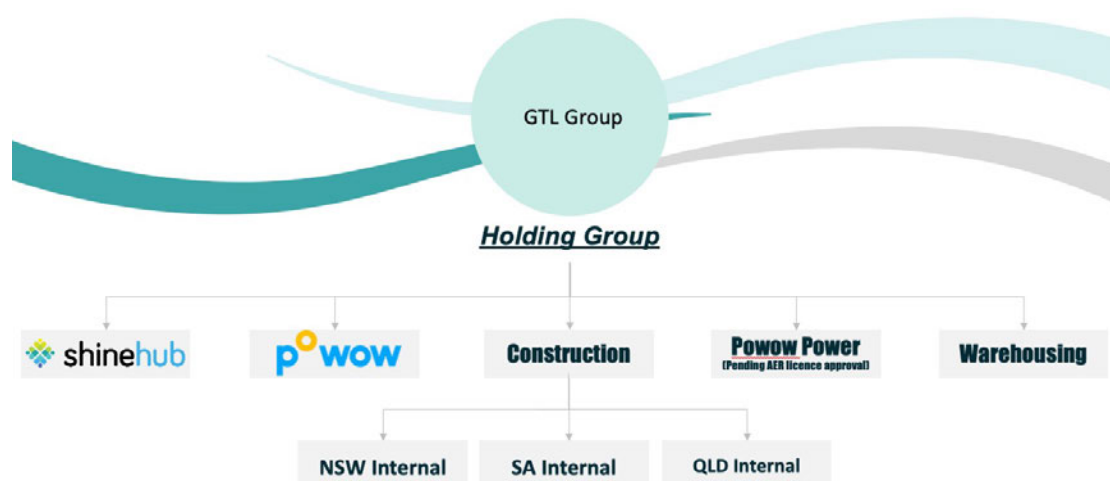
4.1 Details and evidence of current financial position, for example, interim financial statements.

Please find attached documentation confirming Powow Power's current financial position marked '**Confidential Annexure L1**' and provided on a commercial in confidence basis.

Bank statements for the [REDACTED] attached and marked **Confidential Annexures 25 and 26**. A financial statement for the holding company is attached and marked **Confidential Annexure 27**.

4.2 Group structure

The group structure in terms of operating is set out below. Please refer to **Confidential Annexure 19** for further details on the legal structure.



4.3 Declaration from CFO (or CEO or director)

Please find attached declaration from Powow Power's CEO confirming the Powow Power current financial position marked **Confidential Annexure 23** and provided on a commercial in confidence basis.

Please find attached declaration from Powow Power's CEO concerning the solvency of officers marked **Confidential Annexure 24** and provided on a commercial in confidence basis.

4.4 Declaration from independent auditor

Please find attached declaration from an independent accountant confirming the company's current financial position and capability marked **Confidential Annexure 20** and provided on a commercial in confidence basis.

4.5 Details of any bank guarantees or arrangements or process to access additional capital.

The company operates under a cross company guarantee. A copy of the Cross Company Guarantee is attached and marked '**Confidential Annexure 21.**' Bank statements for the holding company are attached and marked **Confidential Annexures 25 and 26.**

4.6 Revenue and expenses forecast

Please find attached a financial plan included in the business plan for Powow Power marked **Confidential Annexure 18** and provided on a commercial in confidence basis.

5. Part Four: Required information – suitability

Powow Power is a fit and proper entity to hold a retail authorisation. Neither itself, its related body corporates, its officers or associates have had any criminal or civil convictions.

5.1 There have been no regulatory failures by either entity.

There has not been (by Powow Power, its associates, officers, businesses where officers have held an officer position, or other entity that exerts control over Powow Power) 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.

5.2 There have been no revocations of authorisations, authorities or licences by either entity.

Powow Power, its associates, officers, businesses where officers have held an officer position, and other entities that exert control over Powow Power have not held authorisations, authorities or licences that have been revoked.

