



**elysian energy**

Saving on **power** made easy

**AER Electricity Retail  
Authorisation Application**



## Executive Summary

This is an application by Elysian Energy for an electricity retailer authorization under the National Energy Retail Law (Retail Law). Elysian Energy is an Australian owned independent start-up retail business focused on providing competitive pricing for residential and business customers.

**Our mission is:**

### *Simple Plans, Everyday Savings.*

and that our prices are always competitive. This is achieved using systems and processes which (regularly?) review available offers and ongoing analysis to ensure our tariffs are competitive.

In addition, we ensure that the transfer and connection process is as simple as possible for our customers. We have invested in systems to ensure that market transactions occur efficiently, ensuring our customers receive a cost-competitive, reliable and hassle-free experience.

We are approachable and will give customers a "fair go". Switching to and using our service will be simple and will provide the best value monthly bills.

We have developed robust compliance systems and governance oversight to ensure that our compliance and reporting obligations are met.

Our business plan and financial model have been stress tested to ensure that our business is sustainable, and we have engaged a highly reputable marketing firm to assist with our market offering.

We are excited to join the National Electricity Market. Our future customers will benefit from our innovative tariffs and the customer service we offer.



## Contents

	<b>Executive summary</b>	1
<b>1</b>	<b>Introduction</b>	4
1.1	Retail Law objectives	4
<b>2</b>	<b>General Particulars</b>	6
2.1	Applicant details	6
2.2	Nominated contact	6
2.3	Application details	6
2.4	Nature and scope of operations	6
2.5	Jurisdictions	7
2.6	Type of customers supplied	7
<b>3</b>	<b>Organisational and technical capacity</b>	8
3.1.	Previous energy retailer experience	8
3.2.	Organisational structure and employee numbers	8
3.3.	Management team summary	9
3.4	Service partners	11
3.5	Business plan	13
3.6.	Compliance Strategy	13
3.6.1.	Compliance obligations knowledge	13
3.6.2.	Meeting obligations	13
3.6.3	Dispute resolution	14
3.6.4.	Skills gap	14
3.7	Risk management strategy	15
3.8	External assurance process for compliance and risk management strategies	15
3.9	Retail Law compliance	15
3.10	Ombudsman scheme membership	16
3.11	Approvals and authorisations	16
3.11.1	AEMO registration	16
3.11.2	ASX Austraclear participation	16
3.11.3	ASX futures	16
3.11.4	Distribution Business: Use of System	16
3.11.5	Concessions	17
3.11.6	Clean energy and renewables	17
<b>4.</b>	<b>Financial Viability</b>	18
4.1.	Current financial position	18
4.2.	Corporate Structure	18
4.3.	Financial Support	18
4.4.	Credit support obligations	18
4.5.	Declaration of going concern	19
4.6.	Revenue forecast	19
<b>5.</b>	<b>Suitability</b>	20
5.1	Compliance history	20
5.2	Outstanding proceedings	20
5.3	Criminal history checks	20
5.4	Declaration as to bankruptcy and disqualification from management	20
5.5	Names and address of offices	20
5.6	Policies and procedures addressing probity and competence	21

## Attachments

No.	Title
1	Compliance and Risk Charter
2	Market retail contract terms and conditions
3	Complaints and dispute resolution policy
4	Complaints and dispute resolution procedure
5-7	Intentionally blank

