

ONLINE POWER AND GAS PTY LTD

APPLICATION FOR ELECTRICITY RETAIL AUTHORISATION

INTRODUCTION

Online Power and Gas Pty Ltd (**Online Power and Gas, OPG**) is a privately owned company, proposing to expand its electricity retail business from Victoria to the other Eastern states of Australia. The following details constitute our submission for a retail authorisation in the other states administered by AER. This application has been compiled to articulate comprehensively how Online Power and Gas meets the following criteria:

- Organisational and technical capacity
- Financial capacity
- Suitability

This application has been put together in accordance with the AER's Retailer Authorisation Guideline, as well as the energy Retail Law and Rules and other relevant obligations such as Australian Consumer Law, Competition and Consumer Act and the Privacy Act.

1 INFORMATION ON THE APPLICANT AND NATURE OF THE APPLICATION

1.1 The Applicant

Name: Online Power and Gas Pty Ltd
ACN: 164 285 634
ABN: 95 164 285 634

A copy of the Online Power and Gas certificate of registration is attached as Attachment 1.

A copy of the constitution of Online Power and Gas is submitted on a Commercial-In-Confidence basis under Attachment 2.

A copy of the shareholders' agreement is submitted on a Commercial-In-Confidence basis under Attachment 3.

1.2 Registered address

27 Dudley Street, Melbourne, Victoria 3003

1.3 Address of business activities

As above

1.4 Key Contact

Mr Brett Harman
Chief Financial Officer

Ph: 03 8354 6800 Email: brett.harman@onlinepowerandgas.com.au

1.5 Corporate Structure

Online Power and Gas is a privately owned company. The corporate structure is set out in Attachment 4.

1.6 Organisational Structure & Experience of Key Personnel

The organisational structure is set out in Attachment 5, which also outlines the relevant and extensive experience of the salient personnel involved in Online Power and Gas.

1.7 Details of all contracts and agreements for outsourced services that are either under negotiation or to be entered into by the applicant to facilitate the conduct and operation of the electricity business.

Copies of the contracts and agreements for outsourced services are submitted on a Commercial-In-Confidence basis under Attachments 6 – 8 (both inclusive).

1.8 Details of parties having an interest in Online Power and Gas

Details of the shareholders of Online Power and Gas are resubmitted on a Commercial-In-Confidence basis under Attachment 8.

1.9 Details of prosecutions or regulatory complaint commenced against the application or related or associated persons or key personnel

There have not been any prosecutions or regulatory complaints commenced against Online Power and Gas, its related or associated person or its key personnel.

1.10 Details of licence

1.10.1 *Type of licence sought*

Online Power and Gas seeks an electricity retail authorisation for New South Wales, South Australia, Tasmania, Queensland and ACT

1.10.2 *Date from which licence is sought*

1 June 2016.

1.10.3 *Nature and scope of activities for which the licence is sought*

Online Power and Gas intends to retail electricity to both residential and small business customers in the additional states referenced above. Online Power and Gas is anticipating the commencement of this service from July 2016 at the latest.

1.10.4 *Details of current or former licences held in this and/or other jurisdictions*

Online Power and Gas currently holds an electricity retail licence in the Victorian electricity market.

1.10.5 *Previous unsuccessful licence applications sought in this and/or other jurisdictions*

Online Power and Gas has no unsuccessful licence applications in any other jurisdiction.

1.10.6 *Licences held by associates of the applicant. The term "associates" includes subsidiaries, parent and other related parties of the applicant as defined in the "Corporations Act 2001" (Cth)*

The associates of Online Power and Gas do not hold any licences in Victoria or any other jurisdiction.

1.10.7 *Licence conditions*

Online Power and Gas does not seek any non-standard licensing conditions.

1.11 **Existing activities both within and external to the electricity industry**

1.11.1 *List experience of key personnel, the applicant and related parties within and external to the electricity industry.*

Refer to Attachment 5.

