



CleanTech  
ENERGY

# CleanTech Energy Pty Ltd Electricity Retail Licence Application for Victoria

March 2020

Appendix B

**PUBLIC VERSION**



CleanTech  
ENERGY

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#### 4.1.1 INFORMATION ON THE APPLICANT AND NATURE OF THE APPLICATION

##### Applicant Information

##### 4.1.1a Legal Name & Trading Name

CleanTech Energy Pty Ltd (CleanTech Energy)

##### 4.1.1b ABN/ACN

ABN: 26 603 595 704

ACN: 603 595 704

##### 4.1.1c Registered business address

Ground Floor,  
1205 Hay Street  
West Perth WA 6005

Address for correspondence:

PO Box 262, West Perth WA 6872

##### 4.1.1d A nominated contact person, including their position in the organization and contact details

Name: Chris Wallace  
Position: General Manager, CleanTech Energy  
Address: Ground Floor, 1205 Hay St, West Perth WA 6005  
Phone: 08 6147 7555

##### 4.1.1e Certificate of Registration

**See Appendix D – CleanTech Energy Pty Ltd Business Registration Certificate**

#### 4.1.1f Type of Licence Sought

CleanTech Energy is applying for a licence to sell electricity under the Electricity Industry Act 2001(Victoria). We seek to retail to 40 – 160 MWh in a year (medium businesses) and > 160 MWh in a year (large businesses).

#### 4.1.1g Commencement Date of Retail Operations

CleanTech Energy does have perspective customers and would like to retail by Q1 - 2021, but this will ultimately be driven by if /when we have a full retail authorisation from the Essential Services Commission and any associated requirements.

#### 4.1.1h Nature and Scope of Operations

Our parent company Delorean Corporation Pty Ltd (Delorean Corp), also has a development company, Delorean Energy Pty Ltd (Delorean Energy) that can develop and fully fund or partner in projects that have a merchant business model. In this instance, we would look to secure a retail customer or group of customers that could back to back the generation output from Delorean Energy's projects with retail load in a medium to long term PPA. CleanTech Energy will provide energy balancing and retail operations to services at the connection point.

Our waste to energy solution involves oversizing the plant (when compared to the customer's electricity demand) to increase the overall value of the project and export excess energy. CleanTech Energy's business model involves retailing electricity which has been generated behind the meter of our customers where large-scale renewable energy generation has been installed and excess electricity is exported. In this strategy, we will have a long term (5 years or more) contract to buy and sell electricity with that customer, with a variable energy price based on the relevant spot price for that interval, plus a management fee. All market charges, network and regulatory charges passed through at cost. In doing this, we provide the customer a wholesale price signal and opportunity and minimise wholesale risk for CleanTech. Using this approach, our margin will remain positive, regardless of the wholesale electricity price.

The procurement of new electricity customers will be limited to sites where there is generation in the form stated above, or to another site controlled by the same company, or specific opportunities that align with the strategic growth plan of matching export generation with customers consumption requirements.

Our parent company Delorean Corporation Pty Ltd (Delorean Corp), also has a development company, Delorean Energy Pty Ltd (Delorean Energy) that can develop and fully fund or partner in projects that have a merchant business model. In this instance, we would look to secure a retail customer or group of customers that could back to back the generation output from Delorean Energy's projects with retail load in a medium to long term PPA. CleanTech Energy will provide energy balancing and retail operations to services contracted connection points.

#### 4.1.1i Details of current or former licenses held in this and/or other jurisdictions

CleanTech Energy are a registered market participant and electricity retailer in Western Australia who hold an electricity retail licence, ERL24, for the retail of electricity of large use and small-use business customers in South West Interconnected System (SWIS), Western Australia. The licence was issued on 18<sup>th</sup> of August 2015 and was amended to allow CleanTech Energy to supply electricity to small-use business customers on 4<sup>th</sup> May 2018.

CleanTech is also a registered Market Generator with AEMO (referred to as CTE) from 26<sup>th</sup> June 2015 in Western Australia for the BIOGAS01 facility.

CleanTech Energy has recently been approved by the AER licence on the 24<sup>th</sup> February 2020 to retail to Electricity Small and Large Market customers in South Australia, New South Wales, Australian Capital Territory, Tasmania and Queensland.

#### 4.1.1j Previous unsuccessful license applications sought in this and/or any other jurisdictions

CleanTech Energy has not previously had any unsuccessful licence application in Victoria or any other jurisdiction.