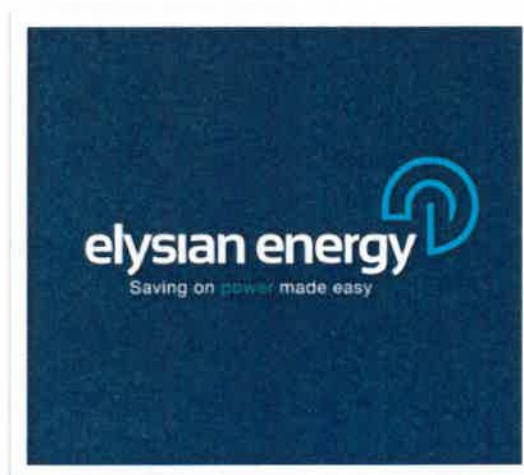
## Confidential Attachments

8	Elysian Energy Tariff model
9	Key Messaging Guide
10	Directors and managers background
11	Advisory Committee Charter
12	Marchmont Hill Consulting agreement
13	Agility CIS agreement
14	Marketingeye agreement
14a	CQ Partners
14b	Outsourcing Policy
15	Business Plan
16	Financial model
16a	Financial model – Zero growth
17	Forecast and Assumptions included in the Financial Model
18	Retail Compliance Policy
19	Retail Compliance Procedure
20	Register of Compliance Obligations
21	External Assurance Process for Compliance and Risk Management Strategies
22	Risk Management Policy
23	AEMO intending market participant
24	Austraclear special purpose participant
25	Wholesale Energy Risk Plan
26	Financial Statements
27	Corporate structure
28	Evidence of financial support provided by Directors
29	Statutory declaration: Going Concern from Managing Director
30	Statutory declaration from Financial Institution
31	Declaration as to bankruptcy and disqualification from management
32	Names and Address of Offices
33	HR & Training Policy for Employees
33	Statutory Declaration Regulatory
34	Statutory Declaration Legal

## 1. Introduction

Elysian Energy Pty Ltd (Elysian Energy) is a privately owned Australian proprietary company aiming to offer retail electricity services in the National Electricity Market.

The founders of Elysian Energy have invested significant time and resources analysing the current state of the National Electricity Market and opportunities within it. There is dissatisfaction amongst energy consumers, particularly those on standard retail contracts who are not receiving the best rate available. This presents an excellent opportunity for Elysian Energy to provide a better and fairer value offering to consumers. The Australian energy market is currently characterised by the dominance of vertically integrated retailers who have captured the clear majority of residential and business customers, to the disadvantage of those seeking a better deal. Introduction of a new competitor to the existing retail businesses will benefit consumers.



Elysian Energy will be a positive addition to the National Electricity Market, adding another choice for consumers. This authorisation application outlines the knowledge, skills and capability of the Elysian Energy team and its partners as well as providing information in relation to its financial backing.

### 1.1. Retail Law Objectives

The authorisation of Elysian Energy's electricity retail application will be consistent with the National Energy Retail Law (Retail Law) objective: to promote efficient investment in, and efficient operation and use of, electricity services for the long term interest of energy consumers with respect to price, quality, safety, reliability and security of supply of electricity (Section 7 of the Retail Law).

At Elysian Energy, our mission is "Simple plans, Everyday savings". We have constructed innovative tariff models that are competitive and will ensure that electricity consumers are able to access fair prices.

The recent "Power of Choice" changes have made our new innovative tariff model possible. Further information on Elysian Energy tariff models is included in **Confidential Attachment 8**.



Elysian energy's market tariff model includes the following features that benefit electricity consumers:

- **Zero percent discount:** Elysian Energy offers competitive prices to all its customers regardless of whether they are new customers, shopping around or existing customers. Therefore, loyal customers do not get penalized.
- **Zero tricky terms:** Customers do not get caught out at the end of a contract term and lose discounts.
- **Competitively priced:** Elysian Energy plans offer prices that are competitive in the market.
- **Energy targets to control costs:** Customers are provided with information on consumption to help them control costs via email or SMS.
- **Only pay for what you use.** Customers are in control of more information to help control usage and costs.

The dominant energy distributors rely on customer inertia to charge higher prices. Elysian Energy will not be charging this "lazy tax" to the customer as every customer will be moved to the best available plan for them. This will be achieved by continual analysis of the offers available to our customers, and ongoing review of the retail electricity market offers to ensure that our tariffs are always competitive.

Elysian Energy's customers will never end up in a situation where they are supplied a standard retail contract at a rate that is higher than an otherwise available market offer from Elysian Energy. This will be our unique selling position, a promise to customers that is currently unmatched in the marketplace.

More detail on our unique proposition is included in our Key Messaging Guide in **Confidential Attachment 9**.

This move away from charging customers different rates based on how engaged they are with the retail market will not only benefit Elysian Energy customers but will also benefit the market as competing retailers are forced to respond to our fair pricing policy. This is to the long-term benefit of all electricity consumers.

Elysian Energy is investing in process and systems with established service providers to ensure that the customer transfer and connection process is as smooth as possible. This will ensure that the market operates efficiently.