1.11.2 *Details of the broad nature of proposed participation in the Australian electricity Industry*

Online Power and Gas is seeking to develop an online proposition for customers to receive their energy retail service mainly through online communication and management. Online Power and Gas has refined a model where it can efficiently compete in the retail electricity market through a low cost to serve and passing those efficiencies on to the customer through lower electricity usage charges. In this respect OPG has learnt from the extensive experience of its Directors and senior management and has successfully implemented a functional and robust customer care software solution and lowered substantially its overhead base. The benefit of such economies feeds through to customers who pay their bills promptly.

2 **MEETING MARKET OBJECTIVES**

2.1 **General**

2.2 The granting of an electricity retail authorisation to Online Power and Gas is consistent with the long term objectives of the Energy Law to “promote efficient investment in and efficient operation and use of energy services for the long term interests of energy consumers with respect to price, quality, safety, reliability and security of supply of energy.”

2.3 **Promoting the long term interests of Australian consumers**

Online Power and Gas will promote the long term interests of Australian electricity customers by providing them with an alternative. The move to full retail contestability within Australia was intended to give all electricity customers the right to choose a retailer, and more retailers means more choice for customers. Long-term, this benefit will best be achieved through the introduction of retailers with sustainable business models and appropriate financial capability – such as Online Power and Gas. Online Power and Gas aims to provide customers a better quality service by empowering them to have more control over their retail service experience. The use of online technology will greatly facilitate this experience. Online Power and Gas intends to couple this with additional products that will take advantage of the recent Smart meter roll out and provide customers an improved customer experience.

2.4 **The price of essential services**

In a market with the optimal number of retailers, competition will be optimal. Increased competition promotes efficient pricing. Online Power and Gas’s desire to enter the electricity retail market is based on analysis that suggests the market environment supports the addition of new entrant retailers. Additionally, the Online Power and Gas model allows for significant discounts on electricity and is focussed on savings gained due to operational efficiencies to be passed through to customers. Online Power and Gas can provide discounted prices to customers in a sustainable manner.

2.5 **Promoting a consistent regulatory approach within the electricity industry**

The Directors and members of the executive management team at Online Power and Gas have extensive experience in dealing with compliance and regulation within the electricity industry. OPG's business model and plan is based upon strong business ethics, sound corporate integrity and transparency.

2.6 The reliability of essential services

Online Power and Gas will utilise its experience in the electricity industry to engage appropriately with distributors to ensure high levels of service are met for its customers. Online Power and Gas intends to also utilise its online capabilities to provide the customer greater control over its retail service.

2.7 Promoting consistency in regulation between states

Online Power and Gas had always intended in the future to expand its retail service and operations into states other than Victoria. As such, Online Power and Gas has created its systems and processes with this expansion in mind. Online Power and Gas will further amend this infrastructure in line with any transition to retailing in other states.

3 FINANCIAL VIABILITY

Online Power and Gas is confident that it is able to meet and address the financial viability requirements.

3.1 Business plan/model

Please see the Business Model and Plan prepared by Online Power and Gas and submitted on a Commercial-In-Confidence basis at Attachment 9. The Attachment outlines the resources, broad business strategies and customer acquisition, forecast required for this venture. It also contains within the financial model, profit and loss, cash flow forecasts and assumptions around the electricity market based on research and experience.

3.2 Financial capacity

The Business Model and Plan submitted on a Commercial-In-Confidence basis at Attachment 9 illustrates Online Power and Gas's capacity to meet its financial requirements. Online Power and Gas assures the Commission that it will meet the financial viability requirement of S.19(2)(a) of the *Electricity Industry Act 2000* including meeting all prudential and credit support requirements..

Online Power and Gas is able to demonstrate its ability to operate a financially viable electricity retail operation and this has been successfully achieved in Victoria. OPG is now seeking to replicate this successful formula on a state by state basis.

Online Power and Gas would not consider undertaking retail market entry into other states without the necessary funding to support it through to profitable operation. Accordingly, the company will be capitalised on an ongoing basis to meet the cash commitments for the evolution of its business and we will be providing the requisite prudential security funding requirements of the distribution companies and the electricity market operator

3.3 Australian Financial Services Licence

Online Power and Gas has lodged an application for an Australian Financial Services Licence which will be obtained prior to September 2016 to enable the business to trade efficiently and on a commercially sound basis within the wholesale electricity market of Australia.