#### 4.1.1k Licenses held by associates of the applicant

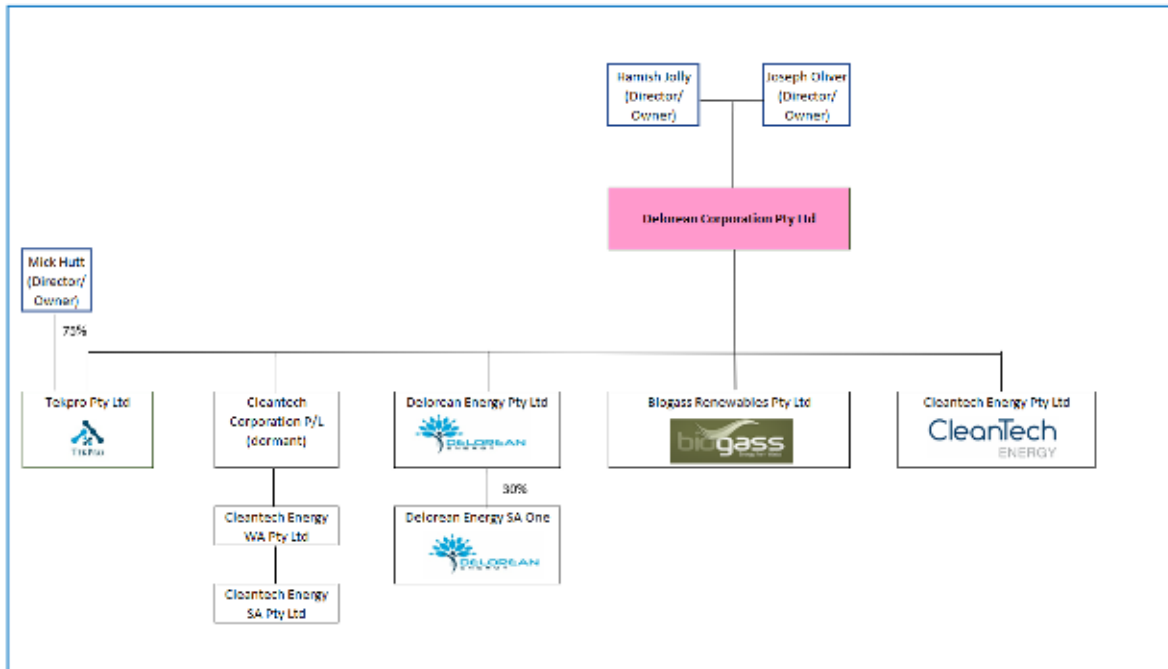
No associates of CleanTech Energy Pty Ltd have held licences in Victoria or any other jurisdiction.

#### 4.1.1l Non-Standard License Condition

CleanTech Energy does not seek any non-standard licence conditions.