## 2. General Particulars

### 2.1. Applicant details

**Legal Name:** Elysian Energy Pty Ltd  
**ABN:** 85 617 526 333  
**Registered Address:** Level 10, Tower 4, 611 Flinders Street, Docklands, Victoria  
**Address for Correspondence:** Level 10, Tower 4, 611 Flinders Street, Docklands, Victoria

### 2.2. Nominated contact

**Name:** Scott Wells  
**Title:** Managing Director  
**Telephone:** 03 8630 2825  
**Email:** scottwells@elysianenergy.com.au

### 2.3. Application details

**Date:** 16 October 2018  
**Authorisation sought:** Electricity Retail Authorisation  
**Timing:** Elysian Energy intends to provide services in April 2019

### 2.4. Nature and scope of operations

Elysian Energy's vision is to simplify the way Australians use energy, by revolutionising the way they pay for their energy in the form of a monthly plan. This new style of payment ensures that customers can easily manage payments and energy usage.

We are an innovative Australian electricity company that uses a telco-style tariff model, where users sign up to a plan, and are kept informed of their electricity use throughout the month. They can also log into their account online and see how their usage is tracking for the month. We have a variety of plans to suit different households, with different energy requirements. We also ensure everyday low prices – there's no low costs to hook people in, with rising prices in the months to come. Our aim is to ultimately help everyday Aussies save on their electricity.

As a low-cost entrant into the National Electricity Market, Elysian Energy will focus on winning mass market customers with its competitive pricing and service offer.

## 2.5. Jurisdictions

Elysian Energy proposes to retail electricity in all National Electricity Market (NEM) jurisdictions, namely: Victoria, New South Wales, Queensland, Australian Capital Territory, South Australia and Tasmania. Elysian Energy is currently licenced by the Essential Services Commission for the purpose of electricity retail in Victoria.

Initially Elysian Energy will focus retail activities in Victoria, South Australia, New South Wales, and Queensland.

## 2.6. Type of customers supplied

Elysian Energy proposes to retail electricity to residential, and small to medium sized non-residential customers (as defined by section 6 of the Retail Law).



### 3. Organisational and Technical Capacity

In this section Elysian Energy demonstrates it has the technical expertise, knowledge and skills to operate an Electricity Retail business. As a low-cost start-up electricity retail business, Elysian Energy does not currently have a large number of staff but obtains the requisite skills and experience from its Directors, Advisory Committee and Service Partners to ensure the highest quality compliance and service is provided to its customers.

#### 3.1. Previous energy retailer experience

Elysian Energy is a startup independent Australian electricity retail business. At the time of submission Elysian Energy holds an Electricity Retail Licence with the Essential Services Commission and expects to provide Electricity retail services in the first quarter of 2019 in Victoria.

The Elysian Energy management team (See section 3.3) have decades of experience in the energy and finance industries, and specifically, they have experience in:

- a) Development of the electricity market
- b) System and process experience
- c) Regulatory markets
- d) Strong business development background
- e) Significant depth of experience in finance and corporate governance

In addition to the experience of the management team, Elysian Energy can leverage the experience of its Service Partners (see section 3.4).

#### 3.2. Organisational structure and employee numbers

Elysian Energy is structured to focus on the requirements of a successful energy retail business. The organisational structure, CVs and detailed backgrounds for key members of the board, committees and management are available in **Confidential Attachment 10**.

Small staff numbers enable Elysian Energy to provide competitive pricing in the market. While our staff numbers are low, we do have access to the skills and resources of our Service Partners (as outlined in section 3.4 of our submission).

### 3.3. Summary of management team

#### Managing Director - Scott Wells



The management team is headed by Scott Wells, Managing Director and founder of Elysian Energy.

Scott has a background in business leadership in the Australian energy and telecommunications industries. As Managing Director of Elysian Energy, Scott is focused on establishing the business operations and regulatory compliance.

Before joining Elysian Energy, Scott managed the commercial function of the NBN for the aerial infrastructure roll-out. As one of the first employees at the NBN, Scott was critical in establishing key contracts and relationships with the energy industry to support the NBN roll-out.

Prior to the NBN, Scott held senior positions in the energy industry servicing some of Australia's most important energy businesses as well as consulting to industry and regulators. Scott has also consulted on electricity market systems projects including the establishment of full retail contestability and smart metering systems.

Scott began his career as a Chartered Accountant with early positions at KPMG. Scott has a Bachelor of Business and a Masters of Business Administration and is a Fellow of Chartered Accountants, Australia and New Zealand.

