

Energy Retailer Authorisation Application - Electricity

Humenergy Group

Document Control

Proposal for:

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2/04/2019	Final Rev1	Ben Humphreys	Ben Humphreys	

Company Details

Humenergy Group Pty Ltd
ABN: 15 601 324 387
www.humenergy.com.au

Introduction

1 Introduction

Humenergy Group Pty Ltd (ABN 15 601 324 387), or Humenergy or Humenergy Group, is seeking to become an Authorised Retailer of Electricity within the NEM in the states of Queensland, New South Wales, the Australian Capital Territory, and South Australia.

Humenergy Group Pty Ltd (ABN 15 601 324 387), also Humenergy Group Pty Ltd (ABN 15 601 324 387) t/a RMS Energy Management, will be referred to as Humenergy or Humenergy Group or RMS hereon.

Humenergy is seeking authorisation to purchase electricity at the parent meter and onsell energy to End Users. Humenergy Group **will not** at this stage become a Financially Responsible Market Participant (FRMP) and **will not** participate directly in wholesale markets.

This document details Humenergy's application to become an authorised energy retailer.

1.1 About Humenergy Group Pty Ltd

Humenergy Group is a “behind the meter” specialist energy services provider and is an AEMO accredited Embedded Network Manager (Participant ID HUMENM). Humenergy Group has engineering and energy industry expertise and provides energy solutions and services to Body Corporates, Property Owners/Developers, Governments, and Businesses. The solutions and services include:

- Embedded network solutions and Utility billing services
- Energy procurement
- Commercial Solar PV and energy efficiency solutions
- Consultancy and advisory services

Humenergy was founded in 2014 providing solar, energy efficiency, and energy consulting services to businesses, governments and residential customers. Humenergy Group Pty Ltd (Humenergy Group or Humenergy) acquired RMS Energy Management (RMS) in Sep 2016. RMS is an embedded network and utility billing service provider for strata-titled properties. RMS has provided services to Body Corporates, Property Managers and Property Developers across Queensland, Victoria, New South Wales and the Northern Territory for over 10 years.



1.2 Application Background

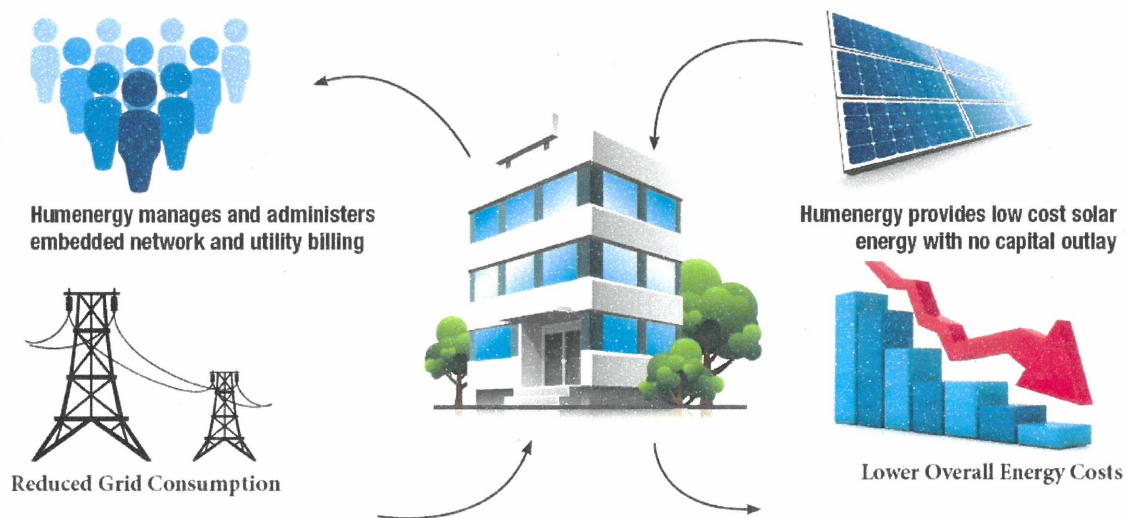
In the embedded network solutions space, Humenergy Group currently provides energy services to Body Corporates and Property Developers/Owners who operate under AER retail and network exemptions delivering End Users lower cost energy and greener energy solutions.

