

Sunday, 2 April 2017

Mrs. Sarah Proudfoot General Manager Retail Markets Australian Energy Regulator GPO Box 520 Melbourne, Victoria 3001 Australia Sustainable Savings Pty Ltd ACN:604 401 103

Adelaide:

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Dear Mrs. Proudfoot,

Sustainable Savings welcome the opportunity to respond to the submission made by Mr Richard Mintz on behalf of Savant Energy Power Networks Pty Limited (Savant) dated the 27th of March 2017.

It is worth noting that Sustainable Savings and Savant would be competitors if our Retailer Authorisation is approved. In particular for the South Australian market as we are both located in this state.

Mr Mintz has also made several incorrect assumptions in his submission, particularly with regard to his statements around the Directors experience in energy costings, billing systems, retail service and financial reporting. Potentially this is due to the redacted information from the publicly available version submission.

We will address each section of the application Mr Mintz has raised as an area of concern.

2.3 - Please refer to the redacted information. As Sustainable Savings other business activities are already proving successful we have actively pursued these strategies.

Mr Mintz has also chosen to ignore the information in 2.2 detailing Matthew Curnow's experience in setting up and running an unbundled GreenPower product for Carbon Planet and then Pangolin Associates. This required the understanding of energy costings and how energy billing is conducted. It also involved customer bill analysis, the billing of this service, retail customer service, financial, sales and compliance reporting not only internally but also externally as part of the requirement of the GreenPower program.

2.6 - Please refer to the redacted information.

Mr Mintz has once again chosen to ignore the information provided that details the extensive modelling and understanding of our clients energy consumption and billing that we have conducted for over 10 years. The understand of billing



and the energy market (including energy futures and spot market) is key to this service.

The Aurora on Pirie Community Corporation work was also mentioned. Mr Mintz has made an incorrect assumption that we only developed the infrastructure. Detailed modelling was done on the potential billing for the tenants, including data logging of each floor to understand the consumption and demand profiles. We worked with the client to assist them to understand their regulatory requirements not only for the running of the network but also the process and approach of having tenants agree to be part of the embedded network. We assisted in the application for the required exemptions and to appoint an Embedded Network Manager.

Our ongoing involvement in the project has provided a wealth of experience in regards to billing analysis, job profitability reporting, child meters, tenant move in and out processes and retail customer service.

Mr Mintz also then questions the technical capability of the Directors in managing a business as complex as an energy retailer. It is interesting to note that in Savant's own Retailer Authorisation application Mr Mintz experience as the Managing Director of Love Energy (Aust) Pty Limited was quoted. A search on ASCI for this entity shows that it was actually in liquidation with Administrators appointed on the 12th of April 2013 (https://insolvencynotices.asic.gov.au/browsesearch-notices/notice-details/Love-Energy-Aust-Pty-Ltd-143472397/78467cf1-6178-417c-a643-8a594f0b5404). There was also some reporting in regards to business transactions around this time (http://www.adelaidenow.com.au/business/sa-business-journal/south-australian-struggling-solar-installer-love-energy-sold-to-friend-and-co-founder/news-story/23f43e39cfe69e2168e2babbcfe7b8d8).

In contrast, Matthew Curnow and Dr. David Ross were two of the four founders of a highly successful sustainability consultancy Pangolin Associates. This business not only provides consultancy in the areas of voluntary greenhouse gas emissions but also in regulatory areas such as the National Greenhouse and Energy Reporting Act (NGER). Pangolin Associates are one of the few Greenhouse and Energy Audit Services Panel suppliers for the Clean Energy Regulator, meaning we conduct a range of services for the regulator. Other services include but are not limited to carbon offsetting, energy audits and energy efficiency solution delivery, more details be be viewed online at http://pangolinassociates.com/sustainability-services/.

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Matthew Curnow was the joint managing Director until 2015 when he left to found another successful start up, Sustainable Savings, and currently holds the position of Managing Director. Matthew has remained a Director of Pangolin Associates.

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- 2.7 Please refer to the redacted information and our Business Plan.
- 2.14 Please refer to the redacted information and our Business Plan.

We appreciate that without access to the redacted information and our Business Plan Mr Mintz has made some incorrect assumptions in regards to the two sections above.

We trust the above addresses the concerns raised by Mr Mintz. In the event the Australian Energy Regulator requires any further information or clarification please do not hesitate to contact Matthew Curnow.

Yours sincerely,

Matthew Curnow

Managing Director