5.3 There has been no legal action taken in relation to any regulatory breaches.

Powow Power, its associates, officers, businesses where officers have held an officer position, or other entities that exert control over Powow Power have not been a party to legal action taken in relation to any regulatory breaches.

5.4 Neither entity has triggered the RoLR provisions or any equivalent provisions.

Powow Power, its associates, officers, businesses where officers have held an officer position, or other entities that exert control over Powow Power have not triggered the RoLR or equivalent provisions.

5.5 There have been no offences found nor successful prosecutions under any Territory, State, Commonwealth or foreign legislation against either entity.

There have been no offences found nor successful prosecutions under any Territory, State, Commonwealth or foreign legislation against Powow Power, its associates, officers, businesses where officers have held an officer position, and other entities that exert control over Powow Power.

5.6 There have been no offences found nor successful prosecutions under any Territory, State, Commonwealth or foreign legislation against any current director of either entity.

There have been no offences committed nor successful prosecutions under any Territory, State, Commonwealth or foreign legislation against any current director of Powow Power.

5.7 Written declaration from Chief Financial Officer (or CEO)

Please find attached declaration from Powow Power's CEO marked **Confidential Annexures 23 and 24** and provided on a commercial in confidence basis, confirming:

- that members of the Powow Power management team have not been disqualified from the management of corporations;
- the record of bankruptcy of the Powow Power management team (including in any overseas jurisdiction).

5.8 Full names and current residential addresses of all your officers.

Please find attached details of the Powow Power officers marked **Confidential Annexure 19** and provided on a commercial in confidence basis.

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

Please find attached documents which are relevant to this component of the application:

- **Confidential Annexure 5**: Powow Power Compliance Plan; and
- **Confidential Annexure 4**: Powow Power Code of Ethics.

Version Control

| Version | Amendment | Author and Date |
|----------------|------------------|------------------------|
| Version 1 | Not applicable | CJ 07/08/2020 |
| Approved | | PW 12/10/2020 |

PRIVACY POLICY



1. GENERAL

- 1.1. Powow Power Pty Ltd ("us or we") respect the privacy of visitors to our websites ('**Sites**'), our customers and other individuals who interact with us.
- 1.2. We have created this privacy policy to explain how we collect, store, use and disclose personal information.
- 1.3. Access to our privacy policy is free. If you would like us to post you a copy of our privacy policy, or have questions about it or its contents, please call us on 1800 864 026.
- 1.4. The *Privacy Act 1988* (Cth) ('**Privacy Act**') includes thirteen (13) Australian Privacy Principles ('**APPs**'). The APPs regulate the way many companies collect, use, hold and disclose personal information.
- 1.5. We have adopted an approach consistent with the Privacy Act, the APP's and the APP guidelines.
- 1.6. Our practices and internal policies follow this privacy policy and our staff must ensure compliance as a condition of their employment. In any third-party contracts we enter into, there is a duty to maintain personal information under this privacy policy and in a manner consistent with the Privacy Act.
- 1.7. Occasionally we will update this privacy policy. If we do so we will update the version number. Any changes to this privacy policy will follow our legal obligations.

2. HOW AND WHY WE COLLECT PERSONAL INFORMATION

- 2.1. The Company collects personal information in several ways. The most common ways we collect personal information include:
 - 2.1.1. **From application forms (online or hard copy or completed via telephone):** when individuals apply to become members of clubs run by us, or subscribe to marketing or communications lists, to provide news, information, offers and other services under terms of the club or list.