Humenergy Group is seeking to become an Authorised Retailer of Electricity in order to:

- Deliver simpler, lower cost and greener energy solutions
- Improve the quality, End User experience, compliance and risk management of energy onselling in embedded networks/strata communities
- Enhance the range and quality of solutions and services Humenergy Group can deliver
- Integrate solar and related energy efficiency solutions into strata applications where the benefits can be shared amongst many End Users
- Provide employment opportunities and career pathways within the energy industry

The ability to retail electricity within embedded networks will enhance the range and quality of solutions and services Humenergy Group can deliver, as well as enhance the range and quality of solutions Humenergy Group can provide to End Users within the embedded network. In particular the ability to retail electricity will better enable Humenergy Group to integrate solar into strata applications where the benefits of solar can be shared amongst many End Users from community/shared roof space.

For more details regarding Humenergy Group's business model, please refer to Humenergy Group's business plan at Appendix A (provided commercial in confidence), provided on a commercial in confidence basis.



General Particulars

2 General Particulars

2.1 Legal Name

Humenergy Group Pty Ltd

2.2 Your Trading Name

Humenergy Group or RMS Energy Management.

Humenergy Group operates the registered trading name RMS Energy Management for the purposes of utility billing to separate End User communications from corporate related communications.

2.3 ABN or ACN

Humenergy Group Pty Ltd ABN 15 601 324 387

2.4 Registered Business Address and Address for Correspondence

Registered Business Address:

Robertson Scannell Services, 'First Floor' 172 Hume Street Toowoomba Qld 4350

Address for correspondence:

PO Box 10443, Southport BC QLD 4215

2.5 Nominated Contact Person

Ben Humphreys - Managing Director

2.6 Form of energy for which a retailer authorisation is sought

Electricity

2.7 Date you intend to commence retailing energy

Subject to obtaining retailer authorisation, Humenergy intends to commence retailing electricity on or about 1st June 2019.

2.8 Nature and scope of the operations proposed

Humenergy intends to retail electricity via embedded networks in strata communities and similar community properties by purchasing electricity at the parent meter and onselling to End Users.

Humenergy intends to predominately retail electricity within the embedded networks created in residential and commercial strata communities. Humenergy intends to incorporate solar into suitable networks in order to provide lower cost and greener energy solutions.

Over the next 1-2 years, Humenergy intends to commence providing bulk hot water solutions predominately within residential strata communities, and is therefore seeking a retail authorisation for gas. This will be the subject of a separate application.

In addition, Humenergy intends in the future to provide on-market End Users a simple option for combining grid energy and solar energy into one simple bill in order to open up opportunities for residential and commercial tenants and provide simpler solutions for owner occupiers. To clarify in these situations Humenergy only seeks approval to buy grid energy at the on-market meter from an authorised energy retailer and will onsell a mix of grid and solar energy to End Users, and not participate directly in the wholesale market at this stage. Humenergy seeks retailer authorisation in order to commence offering this solution in order to fine tune the product.

As Humenergy already provides comprehensive administration and billing services with regard to energy onselling within embedded networks, Humenergy already maintains the organizational and technical capacity to operate as an energy retailer. The exception is the managing wholesale electricity exposure in the National Electricity Market. However as previously stated, Humenergy is seeking authorisation to purchase electricity at the parent meter and onsell energy to End Users. Humenergy Group **will not** at this stage become a Financially Responsible Market Participant (FRMP) and **will not** participate directly in wholesale markets.

Humenergy will partner with capable and experienced parties for some aspects of the complete solution mainly the supply, installation and maintenance of bulk hot water systems; and electricity and water metering systems.

More detail is included in the *Appendix A - Business Plan (provided commercial in confidence)*.

2.9 Jurisdictions in which Humenergy will retail energy

Humenergy Group seeks retail authorisation to retail electricity in Queensland, New South Wales, Australian Capital Territory, and South Australia. Initially Humenergy will focus its efforts in Queensland where its existing customers primarily are located, and commence operations in NSW.

South Australia and ACT are longer term objectives and Humenergy has no near-term plans to begin energy retailing in these regions. However, Humenergy seeks retailer authorisation now in case business growth and expansion plans exceed expectations.

2.10 Type of customers Humenergy intends to supply

Humenergy intends to exclusively sell electricity to off market customers within embedded networks.

These customers will be a mixture of residential and small commercial, but may include some large commercial customers depending on the size of common areas and the tenant mix.

Humenergy intends in the future to onsell electricity and solar energy to commercial and residential on market customers.