#### Director Retail Sales and Marketing – Christina Kortesis



Christina is a results-driven marketing leader with over 15 years experience in developing, managing, branding, and thought-leadership strategies that surpass aggressive goals. She has a passion for building marketing campaigns, educating SMEs on modern marketing strategies, while developing and motivating others.

Christina's background across SMEs and experience in marketing and business development help to deliver cost effective results-driven marketing solutions. Christina holds a Bachelor of Business, Marketing from Monash University.

### Finance Director - Karen Wells

Karen has more than 20 years' experience as a chartered accountant specialising in risk management, financial audit, accounting, internal audit and process innovation. As Finance Director of Elysian Energy, she is focused on risk management, governance and compliance.

Karen has a demonstrated ability to rapidly identify and interpret business risks, key drivers and environmental factors that influence organisational performance.

Karen has a proven track record of contributing to group decision making and strategy development.

Karen is currently the Director of Professional Standards at HLB Mann Judd and has significant board and governance experience including:

- Current independent member of Ambulance Victoria, Finance Committee
- Former independent member of Ambulance Victoria, Audit Committee
- Former Board Member in the Victorian Health sector



### Director Compliance and Operations - Bruce Macfarlane

Bruce's most recent energy retail experience was as founder of BidEnergy (ASX.BID) an energy procurement and bill management application. Bruce was responsible for setting up and managing the operations function both onshore and offshore. He established BidEnergy's procurement function where energy retailers from Australia, New Zealand, UK, and USA provide dynamic offers to multi-site corporate customers. Bruce also set up and managed energy retailer invoice processing allowing the BidEnergy platform to mine bill data to create payment and accrual files, and cost reduction reports.



Prior to BidEnergy, Bruce worked at AGL on the SAP implementation as part of their leadership team and consulted to Origin Energy during their later SAP implementation.

Bruce's career in energy started in 1999 as an energy derivatives trader for Genesis Power in New Zealand, moving to Australia to work in CapGemini's energy practice. Bruce has a Bachelor of Engineering (Mining) and a Masters of Commerce (Economics).

## Advisory Committee

Elysian Energy has developed an Advisory Committee to provide the Board and Executive Team with objective insight, advice and recommendations on a range of business matters from Advisory Committee members that have significant industry, commercial or leadership expertise (refer Advisory Committee Charter included in **Confidential Attachment 11**). The first two external members of the Advisory Committee bring significant experience to Elysian Energy:

### Phil Craig

Phil previously led Origin's retail business, responsible for all aspects of the Retail division including Strategy, Marketing, Brand, Sales, Service, Operations, Business Development and interface with Government and Media. Phil's most recent role was as Origin Energy's Executive General Manager Corporate Affairs, where he had responsibility for Origin's brand and reputation, government and media relations, policy development and sustainability, and the Origin Foundation.

### Stuart Marburg

Stuart is one of Australia's internet pioneers with a deep understanding of how to market utility services to mass market customers. Stuart co-founded Netspace in 1992 and he is currently CEO of Call Dynamics.

## 3.4. Service Partners

Elysian Energy's approach to its business is that our executive team has significant skills in governance, they are supported by external consultants with experience in the industry and the work load is either supported by the Managed Service Agreement or by the small team of staff (refer Out Sourcing Policy included in **Confidential Attachment 14b**). This enables scalability of the Elysian Energy business model.

Elysian Energy is employing an outsourcing model for the provisions of customer billing and support services. Our service providers are established providers in the energy retail service industry and currently supply numerous Australian energy retail businesses, both big and small. Our Key Service providers are:

### Marchmont Hill Consulting

Marchmont Hill Consulting (MHC) will provide regulatory advisory and compliance services. Since its formation 14 years ago, MHC has worked with a range of market participants and stakeholders on policy and regulatory issues relating to disruptive technologies and energy market transformation. MHC's Policy and Regulation practice can provide flexible advisory services to support Elysian Energy's Operations and Compliance Manager.

Key individual:

**Sarah Paparo** – Sarah commenced her career as a trade practices solicitor at Freehills and subsequently worked in commercial and policy roles at Origin Energy. Most recently she has been in London working for the UK government on energy market reform. Sarah holds a BSc, LLB(Hons) and LLM in competition and market regulation.

The MHC signed agreement is included in **Confidential Attachment 12**.

### **Agility CIS**

Agility CIS is an established Managed Service provider in the Australian energy market. Agility will use their Engage billing and CRM system to provide managed services to Elysian Energy, including billing and contact center resources required to ensure we have sufficient staff to meet our obligations.