- 2.1.2. **From order forms (online or hard copy or via telephone):** when goods and services are ordered by distributors and retailers: to fulfill the order and deliver the goods, and to maintain our relationship with the individual concerned.
 - 2.1.3. **From telephone, email, written and in-person enquires:** to respond to enquires.
 - 2.1.4. **Business cards:** when you enter into transactions with us or otherwise interact with us in a business context including from your business card.
 - 2.1.5. **From online or hard copy surveys:** for the purpose of reviewing and analysing the results and following up on results.
 - 2.1.6. **Any messages or comments submitted to us via the Site:** which may include personal information such as your name, email address and telephone number.
 - 2.1.7. **From public registers including social networks such as LinkedIn:** if you have made this information available, for the purpose of obtaining your contact details.
 - 2.1.8. **From Sites through automatic processes such as cookies:** Cookies are used to better understand users and improve the layout and functionality of our Sites by collecting information such as date, time and duration of visits and which pages are most commonly accessed. This tracking is conducted in such a way as to ensure the anonymity of visitors to Sites. While cookies may identify the computer, it should not identify the individual. With most internet browsers, users can erase cookies from their computer's hard drive, block all cookies or receive a warning before a cookie is stored. However, some parts of this Site may not function fully for users that disallow cookies.
- 2.2. Our Sites may collect other information that may or may not be personal information. For each visitor to the Site, our server automatically recognises and stores the individual's "IP address" (eg. the domain name or Internet Protocol address), the type of Internet browser being used, the address of the site that "referred" the individual to our website and clickstream data. If this information cannot be used or combined with other data to identify you, it will not be personal information.
- 2.3. We generally collect personal information for the purpose of providing you with any goods or services that you request, to update our Sites, to improve the services or goods that we provide and to develop our business.

3. WHAT PERSONAL INFORMATION IS COLLECTED?

- 3.1. We aim to only collect personal information that is necessary to fulfil the purpose for which you have disclosed it, or as required by law.

- 3.2. You will typically be asked to provide contact information (such as your name, telephone number, postal address and email address). You may also be asked for demographic information (such as your age and gender) and/or profile data.
- 3.3. Sometimes, we may need to ask you for additional information necessary to provide you with the goods or services you have requested. When we ask you for further information in addition to what you provide to us initially, we will tell you why we are collecting that information.
- 3.4. We aim to only collect information that is absolutely necessary to provide you with any service you have requested. If you would prefer to remain anonymous, we are happy to still deal with you, provided that we don't need to know who you are. Instances where this may be possible include where you are providing us with anonymous feedback that does not require a response.
- 3.5. We do not collect sensitive personal information.

4. ELECTRONIC COMMUNICATIONS

- 4.1. Sometimes, where you have provided consent, or consent is deemed to have been provided or conferred (in compliance with the APPs) we may use your personal information to send you marketing communications including by electronic means such as email, SMS, MMS for an unlimited period. You may opt-out of receiving such messages at any time provided such messages are sent by us. We will give you the opportunity to opt-out within the message that we send to you. You may also opt-out by contacting us (using the details provided below).

5. STORAGE OF PERSONAL INFORMATION

- 5.1. Any information we collect about you will be kept securely by us unless an event beyond our control disrupts the measures we have in place. We use a range of measures to ensure the security of the data we keep and to prevent unauthorised access, destruction, use, modification or disclosure. We have procedures in place with regards to staff access to personal information and ensure that only those staff who need to know have access to your information.
- 5.2. We will only store personal information for so long as it is required either to fulfil the purpose for which it was collected or to fulfil our obligations at law. We will conduct regular reviews of the personal information we hold and destroy or de-identify information no longer required.

6. DISCLOSURE OF PERSONAL INFORMATION

- 6.1. Generally, personal information will not be disclosed to individuals or organisations outside of Powow Power without your prior consent. However, in the circumstances described below, personal information may be disclosed to:
- 6.1.1. **Essential service providers:** There may be other companies that we rely on to provide goods or services to you. We may be required to provide your personal information to these companies to ensure that we can deliver goods or services to you.
 - 6.1.2. **Law enforcement or government bodies:** There are exceptions under the Privacy Act with regards to the provision of personal information to law enforcement or government bodies. When a legitimate request is sent to us by a law enforcement or government body we will comply with that request and may provide personal information about you without your consent.
 - 6.1.3. **Companies related to us or who take control of part or all of our business:** In providing personal information to us you will need to be aware of the possibility that, in future, another company may take control of part or all of our business. In that case, your personal information will be provided to that company.
- 6.2. If we disclose personal information to a third party under outsourcing or contracting arrangements (a service provider), we will take steps to ensure that they have:
- 6.2.1. Signed a binding agreement;
 - 6.2.2. Handle the personal information in a manner consistent with the APPs (regardless of whether they are a small business, or would otherwise be exempt from the Privacy Act);
 - 6.2.3. Only use the personal information in order to provide specific services or to perform the specific functions required; and
 - 6.2.4. Store the personal information securely, and only for as long as is necessary to provide the required services to perform the required functions.