2.11 Former licences held in this and or other jurisdictions

Humenergy has not previously held a retailer authorisation in this or another jurisdiction.

2.12 Previous unsuccessful licence applications

Humenergy has not previously applied for a retailer authorisation in this or another jurisdiction.

2.13 Licences held by associates of the applicant

No associates of Humenergy hold a retailer authorisation in this or another jurisdiction.

Organisational and Technical Capacity

3 Organisational and Technical Capacity

3.1 Details of Humenergy's previous experience as an energy retailer

While Humenergy has not previously been an energy retailer, Humenergy is an experienced energy services provider to embedded networks and already maintains the organizational and technical capacity to operate as an energy retailer, with the exception of managing wholesale electricity exposure in the National Electricity Market.

As an accredited Embedded Network Manager and as an experienced utility billing service provider providing services to Body Corporates and Property Owners operating embedded networks, Humenergy Group has demonstrated experience and capability with regards to providing energy services consistent with the Retail Law and Retail Rules.

Appendix A - Business Plan (provided commercial in confidence).

3.1.1 The date and location of previous operations

Please see *Appendix B (provided commercial in confidence)*. This information is commercial in confidence. Note specific customer identifying information has been redacted from the information provided.

3.1.2 The form/s of energy sold

The forms of energy sold (solar under power purchase agreements) and the type of utility billing services provided (eg electricity, hot water, gas) has been included in *Appendix B (provided commercial in confidence)*.

3.1.3 The scale of operations (including the number and size of customers)

Please see *Appendix B (provided commercial in confidence)*.

3.1.4 A description of how the retail activities were conducted

Appendix A - Business Plan (provided commercial in confidence).

3.2 Details of Humenergy's other relevant retail or energy market experience

Appendix A - Business Plan (provided commercial in confidence).

3.3 Where Humenergy does not have previous energy market experience, how Humenergy intends to bring this experience into the business

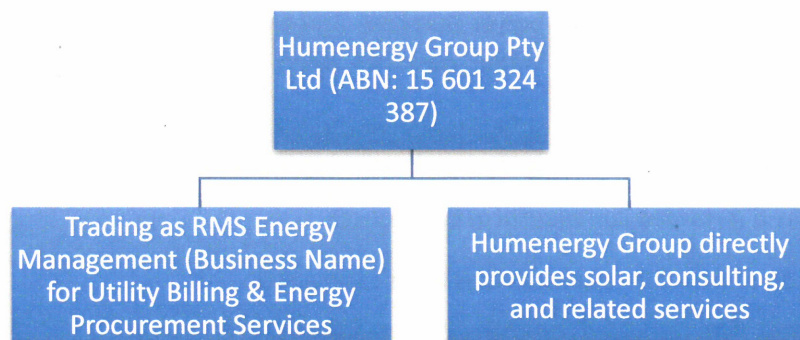
As previously detailed Humenergy Group already maintains the organizational and technical capacity to operate as an electricity retailer, with the exception of managing wholesale electricity exposure in the National Electricity Market.

As at the date of making this application, Humenergy Group intends to predominately retail electricity within embedded networks only. Humenergy Group will not be a Financially Responsible Market Participant (FRMP) for any NMI meter. Contracts with a third party retailer for the supply of energy to the parent meters of the embedded networks or market meters will be executed either by Humenergy Group or by the Body Corporate operating the embedded network, thus obviating Humenergy Group's need to manage wholesale electricity exposure in the National Electricity Market.

Should Humenergy Group broaden its electricity retailing activities such that it does become the Financially Responsible Market Participant for NMI meters, Humenergy Group will seek appropriate authorisation and recruit expertise as appropriate.

Humenergy Group utilises a fit for purpose conventional recruiting process. Each applicant is assessed for competency against the key skills required and has personal referees checked. Humenergy Group specifically recruits employees with high ethical standards and outstanding character references. Humenergy Group's key employees have extensive experience with large, reputable companies.

3.4 Organisation chart showing the structure of Humenergy Group



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

Appendix A - Business Plan (provided commercial in confidence)

3.6 Qualifications, technical skills and experience of your officers, and the relevance of those skills and experience to meeting the requirements of the retailer authorisation

Appendix A - Business Plan (provided commercial in confidence)

3.7 Third Party Services proposed to be utilised by Humenergy

Humenergy Group will in general will use limited Third-Party Services as Humenergy Group already maintains the organizational and technical capacity to operate as an electricity retailer specifically servicing off market customers in embedded networks.