3.4 AEMO Support

Online Power and Gas has a relationship with AEMO and analysed relevant credit support requirements including projected figures. Online Power and Gas can confirm that it can meet these ongoing requirements. The attached business model has provided for these requirements to be met as an integral part of Online Power and Gas's financial backing.

3.5 Credit Rating

Online Power and Gas has obtained a Dynamic Risk Score credit rating. This is attached as attachment 10.

3.6 Distribution Arrangements

Online Power and Gas will formally meet with the relevant distributor in the AER electricity market to set up required relationships and processes before commencing retail activity. Online Power and Gas is seeking to build seamlessly on the success of these arrangements with the relevant Distribution Network System providers within each state.

3.7 Documentary evidence and support for Online Power and Gas's case that it has sufficient financial resources or access to such resources to sustain a viable business in the electricity industry

The documentary evidence required is submitted on a Commercial-In-Confidence basis under Attachments 11, 12 and 13.

4 TECHNICAL CAPACITY

Online Power and Gas can confirm that it can meet all compliance obligations required and that it has the technical capacity or has contracted required systems and resources to retail electricity in Australia.

The following attachments (numbered 5, 1, 14, 15, 16, 17, 18, 19, 20 and 21) support Online Power and Gas's expertise, knowledge and skill base to operate a viable electricity business in Australia:

- Organisational Chart (Attachment 5)
- Details of experience (Attachment 5)
- Certificate of registration (Attachment 1)
- Compliance Management Plan (Attachment 14)
- Customer Charter (Attachment 15)
- Terms and Conditions (Attachment 16)
- Example Pricing Fact Sheet (Attachment 17)
- Privacy Policy (Attachment 18)
- Financial Hardship Policy (Attachment 19)
- List of communications (welcome pack/credit letters) (Attachment 20)
- Disputes and Complaints Policy (Attachment 21)

This has been developed to meet all compliance and operational requirements to retail electricity in Victoria. Where possible some documents have been set up to meet AER jurisdiction requirements. All policies have been reviewed and signed off by our legal counsel. Where required, OPG can confirm it will set up similar processes and documentation to meet the requirements of the AER.

4.1 Compliance

Online Power and Gas has utilised its industry experience to develop the relevant compliance controls and reporting required to retail electricity effectively to customers. Attachment 14 outlines the processes and systems put in place to meet such requirements.

Online Power and Gas is outsourcing its base customer care and billing platform with Agility. This system has been utilised by a number of market entrants since deregulation and is set up to meet regulatory and compliance obligations to retail electricity in the Australian market. Attachment 22 contains information about the Agility Customer Information System.

All compliance obligations are reviewed and supported by our Legal advisors Cornwall Stodart. Our lawyers have extensive experience in retail energy compliance which should ensure that all requirements are met.

4.2 Wholesale

Online Power and Gas is currently partnered with an experienced wholesale third party in meeting its wholesale obligations. A copy of the agreement with this party has been attached as Attachment 23. Online Power and Gas can confirm that it will enter into a similar appropriate wholesale arrangement prior to commencing retail operations in each additional state that it seeks to enter.

4.3 Risk Management

Please refer to the Online Power and Gas business Model and Plan at Attachment 10 to see where OPG has created a model and strategy to manage risk in its operations.

4.4 Dispute resolution

Please see Attachment 21 for Online Power and Gas's Disputes and Complaints Policy. In conjunction with attachment 14 this outlines the process and reporting procedures that Online Power and Gas has set up to meet industry obligations. The management team at Online Power and Gas have extensive experience in handling customer complaints and, although prevention through sound acquisition processes is paramount the business can confirm it can meet all complaint handling requirements.

4.5 Training and Development

Online Power and Gas has created a training program in line with requirements articulated in the relevant codes and laws. This training covers regulatory compliance, explicit informed consent procedures, customer complaints handling, credit and hardship procedures, customer life cycle training etc. All training will be mandatory for internal staff and any marketing representative of the Online Power and Gas brand.