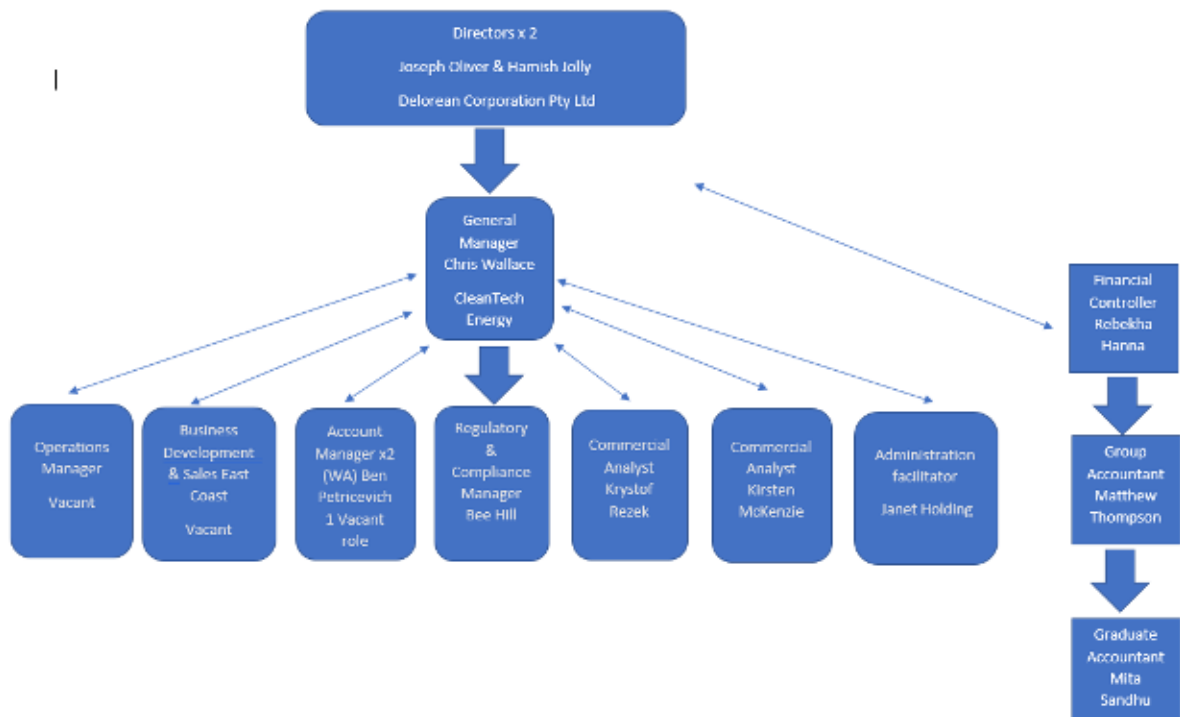
#### 4.1.1m Corporate Group Structure

CleanTech Energy is a wholly owned subsidiary of Delorean Corporation Pty Ltd. In addition to owning CleanTech Energy, Delorean Corporation has businesses that develop, manufacture materials for and builds renewable energy facilities.



See Appendix C – ASIC – Delorean Corporation PL - Shareholders

#### 4.1.1 In Organisation Structure



Key Personnel by Business Unit
2 Directors
1 General Manager
1 Business Development & Sales
2 Commercial Analyst's
1 Operations
2 Sales
1 Administration
1 Compliance
3 Accountants

#### 4.1.1o Summary of experience of Key Personnel and Directors

##### ***Hamish Jolly, Director – Strategy and Governance***

Hamish is responsible for the future direction, risk mitigation, and opportunity maximisation of CleanTech Energy. He brings decades of local experience in various sectors to the company. A Chartered Accountant (ACA), Hamish's career is in executive management (to CEO level) around commercial strategy, innovation and commercialisation, investment analysis, project management, banking, IT and environment.

Hamish has 20 years of professional services includes his role as a Consulting Director of global firm where he was part of the leadership team.

##### ***Joseph (Joe) Oliver, Director – Technical and Engineering***

Joe is responsible for liaising with and developing new renewable electricity generation facilities. Holding a Higher National Certificate in Electrical and Electronic Engineering, Joe was recruited from the United Kingdom due to his previous experience in project managing the construction of renewable energy power plants across Europe.

Joe has extensive experience in project management, business development and sales. Managing cash flow, optimising company efficiency and company marketing.

##### ***Chris Wallace, General Manager***

Chris has worked in the energy industry for over 13 years and worked for two large electricity/gas retailers who hold licences to supply to residential, small and large-use business customers and has worked across east and west coast markets.

Chris has a Graduate Diploma Business Administration and Master of Business Administration and Management at Griffin University.

##### ***Krystof Rezek, Commercial Analyst***



Krystof has a Bachelor of Business, majoring in Economics and Finance and has been working for CleanTech Energy for 4 years. As a Commercial Analyst, Krystof is responsible for forecasting, commercial and financial analysis, and risk assessment.

Krystof is also responsible for the administration of market operation requirements and price and forecasting analysis and is currently responsible for the billing of all CleanTech Energy customers.

Krystof also works with, and has extensive knowledge of, AEMO, Western Power and the Clean Energy Regulator. He has also improved business efficiency at CleanTech Energy by streamlining invoicing/billing of customers, customer quote process and has a great understanding of financial forecasting and modelling in the energy sector.

***Kirsten McKenzie, Commercial Analyst***

Kirsten has a Master of Engineering degree (Environmental) and Bachelor of Science.

Kirsten previously worked for Enel X (formerly Enernoc) and brings the following experience. The management and analytics of a demand management program for New Zealand's Regional Coincident Peak Demand (RCPD) charges; financial forecasting and settlement for performance-based programs; overseeing the analytics and prototyping of tools in the development of new program offerings relating to site peak demand management and advisory solutions; analysing electricity meter data from Enel X's portfolio of sites; assisting in managing a portfolio of customers.

***Ben Petricevich, Business Account Manager.***

Ben has over 10 years' experience in sales roles where has managed large portfolios of customers, which ranged from commercial to government sectors.

Ben has an aviation degree and has a very technical mind. Ben also has a strong background in client, account management, retention, customer service, sales and had over 10 years working in aviation, real estate and the hire industry. Ben is fully aware of ensuring that positive results and customer satisfaction are imperative and is accustomed to going above and beyond to exceed clients/customer expectations.

***Janet Holding, Administration Facilitator***

Janet has 10 years' experience working for a WA electricity and gas retailer dealing with customer transfers and all matters involving the network operator, as well as credit control, administration and team management. Janet's previous experience also includes managing the Western Power portal, churn requests, tariff updates/changes, meter history requests, manages customer site details, accounts receivable, contract administration, billing and all these skills will assist CleanTech Energy going into the NEM market. Janet will ensure that CleanTech will be compliant with retailer obligations under the National Energy Customer guidelines.