Any Third Party services to be utilised are detailed in *Appendix A - Business Plan (provided commercial in confidence)*.

3.7.1 Functions and activities proposed to be outsourced

Appendix A - Business Plan (provided commercial in confidence)

3.7.2 Summary of the third party's experience in, and knowledge of, the relevant area

Appendix A - Business Plan (provided commercial in confidence)

3.7.3 Evidence of the third party's technical capacity to meet relevant obligations

Appendix A - Business Plan (provided commercial in confidence)

3.7.4 Evidence of controls in place to ensure the third party's compliance with the Retail Law and Retail Rules

Appendix A - Business Plan (provided commercial in confidence)

4 Business Plan

A business plan detailing Humenergy Group's strategic direction and objectives, forecast results and detailed assumptions on how these forecasts were calculated has been included in this application as *Appendix A - Business Plan (provided commercial in confidence)*.

5 Compliance Strategy

Humenergy Group has developed and implemented an Integrated Environmental, Health and Safety, and Quality Management System (IMS), which uses ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 as a framework that allows our organization to document and improve our environmental, health & safety and quality practices in order to better satisfy the needs and expectations of our customers, stakeholders and interested parties.

Humenergy Group has attached the following key documents for managing our energy retailer obligations:

- *Appendix A2 – Integrated QHSE Manual – Appendix A2 (provided commercial in confidence)*
- *Control of Retailer Compliance Obligations Procedure - Appendix C1 (provided commercial in confidence)*
- *Retailer Compliance Obligations Register - Appendix C2 (provided commercial in confidence).*
- *Retailer End User Hardship Policy – Appendix C3 (provided commercial in confidence).*

Humenergy's existing risk management policy and register has been updated to include the additional risks and opportunities created by becoming an authorized retailer. These are attached as *Appendix E1 - Control of Risks and Opportunities Procedure (provided commercial in confidence)* and *Appendix E2 – Risk and Opportunities Register (provided commercial in confidence)*.

An external assurance review of the compliance and risk management systems is being undertaken by a competent and experienced independent third party and will be provided when completed.

5.1.1 Knowledge and understanding of obligations imposed on authorised retailers

As an experienced utility billing service provider, Humenergy Group has demonstrated experience with regards to providing electricity services consistent with the Retail Law and Retail Rules.

For more detail please see *Appendix A - Business Plan (provided commercial in confidence)*.

5.1.2 Meeting retailer authorisation obligations and statutory, industry and technical requirements

The *Control of Retailer Compliance Obligations Procedure* details how the following will be achieved:

- Identifying compliance obligations
- Monitoring compliance to obligations
- Reporting and addressing compliance breaches
- Review and improvement of compliance systems

The *Retailer Compliance Obligations Register* identifies in detail Humenergy Group's future compliance obligations as an authorised retailers under the Retail Law and Retail Rules and applicable statutory, industry and technical requirements of the jurisdictions in which Humenergy intends to operate. Humenergy's IMS provides the system and process for managing and administering all HSEQ obligations including compliance

5.1.3 Complaint and dispute resolution procedures

Humenergy Group's Control of Retailer End User Complaints & Dispute Procedure has been developed in accordance with Australian Standard AS ISO 10002-2006 (Customer satisfaction—Guidelines for complaints handling in organisations) and is provided in *Appendix D (provided commercial in confidence)*.

As a utility billing service provider, complaint and dispute resolution is a key service that Humenergy Group provides its existing customers.

5.1.4 Filling Skills and Knowledge Gaps

There are no known skills and knowledge gaps. However, further staff training and compliance familiarisation will be carried out to further advance our current knowledge and skills.

Humenergy currently provides accredited Embedded Network Manager services, electricity supply agreement administration, utility billing services, call centre services, meter reading services and energy procurement services. Currently Humenergy provides these services on behalf of the Body Corporate and Property Managers/Developer who operates under and in compliance with AER retail and network exemptions.

5.2 Risk Management Strategy

A copy of Humenergy Group's risk management strategy is included as *Appendix E (provided commercial in confidence)*. The risk management strategy covers both operational and financial risks.

Humenergy is not seeking to become a Financially Responsible Market Participant (FRMP) and **will not** participate directly in wholesale markets.

5.3 Evidence that your risk management and compliance strategies have been subject to an external assurance process (for example, an external audit)

An external assurance review of the compliance and risk management systems is being undertaken by a competent and experienced independent third party and will be provided when completed.