4.6 Retail CRM

Online Power and Gas has engaged the services of Agility Pty Ltd. Agility has been providing energy management software and support to utilities across Australasia and the UK for over 20 years and currently provides these services for a number of existing participants in the National Electricity Market. Please see attachment 22 which outlines the functionality of Agility software and services. Please also see attachment 6 to view a template agreement that has been executed between Online Power and Gas and Agility.

4.7 Other Support tools

In addition to our retail CRM Online Power and Gas is developing the following in house to support its retail strategy with:

- 4.7.1 website with fully integrated online self-service functionality;
- 4.7.2 internal CRM as a repository for all training, process maps, scripts and regulatory reporting; and,
- 4.7.3 appropriate storage facilities to house all agent voice recordings and any relevant documentation in accordance with all relevant laws and regulatory guidelines.

5 ADDITIONAL INFORMATION IN SUPPORT OF ELECTRICITY RETAIL APPLICATION

5.1 AEMO registration

Online Power and Gas is currently registered with AEMO. A copy of the current NEM registration list with Online Power and Gas as a participant is attached as attachment 24. Online Power and Gas can confirm that it can meet all its prudential requirements in line with its AEMO agreement.

5.2 ASX Austraclear Membership

Online Power and Gas is an ASX Austraclear member for the settlement of energy purchases.

Details of experience in and knowledge of the electricity industry

Please see Attachment 5 which details the experience of Online Power and Gas directors, senior managers and key personnel and the extent of their involvement in the electricity industry. The success of Online Power and Gas is very much founded upon their skills and experience.

5.3 Evidence that the applicant has the capacity to comply with the licence conditions, codes and guidelines relevant to its application

To ensure that Online Power and Gas has the capacity to comply with the Australian licence conditions, codes and guidelines Online Power and Gas engaged legal advisors with extensive experience in the electricity retail sector to prepare advice on Online Power and Gas's regulatory obligations. Based on this advice Online Power and Gas has created a Compliance Management System, a copy of which is Attachment 14 to this application. The regulatory and compliance obligations of Online Power and Gas will be continuously monitored on an independent basis by external legal service providers.

In addition, Online Power and Gas submits at Attachment 16 in the Commercial-In-Confidence section of this application, a copy of its draft terms and conditions demonstrating its in-depth understanding of the regulatory environment in Australia and its capacity to comply with all regulatory requirements.

5.4 If the applicant is to rely on another entity to provide staff and resources, a summary of the relationship between the applicant and this entity, including any formal agreements to provide services, and a summary of this other entity's experience in and knowledge of the electricity industry, and technical capacity to meet the relevant requirements of the licence.

Details of Online Power and Gas's staff are set out in Attachment 5. Online Power and Gas is in the process of continually recruiting to augment the expansion of OPG's business.

Online Power and Gas has a Services Agreement with Agility to provide billing and customer information services. Agility is a leading business partner to the utilities industry and has extensive experience in the Australian electricity sector aimed at continually improving the customer experience. A Heads of Agreement with Agility CIS Limited is submitted on a Commercial-In-Confidence basis and included in Attachment 6 to the application.

Online Power and Gas, on account of its expansion, has now entered into agreements with various outsourcing companies, namely Acurus for IT support. An Agreement with Acurus is submitted on a Commercial-In-Confidence basis and included in Attachment 8 to the application.

5.5 Whether the applicant intends to retail to either:-

- (1) (domestic/small business) or
- (2) (large businesses) or

(3) Both

Online Power and Gas's target customers are small to medium businesses across Australia as well as their affiliate owners and staff members. Online Power and Gas intends to service domestic and small business customers within a National Energy Market framework.

For this reason, Online Power and Gas seeks to retail to all small customer types — residential and small business.

5.6 Details of whether Online Power and Gas has entered into an arrangement with a licensed generator or re-allocation agreement to minimise exposure in the purchase of electricity on the wholesale market.