***Bernadette (Bee) Hill, Regulatory & Compliance Manager***

Bernadette has 19 years' experience working in the energy market in WA with Alinta Energy and two of those years were managing National Compliance Reporting for the East / West Coast Markets. Bernadette was then the Manager Customer Advocacy for a further two years managing a team in Victoria and a team in Western Australia who looked after hardship customers and ombudsman complaints and all the team worked across all jurisdictions.

Whilst working for Alinta Energy Bernadette had the opportunity to work across many areas of the business dealing with residential, small and large use business customers, and which included the following: billing, credit, payments, complaints, managing hardship/ombudsman complaints with EWOV, and also worked with financial counsellors in both the East and West Coast markets.

#### ***Rebekha Hanna – Financial Controller***

Rebekha is CPA qualified and has previously worked for an engineering, construction and maintenance services company and part of CIMIC Group – one of the world's largest contractors.

Prior to that Rebekha held Finance Manager/Financial Controller roles for two groups of companies of similar size and growth as CleanTech Energy – one in multi-services and the other in subsea technologies. This is supported by a Tax Accountant role with national firm Crowe Horwath.

#### ***Matthew Thompson – Group Accountant***

Matthew, a Chartered Accountant, studied a Commerce Degree in Accounting and Small Business. He came onboard with CleanTech Energy in 2018 due to the growth in WA.

Previously, Matthew worked as a group accountant large WA company as their Group Accountant while studying a graduate diploma in Governance. Previously, he spent seven years with a Chartered Accountants in a senior business services role

#### ***Aasmita (Mita) Sandhu - Junior Accountant***

Mita has a degree in Accounting and Business Law and joined CleanTech Energy after excelling at an internship.

Mita manages account receivables and payables, records and keeps track of transactions, admin, website updates, booking travel arrangements, assists group accountant with monthly preparation of end of month reporting, reconciliations and Mita also assists in all other areas of the CleanTech Energy business.

[See Appendix F – Staff Numbers and Organisational Chart - Commercial-in-confidence](#)

## 4.1.2 INFORMATION ON TECHNICAL CAPACITY

### 4.1.2a Capability Statement

CleanTech Energy has the expertise, knowledge and skill base to operate a viable retail electricity business within Victoria. CleanTech Energy has appointed experienced, skilled and capable management team to run CleanTech Energy's Retail Business.

CleanTech Energy team were chosen for their individual expertise and between them there is a wide range of knowledge and experience. As we grow our customer base our intention is to grow our team accordingly but also for the current CleanTech Energy team to continue to develop and further enhance their capability across multiple regions and markets.

CleanTech Energy have a compliance management system and policies such as, but not limited to, risk management, privacy policy, life support policy and disconnection policy; to ensure that we are compliant with all regulatory obligations.

To ensure that CleanTech Energy meets its regulatory compliance obligations, specific training, listed below, will be provided by an external company/companies across the team prior to entering into the retail electricity market in Victoria.

- Contract Law
- Competition and Consumer Law
- Understanding MSATS
- Privacy Act
- Electricity Transfer Code
- Electricity Metering Code
- Electricity Distribution Code
- Electricity System Code
- Electricity Industry Act 2000(Vic)
- Energy Retail Code
- Electricity Safety Act 1998 (Vic)

### 4.1.2b Outsourced Activities and supplier and customer contracts

CleanTech Energy does not at this stage intend to outsource any of the operational back office functions.

Given the inherent risks, data rich and compliance focussed environment within Victoria's retail and wholesale energy markets, CleanTech Energy is seeking support and guidance from appropriately qualified consultants and advisors prior to entering the market and contracting customers.

CleanTech Energy is actively engaging with the Metering Dynamics and data management to procure the service/s of an AEMO accredited service provider.

[See Appendix 5 - CleanTech Energy Standard Retail Contract](#)

[See Appendix Y - Metering Dynamics Communication](#)

#### 4.1.2c Customer account establishment and management

CleanTech Energy understands the importance of account establishment / management and also ensuring that customer details are captured and recorded correctly. CleanTech Energy currently use Salesforce to manage our WA customers and we intend to leverage and continue to use this system to ensure consistency across all states where we have a licence to retail.

All CleanTech Energy customers will have a dedicated account manager to manage their account/queries, data requests etc.

#### 4.1.2d Billing and collection

CleanTech Energy has established already a comprehensive billing, payments and credit & collections service including the provision of:

- Bill cycle management
- Bill design and presentment
- Billing and payment exception management
- Refunds management
- A range of billing and payment options
- Credit management workflow
- Management of uncollectable debt
- Payment extensions management
- Management of uncollectable debt and
- Business processes for managing billing, payments and collections

#### 4.1.2e Privacy and confidentiality management

CleanTech Energy will comply with all privacy legislation and retail code relating to customer privacy and confidentiality.