Agility CIS provides cost effective billing and customer management solutions to companies on a global scale with customer bases from 1,000 to 1,000,000. Over two million residential and commercial customers are billed using Agility systems.

The Agility CIS signed agreement is included in **Confidential attachment 13**.

### **Marketingeye**

Marketingeye is a leading marketing consultancy company for small to medium-sized businesses and has experience in marketing in the energy industry. Marketingeye provides strategic marketing initiatives, generating leads and sales while establishing a prominent brand presence. **Marketingeye's services will be important in the acquisition of customers.**

Marketingeye provides Elysian Energy with a consulting team that is trained in all facets of the marketing mix, to provide the right advice and marketing strategy to achieve Elysian Energy's goals.

For details of the terms of our key service partner agreements please refer to **Confidential Attachment 14**.

### **CQ Partners**

CQ Partners is an energy market advisory firm specialising in providing advice and services in the Australian Energy market. CQ Partners was established in 2008 to provide corporate advice and services in electricity, gas and renewables.

CQ's founding partners have worked as a team for over a decade and each is an industry expert with over 15 years of experience in the Australian energy and financial markets. The partners are supported by a team of highly regarded and experienced energy industry practitioners. The extensive experience and expertise combined with a focus on commercial solutions is why CQ Partners is recognised as one of the leading energy advisory firms in Australia.

CQ Partners will provide strategic advice in relation to energy trading plans, portfolio optimisation, derivative and contract evaluation and market trend analysis. This will include a high-level strategy to manage Elysian Energy's wholesale risk, a specific hedging strategy including types of hedging instruments and an implementation strategy. CQ Partners will then assist with the implementation of the strategies and report on cost of energy, coverage and prepare risk management documentation.

For details of the proposed terms of our key service partner agreements please refer to **Confidential Attachment 14a**.

### 3.5. Business Plan

Elysian Energy's Business Plan is attached in **Confidential Attachment 15** and includes information in relation to sales and marketing strategy, revenue, costs and customer acquisition targets. The business plan includes information in relation to strategic direction and objectives. A financial model supporting the Business Plan is attached in **Confidential Attachment 16** and a zero-customer growth model is included in **Confidential Attachment 16a**. The forecasts and assumptions included in the financial model are outlined in **Confidential Attachment 17**.

Elysian Energy's management team has relevant financial management experience and will closely monitor progress relative to the business plan to ensure that the company's goals are met.

### 3.6. Compliance strategy

#### 3.6.1. Compliance obligations knowledge

Elysian Energy's team, its board and suppliers, have significant experience in retail electricity compliance. Elysian Energy's compliance policy and the oversight of its compliance by the Compliance and Risk Committee ensure that Elysian Energy has the capacity to comply with all electricity regulatory requirements including those under the Retail Law and Retail Rules and other applicable codes and guidelines.

As part of this submission Elysian Energy has provided its Retail Compliance Policy (**Confidential Attachment 18**), Retail Compliance Procedure (**Confidential Attachment 19**) and a Register of Compliance Obligations (**Confidential Attachment 20**).

Elysian Energy compliance policy is consistent with the objectives of the Australian Standard on Compliance Programs AS 3806-2006 and the principles of commitment, implementation, monitoring and continual improvement.

We have also engaged RSM to complete an Independent Assurance Report on the effectiveness of our compliance and risk management strategies (please refer to **Confidential Attachment 21**).

Elysian Energy has formed a Compliance and Risk Committee which is focused on regulatory compliance, business risk and the management of its wholesale market risk. This committee meets regularly to review current regulatory compliance and outstanding wholesale market risk. The Compliance and Risk Committee is made up of members of the Elysian Board of Directors. A copy of the Compliance and Risk Committee's Charter is included in **Attachment 1**.

#### 3.6.2. Meeting obligations

The Compliance and Risk Committee oversees Elysian Energy's compliance reporting obligations in line with the National Energy Customer Framework. Elysian Energy has identified all obligations applicable to our retail energy business and have included them in a compliance calendar,



documents registry, task list and compliance registry. This approach will assist any audit activity that the AER may wish to conduct.

Compliance and governance are key skills of the business and is required in all areas of the business operations and as set out in the Compliance and Risk Charter (**Attachment 1**). This activity is supported by the Director Compliance and Operations as well as the directors of Elysian Energy.