Online Power and Gas has entered into arrangements with an experienced third party to minimise exposure in the purchase of electricity in the wholesale market. The minimisation of Online Power and Gas's exposure on the wholesale market is managed by Online Power and Gas's Chief Financial Officer in consultation with the Online Power and Gas Retail Director. Online Power and Gas's Chief Financial Officer, details of whom are contained in Attachment 5, has experience within the Australian National Electricity Market (NEM) and has extensive knowledge of trading and risk management systems and solutions to manage Online Power and Gas's retail electricity risk. Online Power and Gas's Retail Director, details of whom are contained in Attachment 5, has experience in the NEM.

5.7 Online Power and Gas's Capacity to operate a business

Online Power and Gas has the capacity to:

- 5.7.1 manage supplier and customer contracts;
- 5.7.2 maintain customers' accounts accurately and securely;
- 5.7.3 provide customer service at least to the standards specified in the relevant Australian codes and guidelines;
- 5.7.4 manage and undertake customer billing and collection;
- 5.7.5 maintain appropriate management, governance and reporting systems consistent with codes and guidelines and to any applicable Australian Standards; and
- 5.7.6 maintain appropriate management and records systems.

This capacity is demonstrated in the following manner:-

- 5.7.7 Online Power and Gas's Key Management team has experience in the utilities sector, mainly dealing with electricity.
- 5.7.8 Online Power and Gas has internal procedures and policies in place to ensure that all regulatory obligations are complied with and provides continuous training to staff on these obligations.
- 5.7.9 Online Power and Gas will have internal procedures and policies in place to ensure compliance around settlement of Online Power and Gas's COGS obligations (AEMO, network payments and environmental payments).
- 5.7.10 Online Power and Gas, as a registered company, has reporting and compliance obligations under the *Corporations Act 2001* as well as general business compliance obligations such as payroll tax, superannuation and GST. Online Power and Gas has internal policies and procedures in place to ensure compliance with these obligations.

- 5.7.11 The Online Power and Gas Board, Managing Director, Directors and Company Secretary are fit and proper people and are not, or would not be, disqualified under the *Corporations Act 2001 (Cth)* from the management of corporations.

Online Power and Gas has documented procedures, processes and practices in place to achieve the outcomes of the Commission and to facilitate the training of personnel of the relevant industry standards in Australia and the AER's codes and guidelines. These procedures are set out in the Online Power and Gas Compliance Management System (Refer Attachment 14).

5.8 Manage supplier contracts and customer contracts

- 5.8.1 *Online Power and Gas's capability to enter supply contracts for the purchase of electricity or financial arrangements to hedge exposure to the wholesale electricity market*

Online Power and Gas will enter into supply contracts in the Australian states for the purchase of electricity. Online Power and Gas also has had discussions with wholesale entities and has confirmed they will enter into agreements prior to commencing retail operations to have financial arrangements in place to hedge its exposure to the wholesale electricity market.

- 5.8.2 *Online Power and Gas's capability to account for and settle energy purchases and/or network charges*

Online Power and Gas has requisite experience in settlement of AEMO outstanding through the ASX's Exigo (Austraclear) system.

- 5.8.3 *Online Power and Gas's capability to manage risk by having contingency arrangements and to establish processes to minimise any financial exposure.*

See Attachment 9 Business Model and Plan which details Online Power and Gas's procedures to manage risk and minimise its financial exposure.

- 5.8.4 *Customer contracts*

The terms and conditions of the proposed contracts with customers and potential customers will be in accordance with all the relevant codes and guidelines and clearly and accurately set out the customer's and Online Power and Gas's rights and obligations.

Submitted on a Commercial-In-Confidence basis and included under Attachment 16 is Online Power and Gas terms and conditions.

Online Power and Gas notes that it has an obligation to maintain accurate data on the Online Power and Gas website (once operational), including the terms and conditions of contracts, exit arrangements and other relevant consumer information. Online Power and Gas will have the required information placed on the website on the issue of the AER retail authorisation.