7. ACCESS TO PERSONAL INFORMATION

- 7.1. Under the Privacy Act, you have the right to seek access and to update or correct the personal information that we hold about you. If you wish to exercise your right under the Privacy Act to seek access to the personal information held for you, you should make the request in writing (to the address specified below).
- 7.2. Ordinarily we will not charge for providing access/copies of personal information we hold about you, and will generally respond to access requests of this type within 30 days. If we anticipate there

being a fee (for the time we spend locating and compiling the information you have asked for) we will provide you with an estimate before proceeding. If a fee is payable it will be based on an hourly rate plus the cost of photocopying or other out of pocket expenses. For legal and administrative reasons, we may also store records containing personal information in archives. Access to these historical records may result in a charge being incurred (an estimate will be provided to you prior). Due to the nature of archive, requests for access to historical records may take longer to process than with current records.

- 7.3. You may correct the personal information we hold about you at any time, you should make the request in writing (to the address specified below). We do not charge a fee to correct personal information held.
- 7.4. On review of your request, if we agree that the personal information held is not accurate, complete and up to date, it will be corrected by the appropriate person. If we do not agree, you will be provided with the reason(s) for the views and the opportunity to make a statement of your view and have it included with the information held.

8. COMPLAINTS

- 8.1. You have a right to complain to us if you are concerned about your privacy, how we have dealt with your personal information or in relation to the Privacy Act.
- 8.2. If you are concerned about how we have dealt with your personal information you should first contact us (using the details set out below). We will endeavour to send you a written response within 10 business days.
- 8.3. If you are not satisfied with the way we have managed or attempted to resolve your complaint you may complain to the Office of the Australian Information Commissioner by calling them on 1300 363 992, via their website at www.oaic.gov.au or by mail to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

9. LINKS TO THIRD-PARTY WEBSITES

- 9.1. Our Sites contain links to third party websites for individual's convenience and information. Individuals should be aware that when they access a third-party website, we are not responsible for the privacy practices or policies of that third party and will not be liable for any use or disclosure your personal information by any third party to whom your information is sent. We suggest that you review the privacy policy of each website you visit.

10. ACCEPTANCE OF THESE TERMS

10.1. By using the Sites, you signify your acceptance of this privacy policy. If you do not agree with this policy, please do not use our Sites or provide us with your personal information. Powow Power reserves the right to modify, alter or otherwise update this policy at any time. Should Powow Power modify, alter or otherwise update this policy, it will prominently post notice(s) of the changes on the Sites covered by this privacy policy.

11. CONTACT DETAILS

Company Name: Powow Power
Telephone: 1800 864 026
Email: customer@powow.com.au
Mailing address: Level 1, 530 Botany Road, Alexandria NSW 2015.

Version Control

| Version | Amendment | Author and date |
|-----------|-----------|-----------------|
| Version 2 | | 07/08/2020 |

Standard Complaints and Dispute Resolution Procedure

Powow Power



1. Introduction

Powow Power is an energy retailer operating in NSW, QLD, and SA. This document sets out our procedures for accepting, recording, and resolving complaints.

We are committed to receiving and resolving complaints in an accessible and transparent way. Through this document, we make the commitment to continual quality improvement by taking into consideration the data provided by an effective complaints management system. We will review complaints on an ongoing basis to identify any potential non-compliance and areas for improvement.