Humenergy's IMS have not been external audited, but it has been developed to be compliant with ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. The risk management and compliance strategies are part of the Integrated Management System.

5.4 Any additional information which demonstrates your ability to manage risk and operate in accordance with the Retail Law objective, particularly the long term interests of consumers (for example, copies of any retail contracts that you have developed)

The National Energy Retail Objective as stated in the National Energy Retail Law (NERL) is:

“to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy.”

Humenergy Group has a track record of providing services and advice in the long term interests of consumers, providing businesses with end-to-end energy solutions at significant discounts to retail electricity rates, working to optimise and give businesses control over their energy contract through intelligent and strategic tendering for electricity and gas and delivering smart, tailored solar power systems that immediately lower energy bills.

Humenergy Group understands that energy is an essential service for all customers and that some residential customers may on occasion fall into financial hardship. As a utility billing service provider, Humenergy has experience developing payments plans for customers in financial hardship.

A copy of the retail contracts used for off market customers within embedded networks is included as *Appendix F (provided commercial in confidence)*.

5.5 Evidence of any membership, or steps taken to obtain membership, of a recognised energy industry ombudsman scheme in the jurisdiction/s in which you intend to retail energy to small customers

Humenergy Group will initially focus on the Queensland markets. In the event that its retail authorisation application to the AER is successful, Humenergy Group will contact and register with the Ombudsmen for each particular jurisdiction, prior to commencing operations within those states.

Initial correspondence with the QLD Ombudsman & NSW Ombudsman are attached as *Appendix G (provided commercial in confidence)*.

5.6 Agreements / arrangements in place with key market players within the jurisdictions in which Humenergy intends to operate

Humenergy Group intends to only onsell energy within embedded networks. As Humenergy Group will only be selling energy to customers within embedded networks, Retailer of Last Resort (RoLR) Scheme under Part 6 of the National Energy Retail Law is not applicable to its operations.

Humenergy Group's business model is relatively low risk compared to electricity retail businesses that are exposed to the wholesale electricity market and the fact that the retailing of energy within embedded networks is a supplementary service to the core utility billing services and accredited Embedded Network Manager services. However, in the event of Humenergy Group being unable to continue because of business failure, as a substitute for RoLR protections there will be in place arrangements to ensure continuance of electricity supply. These arrangements are as follows:

- Humenergy Group will not be a Financially Responsible Market Participant (FRMP) for any NMI meter
- The parent meter in the embedded network will be supplied electricity via a retail contract with a third-party retailer, with the third-party retailer being the Financially Responsible Market Participant
- The electricity account holder for the parent meter will either be held in the Body Corporate's name, or if held in Humenergy Group's name will be novated to the entity replacing Humenergy Group or to the Body Corporate in the event of Humenergy Group business failure thus ensuring continuity of supply to the parent meter
- Property owners and property tenants within the embedded networks have 'Power of Choice' under existing legislation thus have the ability and right to source retail contracts from alternative electricity retailers
- All meters installed within the embedded network are NEM compliant
- The physical assets of the embedded network, i.e. wiring and meters, will either be held in the Body Corporate's name or if held in Humenergy Group's name will be novated to the entity replacing Humenergy Group or the Body Corporate in the event of Humenergy Group business failure thus ensuring continuity of supply to the end user meters within the embedded network

5.7 Any additional information that will help us assess your organisational and technical capacity

Humenergy Group is a “behind the meter” specialist energy services provider. We are an innovative commercial and industrial energy specialist, partnering with many businesses, councils and government organisations on renewable energy and energy efficiency projects.

Humenergy Group has engineers, energy analysts, and electricians on staff providing complete energy solutions including:

- Embedded network solutions and Utility billing services
- Energy procurement
- Commercial Solar PV and energy efficiency solutions
- Consultancy and advisory services

We are technology and product agnostic and are experts at defining the optimum mix of tariffs, energy sources, and technology to achieve lowest possible energy costs for a given site or enterprise. We have significantly improved the benefits of solar projects by combining strategic electricity procurement and tariff optimisation in the selection and planning stage.

Our expert team has many years of combined experience in every phase of the energy supply chain, and we want to share our knowledge with you as we work together to keep driving costs down, improving energy efficiency and reducing carbon footprints. We are experts at renewable energy and energy efficiency project modelling, feasibility assessment, and project finance modelling.