5.9 Customer account establishment and management

Online Power and Gas has policies and clear internal processes established to manage customer accounts including:

- 5.9.1 Online Power and Gas has the capacity to legally perform creditworthiness checks, where appropriate, with the required consent obtained from potential customers through credit organisations.
- 5.9.2 Online Power and Gas has established internal policies and procedures for new and existing customer accounts to ensure that the request for and holding of

personal information is in accordance with the *Privacy Act 1988 (Cth)* and the *National Information Privacy Principles*. Online Power and Gas is aware of the amendments to the *Privacy Act 1998* made by the Privacy Amendment (Enhancing Privacy Protection) Bill 2012 due to come into effect in March, 2014. In light of this amendment, Online Power and Gas is has updated its privacy policy and statements to ensure compliance with the new requirements.

- 5.9.3 In relation to the maintenance of accurate and up to date records of customers' account histories Online Power and Gas has customer information systems provided under its Services Agreement through the Agility CIS Limited Orion system. The Orion system ensures that customer's account histories are continuously updated to ensure accurate customer records.
- 5.9.4 Online Power and Gas has precise internal processes and procedures in place for the closure of customer accounts and the issuing of a final bill. These precise protocols have been established to ensure compliance under Online Power and Gas's retail electricity licences.

5.10 Customer service provision

Associates of Online Power and Gas have demonstrated their ability to operate and sustain a business by its success in similar start up retail electricity ventures.

Online Power and Gas operates an in-bound call centre in Melbourne to handle telephone calls from customers (and potential customers) about matters involving, amongst other things, account and billing issues and inquiries. Online Power and Gas has access to technology that allows for the accurate recording of all interaction and exchanges with customers or potential customers. Online Power and Gas prides itself on personalised service for customers and potential customers and a large part of this personalised service is Online Power and Gas's promise to customers that their telephone call will be answered by a real person located in Australia.

In light of this promise to its customers Online Power and Gas does not intend to contract out the services of a call centre to handle customers' issues but intends to deal with all customer issues in its in-house inbound call centre. This approach is very much in the interest of customers.

Online Power and Gas's inbound call centre records all inquiries and issues regarding customers (either by live recording or file notes in the Orion system). The inbound call centre will have procedures in place nominating employees to monitor customer correspondence by letter, fax or email and ensure that the strict time limits for the reply to and resolution of any customer issues is compliant.

On issue of the AER authorisation Online Power and Gas will apply to become a member and participate in the relevant Ombudsman scheme of the state it intends to operate in.

Online Power and Gas has the capacity to handle complaints and resolve disputes (i.e. Australian Standard AS 4269) and has a written Complaints Handling and Dispute Resolution Procedure. This Procedure is set out in the Online Power and Gas Customer Charter, in the Online Power and Gas terms and conditions and will also be set out on the Online Power and Gas website (once operational). This procedure handles the escalation of a dispute to the Ombudsman. This policy will be extended to include the relevant Ombudsman by state on the issue of retail authorisation with the necessary amendments made to the Customer Charter and the Online Power and Gas website.

5.11 Billing and collection

Online Power and Gas is able to manage all aspects of the customer billing and collection processes and has demonstrated capacity in relation to the following:

- 5.11.1 The provision of billing options for customers including direct debit, smooth monthly payments, postal payments and payments by cheque or credit card through the Orion System. Online Power and Gas's core smoothed product is a payment plan to smooth billing amounts and allow customers to better manage billing liability, thereby reducing the incidence of non-payment and increasing the level of customer protection.
- 5.11.2 The generation of cyclical bills from meter readings or estimations through Orion with valid meter readings billed between one and five business days of the agreed billing cycle.
- 5.11.3 Online Power and Gas has the capacity to comply with its obligations in the printing and dispatch of bills to customers through Orion and Online Power and Gas's Customer Experience Team which run Online Power and Gas's back office functions including billing and transfer operations.
- 5.11.4 Online Power and Gas has the capacity to receipt payments received from customers as well as manage late payments (as part of the Orion system). Online Power and Gas has dedicated employees to manage late payments who are trained and compliant in our regulatory obligations for late payment collection.
- 5.11.5 All Online Power and Gas staff, particularly staff in the inbound customer service centre, will be trained and compliant in the payment difficulties management process set out in Online Power and Gas's Hardship Policy. Online Power and Gas's Hardship Policy will be available to customers on Online Power and Gas's website. All staff will be trained, and monitored, in Online Power and Gas's obligations in respect of disconnection and reconnection of supply including time to reconnect and any charges that may be applied under the regulatory framework.
- 5.11.6 Online Power and Gas, through the Orion System, has internal processes in place for the recovery of unpaid debts. Online Power and Gas intends to minimise unpaid debts by customers through its smoothed product as well as instalment arrangements with customers.