2. Definition of Complaint

A complaint is an expression of dissatisfaction that can be received on the basis of products and/or services provided by us or our agents, contractors, and other representatives, or due to perceived inadequacies in the complaints handling process itself.

We will consider all complaints as opportunities to improve, and they will be freely received by telephone, in writing (for example, letter, email, facsimile) or in person.

Complaints may be raised in relation to (amongst other areas), any:

- Failure by us to observe our published or agreed practices or procedures;
- Failure in respect of a product or service offered or provided by us or our representatives;
- An instance where you involve or seek information about a third party, such as the jurisdictional energy ombudsman or a Member of the Parliament; and
- An occurrence where a complaint is directed to us on your behalf by an energy ombudsman.

When a complaint relates to more than a single aspect of our services or products, a separate charge will be recorded for each aspect.

3. Complaints Management

The guiding principles for our complaints management program are contained in AS/ISO 10002-2014 (Customer Satisfaction – Guidelines for Complaints Handling in Organisations).

4. Promoting our Complaints Management Program

We will publish this Standard Complaints and Dispute Resolution Procedure on our website, and it will be actively brought to the attention of customers.

We are committed to promoting and ensuring the visibility of our complaints management program. To achieve this, we will:

- Make this procedure available free of charge;
- Arrange for an interpreter to expound the procedures and facilitate the resolution of complaints;
- Make special arrangements for people with disabilities, ensuring that they and their advocates have access to this procedure and are aided in the resolution of their complaint. The process and other documentation will be available in large print Braille or audiotape on request; and
- Ensure that all relevant staff members are trained to resolve complaints and have access to resources for cross-cultural communication and communication with customers with special needs.

5. Responsiveness

Once a complaint has been received, one of our personnel will immediately acknowledge the complaint and prioritise it for resolution. Higher priority will be given to those complaints where there is perceived financial hardship, the disconnection of energy supply, and matters relating to health and safety. In such instances, we will respond as soon as possible.

In all instances, we will

- Freely accept complaints lodged on our website, in person, or by telephone, facsimile, email, or letter;
- Acknowledge any complaint received as soon as possible;
- Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
- Keep you updated about the investigation and any proposed resolution;
- Notify you as soon as possible of the outcome of our investigation and any proposed resolution; and
- Provide you with the option of an internal review of your complaint if you are unsatisfied with the outcome of the investigation or the proposed resolution.

6. Responsibilities

All of our staff must comply with this procedure as well as the Retail Law and Retail Rules and any Guidelines or Procedures published by the Australian Energy Regulator (AER) or the Australian Energy Market Operator (AEMO). Complaints can be made to any Powow Power employee or contractor. That employee or contractor is then required to report any complaints received to the Customer Service Manager.

All employment contracts will stipulate that employees are obligated to report on any suspected compliance breaches. We will ensure that complaint management is not hindered by a lack of resources. We will also ensure that adequate programs are in place to train staff in complaint resolution and the implementation of this procedure.

Top-level management of Powow Power is responsible for:

- Establishing the complaints management program;
- Establishing and implementing the process of complaints management;

- Allocating resources to ensure compliance with obligations under applicable laws and this procedure;
- Promoting and advocating a customer-centric approach to complaint resolution;
- Reporting to the board on the management of complaints, including the number and nature of complaints received;
- Continually reviewing the effectiveness of the complaints management program, including the program's processes; and
- Establishing an adequate training program to ensure all relevant staff, agents, contractors, and other representatives comply with this procedure.

7. Recording Complaints

Complaints are recorded in our customer management system as soon as they are received. Complaints and all relevant information will be recorded, and a unique identifier will be provided. Each recording will include:

- Your requested resolution
- The date of your complaint
- A description of your complaint
- The expected date for a response or resolution
- The established priority of your complaint

More than one complaint can be made per customer/call. For example, if a customer makes a billing complaint and then makes a marketing complaint during the same call, two complaints will be recorded. Each individual customer contact with a complaint will be recorded and categorised as one, irrespective of the number of times a caller has contacted us on an issue.