[See Appendix I - Privacy and Credit Reporting Policy](#)

#### 4.1.2f Australian Energy Market Operator (AEMO)

CleanTech Energy is to be registered with AEMO as a Customer under section 11(4) of the National Electricity Law and clause 2.3.1 of the Rules and the application has been submitted with AEMO. This

will allow CleanTech to purchase electricity wholesale exchange on behalf of its customers, operated by AEMO for on-sale to customers.

**See Appendix V – AEMO Communication**

#### 4.1.2g Australian Energy Regulator

CleanTech Energy Pty Ltd has been approved by the AER to retail to Electricity small and large market customers in SA, NSW, QLD, ACT & TAS on the 24<sup>TH</sup> February 2020.

**See Appendix O – CleanTech Energy AER Retailer approval letter**

#### 4.1.2h Distributors

CleanTech Energy has contacted all distribution networks and is currently working through the application process with Citi power, Jemena, Powercor, United Energy and Ausnet. We will work through the process with Energy Safe Victoria when this is required as part of our application process.

**See Appendix X – Distributor Communication**

#### 4.1.2i Austraclear

CleanTech Energy Pty Ltd is a current user of the Austraclear system and has been using this system since 26 July 2015 for the West Australian Electricity market.

#### 4.1.2j Energy and Water Ombudsman (Victoria)

CleanTech Energy is currently working through the application process to become a member of the Energy and Water Ombudsman.

**See Appendix N – EWOV Communication**

#### 4.1.2k Australian Financial Services Licence

CleanTech Energy will not be providing any services (under Chapter 7 of Corporation Act 2001 or ASIC Regulatory Guide 36: Licensing: Financial product advice and dealing) that requires an Australian Financial Services Licence.

#### 4.1.2k1 Energy Safe Victoria

CleanTech Energy has commenced communication with Energy Safe Victoria to ensure that we meet our obligations under the Electricity Safety Act 1998 (Vic).

**See Appendix 6 – Energy Safe Victoria Communication**

#### 4.1.2l Appropriate management systems

CleanTech Energy uses Xero Business system for financial management and reconciliation. This system is compliant with Australian Accounting Standards.

#### 4.1.2m Wholesale Market Interaction System

CleanTech Energy has engaged with AEMO to ensure our system complies with AEMO IT requirements for market & system interfaces as set out in the Market Participant registration process. The business has experience in dealing with AEMO's B2B processes in the WEM and have applied this knowledge to implementing a solution for the Victorian region.

This includes obtaining licences and access to MarketNet and Austraclear.

#### 4.1.2n Customer Contracts Management

CleanTech Energy understands the importance of on-boarding customers and ensuring that customers details are accurately captured in the customer information and billing system. All customers will have a dedicated Account Manager to assist them.

CleanTech Energy has chosen to use Salesforce to manage all our contract and customer information. Salesforce allows CleanTech to store and secure customer contracts and information in one secure system.

#### 4.1.2o Customer Service and customer information management system

CleanTech Energy is currently operating a personalised Account Management service model for our existing business customers in Western Australia. The personalised service ensures all customers enquiries and market interactions are actioned by our current team or a dedicated account manager.

Communication channels with customers are through telephone, email and can be face to face interaction. This team will be expanded as our customer base grows in the East Coast Market.

#### 4.1.2p Complaints Register and Procedures

CleanTech Energy has a Complaint Handling Policy, Procedure and a Complaints Register to ensure the efficient resolution of customer complaints.

[See Appendix G - Complaints and Disputes Resolution Policy](#)

[See Appendix M - Complaints Procedure](#)

[See Annexure 1 – Complaints Register](#)

#### 4.1.2q Document Retention

CleanTech Energy will securely store all customer contract information for a period of 7 years. All personal information relating to customer contracts, correspondence and consent will be handled in line with the principles outlined in our Privacy & Credit Reporting Policy.

#### 4.1.2r Internal Controls Policies and Procedures

CleanTech Energy has put in place a range of internal controls, policies and procedures to ensure the smooth running of business operations to ensure we are compliant with all relevant electricity codes, rules and regulations. All current staff and any new recruits will go through training to ensure they understand all the below policies and procedures.