5.12 Appropriate management systems

Online Power and Gas has established appropriate financial, operational and administrative systems for the successful operation of the business. Online Power and Gas's Chief Financial Officer has experience in running electricity accounting and risk management functions for electricity companies.

Online Power and Gas operates in accordance with the Australian Accounting Standards.

5.13 Capacity to comply with regulatory requirements Meter reading

Online Power and Gas has service agreements with its metering service providers which include requirements to comply with the relevant licence conditions and obligations.

5.14 Provision of information to customers

Online Power and Gas will provide information on service offerings to relevant customers and will include information on the following:

- 5.14.1 Customer obligations;
- 5.14.2 Retailer obligations;
- 5.14.3 Pricing information and options;
- 5.14.4 Online Power and Gas Customer Charter (containing minimum service standards);

- 5.14.5 Contract terms (terms and conditions of contract, termination provisions);
- 5.14.6 Meter reading schedule and/or estimation arrangements;
- 5.14.7 Details of billing (billing period, how bills are issued, contents of bills, basis of bills);
- 5.14.8 Bill error handling;
- 5.14.9 Payment (terms of payment, methods of payment, advance payment, late payment, instalments, concessions);
- 5.14.10 Complaint handling and dispute resolution processes (retailer's obligations, customer's rights, procedure, access to the relevant Ombudsman scheme
- 5.14.11 Termination of supply (procedure); and

The above information has already been collated and integrated into the existing Online Power and Gas information on service offerings.. Online Power and Gas envisages no issues arising in ensuring that the above information is provided to customers and relies on its history of regulatory compliance in its other Australian retail electricity jurisdiction.

5.15 Privacy and confidentiality management

Online Power and Gas will maintain the confidentiality of customer data and comply with relevant Commonwealth and State privacy legislation.

Online Power and Gas takes the protection of customers' private and confidential information extremely seriously.

5.16 Customer information management system

Online Power and Gas will have the appropriate customer information system in place to be in a position to report to the AER and licensed distributors. This system will include the following information:

- 5.16.1 Customer contact details including name, supply address, billing address and phone number;
- 5.16.2 Contract terms — prices and payment terms;
- 5.16.3 Payment history (12 months);
- 5.16.4 Record of complaints;
- 5.16.5 Consumption history;
- 5.16.6 Billing history;
- 5.16.7 Previous suppliers;
- 5.16.8 Contact notes (record of each customer call);
- 5.16.9 Requests for no marketing information; and
- 5.16.10 Management and compliance systems.

Online Power and Gas has a strong commitment toward the overarching management of risk, governance and compliance. Evidence of the systems relating to corporate governance, risk management and compliance with the relevant Australian Standards is set out in the Compliance Management System attached at Attachment 14. This Compliance System, as well as internal policies and procedures, will facilitate compliance testing, reviews and audits as required.

STATUTORY DECLARATION


I, Orson Gilmore of (insert address) ^{27 DUDLEY ST} ~~WEST MELBOURNE~~ ^{WEST MELBOURNE} being the Chief Executive Officer of the Applicant, ONLINE POWER AND GAS PTY LTD **Hereby DECLARE** that the information contained in this application, and attachments thereto upon which I have placed my signature, for the grant of an Electricity and Gas Retail Licence is true and correct and that I make this declaration conscientiously believing the same to be true and in the belief that a person making a false declaration is liable to the penalties of perjury¹

Declared at Docklands in the State of Victoria

Signature of Declarant

This day of 20th April day of April 2016


.....

 D. GARDAM
C/41088
.....

MELBOURNE WEST POLICE STATION
313 Spencer Street
Docklands 3008

Before me
(A person authorised by section 107A of the Evidence Act 1958 (Vic))

¹ Refer to section 107 of the Evidence Act