Our external advisors, Marchmont Hill Consulting, are available to provide advice on compliance issues. Marchmont Hill Consulting also provides training for Elysian Energy's directors and staff on compliance matters.

Elysian Energy's Operations and Compliance Director monitors and reports on Elysian Energy's compliance obligations and overseas compliance obligation undertaken by third parties. The compliance team, led by the Operations and Compliance Director, reports to the Compliance and Risk Committee who are responsible for Elysian Energy's compliance. A copy of the Compliance and Risk Charter is included in **Attachment 1**. The current members of the Risk and Compliance Committee are Scott Wells, Karen Wells and Bruce Macfarlane

### 3.6.3. Dispute resolution

Elysian Energy has a Complaints and Disputes Policy (refer **Attachment 3**) and Complaints and Disputes Procedure (refer **Attachment 4**) designed to quickly resolve all issues and includes information on how to contact Elysian Energy.

Elysian Energy's Customer Relationship Management system will be used to track all correspondence with customers to allow for swift resolution and reporting of customer complaints.

### 3.6.4. Skill gaps

Elysian Energy will provide adequate resources in order to ensure compliance, including the appointment of the Director Operations and Compliance. Resources will be allocated as required to ensure that systems and processes remain compliant and any skill gaps are identified. Compliance personnel are the staff responsible for overseeing the day-to-day implementation and maintenance of the Policy and the Compliance Management System. Their activities include the following:

- a) Training;
- b) Creating and updating policies;
- c) Meeting with external consultants;
- d) Meeting with Marketing to review mailing pieces; and
- e) Risk and Compliance Committee meetings, preparing agendas and taking minutes.

Elysian Energy, as part of its Compliance Procedure, regularly obtains advice on compliance and legal issues from a number of external consultants.

In addition, Elysian Energy conducts audits of its Compliance Policy and Compliance Procedure and completes annual reviews of its legislative compliance. Outcomes are incorporated into Elysian Energy's Compliance Policy, Compliance Procedure and compliance training program.

### 3.7. Risk management strategy

Elysian Energy's Risk Management Policy has been developed in accordance with the *AS/NZS ISO 31000:2018 Risk Management- Principles and Guidelines*. Elysian Energy's focus on risk management aims to improve the identification of opportunities and threats and effectively allocate and use resources for risk treatment. Elysian Energy has a framework for management of material business risks, a governance system and monitors the internal controls required to mitigate business risk. Further detail on the Risk Management policy is included in **Confidential Attachment 22**.

### 3.8. External Assurance Process for Compliance and Risk Management Strategies

RSM Australia have been engaged to perform a review of Elysian Energy's compliance and risk management systems and processes. Details of RSM Australia's findings are include in **Confidential Attachment 21**.

The scope of RSM Australia's work included:

- Review of all relevant documentation in relation to Elysian Energy's risk management and compliance strategies including:
  - Risk management policy
  - Compliance policy
  - Risk management processes
  - Compliance related reports
- Targeted discussion with stakeholders to clarify questions and discuss findings
- Walkthrough of key risk and compliance processes

### 3.9. Retail law compliance

Elysian Energy has developed the following customer contracts in line with the Retail Law:

#### ***Standing Retail Contracts:***

Elysian Energy will use the model offer terms and conditions set out in Schedule 1 of the Energy Retail Code as the basis for its standing offer contract.

#### ***Market Retail Contract:***

Elysian Energy's market retail contract terms and conditions are included in **Attachment 2**. The terms and conditions comply with the applicable regulatory requirements. The terms and conditions will be provided to each new customer, and they will be available for free download from the Elysian Energy website.

### 3.10. Ombudsman Scheme membership

Elysian Energy will become a member of relevant Ombudsman schemes for the states in which it operates and expects its membership will be granted on the completion of the Retail Authorisation. The following is a list of schemes that Elysian Energy will join before it sells in each state:

- a) Energy and Water Ombudsman Queensland
- b) Energy & Water Ombudsman NSW
- c) ACT Civil and Administrative Tribunal
- d) Energy Ombudsman South Australia
- e) Energy Ombudsman Tasmania

### 3.11. Agreements with other market participants

#### 3.11.1. AEMO registration

Elysian Energy is currently registered as an intending market participant with AEMO, (refer **Confidential Attachment 23**) and is working within the AEMO pre-production environment as part of our system implementation. Elysian Energy has commenced the application process with AEMO to become a registered customer market participant in the NEM. The application will be finalised on the granting of a Retail Electricity Authorisation.