Please refer to the following Policies, Procedures and Registers

- |   |   |
|---|---|
| • <a href="#">Complaints and Dispute Resolution</a>   | <a href="#">Appendix G</a>                          |
| • <a href="#">Risk Management Strategy</a>            | <a href="#">Appendix H Commercial-in Confidence</a> |
| • <a href="#">Privacy and Credit Reporting Policy</a> | <a href="#">Appendix I</a>                          |
| • <a href="#">Compliance Management Policy</a>        | <a href="#">Appendix J Commercial-in Confidence</a> |
| • <a href="#">Disconnection Policy</a>                | <a href="#">Appendix K</a>                          |
| • <a href="#">Life Support Policy</a>                 | <a href="#">Appendix L</a>                          |
| • <a href="#">Internal Complaints Procedure</a>       | <a href="#">Appendix M Commercial-in-Confidence</a> |
| • <a href="#">Complaints Register</a>                 | <a href="#">Annexure 1 Commercial-in Confidence</a> |
| • <a href="#">Risk Register</a>                       | <a href="#">Annexure 2 Commercial-in-Confidence</a> |
| • <a href="#">Obligations Register</a>                | <a href="#">Annexure 3 Commercial-in Confidence</a> |

### 4.1.2s Risk Management Framework

The chart below shows our High – Level outline of CleanTech Energy’s Risk Management framework:





By promoting a strong risk management culture, we are committing to ensure that risk management practices are embedded into all operational, financial and other aspects of the business to drive consistent, effective and accountable practices and decision making for all CleanTech Energy employees and our commercial partners.

The Risk Management policy sets out details of the organisational procedures for designing, implementing, monitoring, reviewing and continually improving risk management throughout the business. This is supported by our Risk Management Register which will be used to identify, record and categorise risks. Any potential risks will then be evaluated against a rating criterion to be assessed, and measures will be put in place to deal with the risk accordingly.

CleanTech Energy is committed to the effective management of its strategic, operational, and financial risks to achieve the organisations vision, purpose and strategic objectives.

CleanTech Energy will:

- Maintain a relevant risk management framework that articulates standards and responsibilities across all levels and functions of the business, including processes for risk identification, monitoring, treatment, and reporting
- Manage risks in a manner that is commensurate with expectations of customers and all legal and regulatory and legislative obligations
- Have robust audit, compliance and general governance functions
- Monitor and manage financial risk closely, including customer payment
- Promote consistency and transparency in methodology, assessment, and management process
- Have clear processes in place for reporting on risk status, and changes to risk status
- Set clear expectations and monitor how often risks will be reviewed, the process for review and who will be involved
- Provide appropriate, consistent and transparent ownership and accountability for risk mitigation, with leadership coming from the Director level
- Promote proactive recognition of external factors and anticipation of uncertainties that may affect the achievement of strategic objectives
- Recognise that timely and accurate monitoring, review, communication is critical for:
  - Providing mechanisms for the timely identification and effective management of risk occurrences and consequences
  - Providing confidence in management practice to the directors
  - Providing a solid platform for growth
- Undertake regular reporting of the corporate risk to the risk management committee

See Appendix G – Risk Management Strategy has been developed to ensure that CleanTech Energy is compliant with all its legal obligations as an authorised retailer.

[See Annexure 2 – Risk Register](#)

#### 4.1.2t Compliance Policy

As a licensed electricity retailer on the SWIS grid, CleanTech Energy is very aware of and understands the obligations it has under the Electricity Industry Act and Energy Retail Code in relation to retailing electricity.

The General Manager is the nominated member responsible for the development of appropriate operational procedures, policies and other measures to ensure that CleanTech Energy always complies with their obligations.

The Regulatory Compliance Manager will also oversee the preparation and submission of compliance reports to the relevant governing body as required and is responsible for training and educating of all staff to ensure full compliance with all relevant obligations on an ongoing basis.

CleanTech Energy is committed to maintaining a culture of compliance to all laws, policies, procedures, regulatory frameworks and organisational requirements applicable to its role as an energy retailer, this includes finance, reporting, employment, right to information and competition.

The purpose of this Policy is to:

- outline CleanTech Energy's key categories of compliance obligations
- set out CleanTech Energy's compliance management objectives in all its operations, maintaining a culture of compliance and to clearly promote a positive compliance culture with all employees in relation to meeting its compliance objectives and risks; and
- document a clear plan to identify and monitor all compliance obligations, including those imposed on authorised retailers.

This policy aligns with the principles and requirements set out in ISO 19600:2015 Compliance Management Systems Guidelines and has been endorsed by the CleanTech Energy's Directors and General Manager.

The Compliance and Risk Management Committee is focused on regulatory compliance and business risk. The committee will meet regularly to review current regulatory compliance, reporting obligations applicable to our retail energy business and will have them recorded in a compliance obligations register.

The chart below shows a high-level outline of CleanTech Energy's compliance management process:



### [See Annexure 3 - Obligations Register](#)

#### Non-Compliance:

All non-compliance needs to be appropriately reported. While the reporting of systemic and recurring problems is particularly important, a one-off non-compliance can be of equal concern if it is major or deliberate. Even a small failure may indicate serious weakness in the current process and the compliance management system. If not reported in a timely manner it can lead to the view that the failure does not matter and can result in such failure becoming a systemic problem.