Our unique range of capabilities and lean business structure is our competitive advantage as it allows us to roll out renewable energy projects more efficiently and more cost effectively to achieve greater value for our Clients. Our in-depth understanding of the solar industry allows us to provide innovative delivery models that reduce capital costs.

Financial Resources

6 Financial Resources

6.1 Copies of Humenergy audited financial reports for the past 12 months (note, we may ask for the previous two years' reports, if necessary)

Please see Appendix H (provided commercial in confidence).

6.1.1 All financial statements required by the accounting standards

Please see Appendix H (provided commercial in confidence).

6.1.2 Notes to financial statements

Please see Appendix H (provided commercial in confidence).

6.2 Evidence of long and / or short term credit rating/s (if available).

Please see Appendix I (provided commercial in confidence).

6.3 Details and evidence of your current financial position, for example, interim financial statements (for Start ups)

Not applicable. Humenergy is an existing business.

6.4 Humenergy Group – Group of related companies

Humenergy Group Pty Ltd (ABN 15 601 324 387) is a single entity not a group of related companies.

Humenergy Group operates the registered business name RMS Energy Management for the purposes of utility/electricity billing to separate embedded network user communications from corporate related communications.

6.4.1 Details of the ownership structure of the group

Humenergy Group Pty Ltd (ABN 15 601 324 387) is a single entity not a group of related companies.

6.4.2 The contractual arrangements that define relationships within the group

Not applicable. Humenergy Group Pty Ltd (ABN 15 601 324 387) is a single entity not a group of related companies.

6.4.3 Consolidated audited financial statements for the group.

Not applicable. Humenergy Group Pty Ltd (ABN 15 601 324 387) is a single entity not a group of related companies.

6.5 Written declaration from Managing Director that Humenergy Group is a going concern and that the officer is unaware of any factor that would impede your ability to finance your energy retailer activities under the retailer authorisation for the next 12 months

A written declaration from Ben Humphreys, Managing Director, that Humenergy Group is a going concern and that Ben Humphreys is unaware of any factor that would impede Humenergy Group's ability to finance energy retailer activities under the retailer authorisation for the next 12 months is included as *Appendix J (provided commercial in confidence)*.

6.6 Written declaration from an independent auditor or principal financial institution

A written declaration from Robertsonscannell (Humenergys accountant) is included as *Appendix K (provided commercial in confidence)* and covers the following declarations:

- 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 factor that would impede your ability to finance your energy retail activities under the authorisation

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

Humenergy intends to only onsell energy within embedded networks, with parent meter electricity consumption being acquired via third party retailers under standard retail market contracts. Thus, Humenergy Group's business model is relatively low risk compared to electricity retail businesses that are exposed to the wholesale electricity market. In addition, retailing of energy within embedded networks is a supplementary service to the core utility billing services and accredited Embedded Network Manager services, that Humenergy will be providing to its customers.

As detailed in Humenergy Group's financial statements provided in *Appendix H (provided commercial in confidence)*, Humenergy Group has sufficient existing cash holdings and sufficient positive cashflows from its existing business operations to fund the supplementary retail operations. Under Humenergy Group's business model, growth in the energy retailing activities will come together with growth in the utility billing services and accredited Embedded Network Manager services thus ensuring Humenergy Group will have access to additional capital as the business grows.

Humenergy Group is aware of the requirement for energy retailers operating outside of embedded networks to provide bank guarantees to the network distribution companies and AEMO for credit support and prudential requirements. If this becomes relevant to Humenergy Group in the future, prior to market entry, Humenergy Group will ensure all required financial guarantees are secured for, and provided to, these trading counterparts.

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

Forecast revenue and expenses have been detailed in the *Appendix A - Business Plan (provided commercial in confidence)*. As demonstrated in the financial statements provided in *Appendix H (provided commercial in confidence)*, Humenergy is currently a cash flow positive business and has a multi-year track record of being a cash flow positive business. The forecasts provided in the Humenergy Group Business Plan highlights all key assumptions.

6.9 Any additional information that will help us assess your financial capacity to operate as an energy retailer

NA.

Suitability

7 Suitability

7.1 Humenergy Group and Humenergy Group Associates Suitability

7.1.1 Any material failure to comply with regulatory requirements

For Humenergy Group, Humenergy Group's associates, any other business where Humenergy Group officers have held an officer position and any other entity that exerts control over Humenergy Group's business activities, there have been no material failures 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.