#### 3.11.2. ASX Austraclear participation

Elysian Energy is a special purpose participant in Austraclear to allow for the settlement of electricity transactions within the NEM (refer **Confidential Attachment 24**).

#### 3.11.3. ASX futures

Elysian Energy has engaged ICAP as its ASX energy broker and is in discussion with an ASX clearing house provider to provide services in the delivery of Elysian Energy's Wholesale Energy Risk Plan (refer **Confidential Attachment 25**).

#### 3.11.4. Distribution Businesses: Use of Systems

Elysian Energy has engaged with distribution businesses and expects to conclude the standard UoS agreements with each of the distribution business in the areas that Elysian Energy will retail electricity in after the issue of the Electricity Retail Authorisation.

#### 3.11.5. Concessions

Elysian Energy will make arrangements in each jurisdiction it operates to ensure that eligible customers receive applicable concessions.

#### 3.11.6. Clean energy and renewables

Elysian Energy will register with the Clean Energy Regulator in advance of market entry to meet its obligations for relevant small-scale certificate and energy efficiency schemes.

## 4. Financial Viability

In this section Elysian Energy demonstrates that it has the financial resources and agreements in place to support its retail electricity business.

### 4.1. Current financial position

Elysian Energy is a start up business and does not currently prepare audited financial reports. Elysian Energy's latest financial statements are included in **Confidential Attachment 26**. The financial report has been compiled with the assistance of our accountants RSM Australia.

### 4.2. Corporate Structure

Elysian Energy Pty Ltd is a privately owned Australian company. Details of the Elysian Energy Pty Ltd ownership structure are included in **Confidential Attachment 27**.

### 4.3. Financial Support

Elysian Energy has sufficient financial resources to sustain a viable business in the electricity industry.

Elysian Energy is provided financial support by its directors and its beneficial owners. Evidence confirming the level of financial support and supporting capacity is included in **Confidential Attachment 28**.

### 4.4. Declarations of going concern

A declaration from the Managing Director of Elysian Energy that it is a going concern with no impediment to its ability to finance its retail activities is included in **Confidential Attachment 29**.

#### 4.5. Financial institution declaration

**Confidential Attachment 30** contains a declaration from our financial institution verifying no insolvency official has been appointed in respect to the business or any property of the business and other required matters.

#### 4.6. Financial Forecast

The financial forecast is included in the business plan model - see **Confidential Attachment 16**.



## 5. Suitability

### 5.1. Compliance history

Below is the compliance history of Elysian Energy and its officers:

- No material failure to comply with regulatory requirements, laws or other obligations
- No licences/ authorisation revoked
- No past or present administrative or legal actions in relation to authorisation, authority or licence
- Never triggered retailer of last resort (RoLR) provisions

### 5.2. Outstanding proceedings

Elysian Energy, its directors, controlling persons nor any of its significant decision makers have any outstanding legal proceedings or regulatory complaints against them.

### 5.3. Criminal history checks

Criminal history checks are available on request for the directors of the business.

### 5.4. Declaration from Management Director

The Managing Director has provided a declaration confirming that to the best of his knowledge the directors, officers and other management staff of Elysian Energy Pty Ltd have not been disqualified from the management of a corporation and there is no record of bankruptcy of the management team, (refer **Confidential Attachment 31**).

### 5.5. Names and address of officers

A list of the names and addresses of officers of Elysian Energy Pty Ltd has been provided (refer **Confidential Attachment 32**).

## 5.6. Policies and procedures addressing probity and competence

Elysian Energy has an extensive Human Resourcing & Training Policy (**Confidential Attachment 33**) which includes sections on:

- Personal conduct
- Recruitment
- Induction
- Training
- OH&S
- Performance Management

Our Code of Conduct applies to all employees and covers the following areas:

- Compliance with Laws and Regulations
- Abiding by our Company Policies and Procedures
- Compliance with Financial Controls and Reporting Requirements

All employees are required to complete mandatory annual training, covering

- Workplace Behavior
- Workplace Health and Safety
- Competition and Consumer Law
- IT Security
- Privacy

All employees routinely complete performance objective setting and are required to undertake performance reviews measuring competence, performance and behavior.

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33	HR & Training Policy for Employees
33	Statutory Declaration Regulatory
34	Statutory Declaration Legal