Any non-compliance matters that are high risk will be escalated by the Regulatory & Compliance Manager to the General Manager/CRMC for discussion with the Directors through CleanTech Energy's non-compliance reporting process.

### [See Appendix J – Compliance Management Policy](#)

## 4.1.3. - INFORMATION ON FINANCIAL CAPACITY

### 4.1.3a Introduction

CleanTech Energy has been operating in the SWIS (WA) since 2015 which will assist CleanTech Energy to a smooth transition to retailing electricity in Victoria.

Our parent company Delorean Corporation Pty Ltd (Delorean Corp), also has a development company, Delorean Energy Pty Ltd (Delorean Energy) that can develop and fully fund or partner in projects that have a merchant business model. In this instance, we would look to secure a retail customer or group of customers that could back to back the generation output from Delorean Energy's projects with retail load in a medium to long term PPA. CleanTech Energy will provide energy balancing and retail operations to services at the connection point.

### 4.1.3b Financial Capacity

CleanTech has prepared a commercial-in-confidence five-year financial forecast (Appendix 4) as part of this application which demonstrates that returns relating to activities undertaken under a retail authority make commercial sense. CleanTech has the financial resources to commence and sustain its retail operations in Victoria. Appendix 4 provides evidence that CleanTech is financially viable to provide the proposed electricity retail services and has sufficient financial resources to sustain its operations.

#### 4.1.3c Current Balance Sheet and Financial Data

Relevant company financial information has been provided in the following appendices:

- Appendix 4 Financial Forecast
- Appendix S CleanTech Energy Jan2020 YTD Financial Accounts
- Appendix T CleanTech Energy 2019 Financial Accounts
- Appendix U CleanTech Credit Assessment File\_Aug19
- Appendix W Statement accountant
- Appendix Z Guarantees in place

**All Financial documents are Commercial-in-Confidence**

#### 4.1.4 - THE COMMISSION'S OBJECTIVE

Essential Services Commissions Act 2001 – section 8

##### Objective of the Commission

- (1) In performing its functions and exercising its powers, the objective of the Commission is to promote the long-term interests of Victorian Consumers.*
- (2) Without derogating from subsection (1), in performing its functions and exercising its powers in relation to essential services, the Commission must in seeking to achieve the objective specified in subsection (1) have regard to the price, quality and reliability of essential services.*

Electricity Industry Act 2000 – section 10

*The objectives of the Commission under this Act are –*

- (a) to the extent that it is efficient and practicable to do so, to promote a consistent regulatory approach between the electricity industry and the gas industry; and*
- (b) to promote the development of full retail competition; and*
- (c) to promote protections for customers, including in relation to assisting customers who are facing payment difficulties.*

CleanTech Energy has identified an opportunity to grow its retail presence by expanding to operate in all states in the NEM.

In CleanTech Energy's Business (refer to Appendix E), CleanTech Energy's objective is to grow our retail position in support of renewable projects being developed by Delorean Energy and retail energy to customers that seek competitive renewable energy products and contracts.

Our products will be developed with clear guidance for customers on the source of the energy, the applicable risks and the opportunities to optimise demand side. Depending on the customer's requirements we can tailor the parameters to meet their capability and sophistication. Ultimately, we

want to continue to promote renewable energy as a viable alternative to current, standard energy products.

As a current Market participant and electricity retailer in WA, CleanTech Energy is an advantageous position as it looks to expand to the NEM. Our business plan for targeted growth will mean a relatively small investment in resource and systems. We anticipate much of the corporate activities will be based in Perth with a small team of market facing, energy professionals based across the NEM. This will allow us to manage the overhead and ensure the incremental costs to grow the business in the NEM will be managed and allow for competitive products from our launch.

CleanTech Energy is committed to delivering the best possible outcomes for its customers and the reputation of CleanTech Energy will be built on delivering competitive products, being customer focussed and remain responsive to a dynamic energy market.

[See Appendix E – Business Plan – Commercial- In-Confidence](#)

#### 4.1.5 – FIT AND PROPER PERSON

1. Have any directors of the applicant or of any entity that can exert control over the applicant:

- (a) been declared bankrupt
- (b) had their affairs placed under administration
- (c) been disqualified from managing a company

1.CleanTech Energy’s directors who are the shareholders of CleanTech Energy’s parent company Delorean Corporation Pty Ltd have never been declared bankrupt had their affairs placed under administration, disqualified or suspended from managing any companies.

2. Have any directors of the applicant, directors of any entity that can exert control over the applicant or any person with significant managerial responsibility or influence on the applicant been subject to:

- (a) any debt judgments, or
- (b) insolvency proceedings (including any administration, liquidation or receivership in connection with the affairs of a company)?