7.1.2 Any previously revoked authorisations

For Humenergy Group, Humenergy Group's associates, any other business where Humenergy Group officers have held an officer position and any other entity that exerts control over Humenergy Group's business activities there have been no previously revoked authorisations, authorities or licences held in any industry.

7.1.3 Any failed authorisation applications

For Humenergy Group, Humenergy Group's associates, any other business where Humenergy Group officers have held an officer position and any other entity that exerts control over Humenergy Group's business activities there have been no failed authorisation, authority or licence applications in any industry.

7.1.4 Any past or present administrative or legal actions in relation to an authorisation

For Humenergy Group, Humenergy Group's associates, any other business where Humenergy Group officers have held an officer position and any other entity that exerts control over Humenergy Group's business activities there have been no past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.

7.1.5 Any situation/s where Humenergy Group have previously triggered the RoLR provisions

For Humenergy Group, Humenergy Group's associates, any other business where Humenergy Group officers have held an officer position and any other entity that exerts control over Humenergy Group's business activities there have been no situation/s where you (or an associate) have previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely.

7.2 Any offences or successful prosecutions

Humenergy Group, its current director, and any person that exerts control over the Humenergy Group business, has not committed any offences or been the subject of successful prosecutions 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)²⁵ and the Corporations Act 2001 (Cth)) relevant to Humenergy Group's capacity as an energy retailer.

7.3 Criminal History Check

Upon request, Humenergy Group will provide a criminal history check conducted within the past 12 months for any directors or officers named in this application.

7.4 Disqualification and Bankruptcy

Written declarations from Humenergy Group's Managing Director stating that members of Humenergy Group's management team have not been disqualified from the management of corporations and about the nil record of bankruptcy of your management team (including in any overseas jurisdiction) is provided as *Appendix J (provided commercial in confidence)*.

7.5 Full names and current residential addresses of all Humenergy Group officers

Full names and current residential addresses of all Humenergy Group's officers is provided as *Appendix J (provided commercial in confidence)*.

7.6 Policies and procedures addressing the probity and competence of officers and any other key management staff

Policies and procedures addressing the probity and competence of officers and any other key management staff have been included as *Appendix L (provided commercial in confidence)*.

7.7 Any additional information that will assist in our consideration of the character and past performance of Humenergy Group's officers

On 4 December 2014 Humenergy Group Pty Ltd was granted an individual exemption in accordance with s.110 of the Retail Law. The exemption is limited to the sale of electricity through solar power purchase agreements.

On 4 December 2017 Humenergy Group Pty Ltd was granted accreditation and registration as an Embedded Network Manager by AEMO.

Appendices

Please note that all Appendices are provided on a Commercial-in-Confidence basis.

Item	Title	Commercial in Confidence
A	Humenergy Group Business Plan	Yes
A-1	Business Plan Forecast Financials	Yes
A-2	Humenergy Integrated QHSE Manual	Yes
B	List of locations, dates / time periods, where Humenergy Group provides ENM services, utility billing services, energy sales via PPAs	Yes
C	Compliance Management Strategy	Yes
C-1	Control of Retailer Compliance Obligations Procedure	Yes
C-2	Compliance Obligations Register	Yes
C-3	Retailer End User Hardship Policy	Yes
C-4	External Assurance of Risk and Compliance Systems	Yes
D	Complaints & Dispute Management	Yes
D-1	Retailer End User Complaints & Dispute Policy	Yes
D-2	Control of Retailer End User Complaints & Dispute Procedure	Yes
E	Risk Management Strategy	Yes
E-1	Control of Risks & Opportunities Procedure	Yes
E-2	Risk and Opportunities Register	Yes
F	Retail contracts used for off market customers in embedded networks	Yes
F-1	Master Supply Agreement Template	Yes
F-2	Energy Price Fact Sheet	Yes
G	Correspondence with the Energy and Water Ombudsman QLD & Energy and Water Ombudsman NSW	Yes
H	Humenergy Financials	Yes
I	Credit reports on Humenergy Group	Yes
J	Written declaration from Managing Director regarding: <ul style="list-style-type: none"> • Humenergy is a going concern • Humenergy's officers have not been disqualified from management 	Yes

	of corporations and have nil bankruptcy record <ul style="list-style-type: none"> Names and Addresses of officers 	
K	Written declaration from the principal financial institution	Yes
L	Policies and procedures addressing the probity and competence of officers and any other key management staff	Yes