Complaints will be tracked from the time they are received to their resolution. When tracking the resolution of complaints, we will make sure to meet response deadlines. We will keep you informed and updated regularly throughout the process.

8. Monitoring and Improving

Complaints will be tracked at individual and group levels. Any systemic issues that are identified will be brought to the attention of the Compliance Committee and Board during their monthly meetings.

Powow Power's board will direct top-level management to address systemic issues that are identified during a complaint process.

9. A Customer's Right to Complain

As a customer, you have the right to lodge a complaint at any time. Once your complaint is received, it will be dealt with in accordance with this procedure.

10. Internal and External Escalation

At any time, you may request an internal escalation of your complaint, which will be granted. Complaints will also be escalated where they are complex, urgent, or sensitive. When your complaint is received, you will be informed that you have the right to escalate it if you are dissatisfied with the process. Individual staff who manage complaints will be required to review the complexity, urgency, and sensitivity of all complaints and seek assistance from a supervisor or specialist where required.

If you are not satisfied with our response to your complaint or you wish to seek independent advice about a complaint, we will notify you that you can contact the Energy Ombudsman in your State.

We will provide the contact details for the Energy Ombudsman schemes and will assist you in lodging a complaint with them.

11. Our Commitment to Customers

In all instances, we will:

- Treat you with respect;
- Take your complaint seriously;
- Respect your privacy;
- Manage your complaint with impartiality;

- Properly investigate and report on your complaint;
- Resolve your complaint with proper consideration to facts;
- Provide the option of internal escalation or a referral to an energy ombudsman scheme when requested or appropriate; and
- Ensure equal access to our complaints management program and fair resolutions.

You have rights under various laws, including the Competition and Consumer Act 2010 (Cth), and the Energy Law. We will ensure that those rights are respected.

12. Customer Read Estimates

If you are a "small customer" with an accumulation meter, you have the right to conduct your own meter reading if your bill is based on an estimate. This self-read is known as a "customer read estimate." You can find more information on customer read estimates [here](#).

Where we have not accepted a customer read estimate, we will notify you of the reasons for the decision and allow the opportunity to rectify the self-read.

We will deal with complaints regarding customer read estimates in accordance with our standard complaints process, which is outlined in this procedure.

13. Contact Us to Lodge a Complaint

You may contact us at any time to lodge a complaint using the following contact details:

Our contact details:

Interpreter: 131 450 - For help using an interpreter, visit TIS.

NRS: 133 677 - For help using this service, visit NRS.

14. Contact details for the Energy Ombudsman Schemes

If you are not satisfied with our response or investigation into a complaint, you may contact the Energy Ombudsman in your state. We will provide you with the contact details of your Energy Ombudsman if needed.

Translating and interpreting service (TIS):131 450

Post: GPO Box 2947 Adelaide SA 5001

Office address (strictly by appointment only): Level 11, 50 Pirie Street Adelaide SA 5000

Online: <https://ewosa.com.au/submit-a-complaint>

Energy and Water Ombudsman of NSW

By Post: PO Box 1343, Haymarket NSW 1240.

Freepost: Reply Paid 86550, Sydney South NSW 1234.

Free call: 1800 246 545

Free fax: 1800 812 291

complaints@ewon.com.au

Interpreter: 131 450 - For help using an interpreter, visit TIS.

National Relay Service: 133 677 - For help using this service, visit NRS.

Energy and Water Ombudsman Queensland

Freecall: 1800 662 837

Translation services: 131 450 - For help using an interpreter, visit TIS.

National Relay Service: 133 677 - For help using this service, visit NRS.

Fax: (07) 3006 2670

Online: <http://www.ewoq.com.au/submit-a-complaint>

Email: complaints@ewoq.com.au or info@ewoq.com.au

In person: Level 16/53 Albert Street, Brisbane City QLD 4000

Energy and Water Ombudsman South Australia

Freecall: 1800 665 565

National relay service: 133 677