2.CleanTech Energy’s directors who are the shareholders of the parent company Delorean Corporation and senior management have never had any debt judgments or insolvency proceedings (including any administration, liquidation or receivership in connection with the affairs of any company.

3. Have any directors of the applicant, directors of any entity that can exert control over the applicant or any person with significant managerial responsibility or influence on the applicant been charged with fraud, theft or any other criminal offence?

3. CleanTech Energy's directors who are the shareholders of the parent company Delorean Corporation and senior management have never been charged with fraud, theft or any other criminal offences.

4. Have any directors of the applicant, any related body corporate, or any person with significant managerial responsibility or influence on the applicant been involved in any material breaches of obligations regulated by the Essential Services Commission?

4. CleanTech Energy's directors who are the shareholders of the parent company Delorean Corporation and senior management have never been involved in any material breaches of obligations regulated by the Essential Services Commission.

5. Has the applicant, any directors of the applicant, directors of any entity that can exert control over the applicant or any person with significant managerial responsibility or influence on the applicant been prosecuted for any offences or had any enforcement action taken under any state territory, Commonwealth or foreign legislation (including, but limited to, the Competition and Consumer Act 2010 (Cth), Corporations Act 2001 (Cth), or the Australian Securities and Investments Commission Act 2001 (Cth) ?

5. CleanTech Energy's directors who are the shareholders of the parent company Delorean Corporation and senior management have never been prosecuted for any offences or had any enforcement action taken under any state territory, Commonwealth or foreign legislation (including but not limited to the Competition and Consumer Act 2010 (Cth), or the Australian Securities and Investments Commission Act 2001 (Cth)).

6. Has the applicant, any related body corporate or any person with significant managerial responsibility or influence on the applicant, been refused a licence or authorization, or had restricted, suspended or revoked any such licence?

6. CleanTech Energy's directors who are the shareholders of the parent company DeLorean Corporation, senior management or any related body corporate have never been refused a licence or authorization, or had restricted, suspended or revoked any such licence.

#### 4.1.6 – COMMERCIAL-IN-CONFIDENCE

These are commercially sensitive documents regarding CleanTech Energy's Finances, Strategies, Contract IP and Personal information.

Appendices - Commercial- in-Confidence:

Appendix A CleanTech Energy Pty Ltd Retail Licence Application – Electricity – **Commercial- in- Confidence**

Appendix C ASIC – Delorean Corporation PL – Shareholders – **Commercial- in- Confidence**

Appendix D CleanTech Energy Pty Ltd – Business Registration – **Commercial- in- Confidence**

Appendix E Business Plan – **Commercial-in-Confidence**

Appendix F Staff Numbers – Organisational Chart – **Commercial-in- Confidence**

Appendix H Risk Management Strategy – **Commercial-in-Confidence**

- Appendix J Compliance Management Policy - **Commercial-in- Confidence**
- Appendix M Internal Complaints Procedure - **Commercial-in- Confidence**
- Appendix N AEMO Communication - **Commercial-in- Confidence**
- Appendix O AER Retailer Approval Letter - **Commercial-in- Confidence**
- Appendix P Statutory Declaration Financial Controller - **Commercial-in- Confidence**
- Appendix Q Statutory Declaration Director HJ - **Commercial-in- Confidence**
- Appendix R Statutory Declaration Director JO - **Commercial-in- Confidence**
- Appendix S CleanTech Jan2020 YTD Financial Accounts - **Commercial-in- Confidence**
- Appendix T CleanTech 2019 Financial Accounts - **Commercial-in- Confidence**
- Appendix U CleanTech Credit Assessment File\_Aug19 - **Commercial-in- Confidence**
- Appendix V EWOV Communication - **Commercial-in- Confidence**
- Appendix W Statement accountant - **Commercial-in- Confidence**
- Appendix X Distributor Communication - **Commercial-in- Confidence**
- Appendix Y Metering Communication - **Commercial-in- Confidence**
- Appendix Z Guarantees in place - **Commercial-in- Confidence**
- Appendix 1 Complaints Register - **Commercial-in- Confidence**
- Appendix 2 Risk Register - **Commercial-in- Confidence**
- Appendix 3 Obligations Register - **Commercial-in- Confidence**
- Appendix 4 5 Year Financial Forecast - **Commercial-in- Confidence**
- Appendix 6 Energy Safe Email - **Commercial-in-Confidence.**

#### Appendices Public:

- Appendix B CleanTech Energy Pty Ltd Retail Licence Application – Electricity – **Public**
- Appendix G Complaints and Dispute Resolution Policy – Public
- Appendix I Privacy and Credit Report Policy
- Appendix K Disconnection Policy