

**Application for a
Retail Gas Licence in Victoria
Momentum Energy Pty Limited - June 2007**

Section 1 Information on the applicant and nature of the application

Identity of Applicant

Momentum Energy Pty Limited

Legal Identity of Applicant

Momentum Energy is a private, limited company incorporated 8 July 2002 in Victoria.

ACN 100 569 159

ABN 42 100 569 159

Address and Contact Details of Applicant

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Level 8, 50 Market Street
Melbourne, Victoria 3000

Postal Address:

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Contact Person on behalf of Applicant

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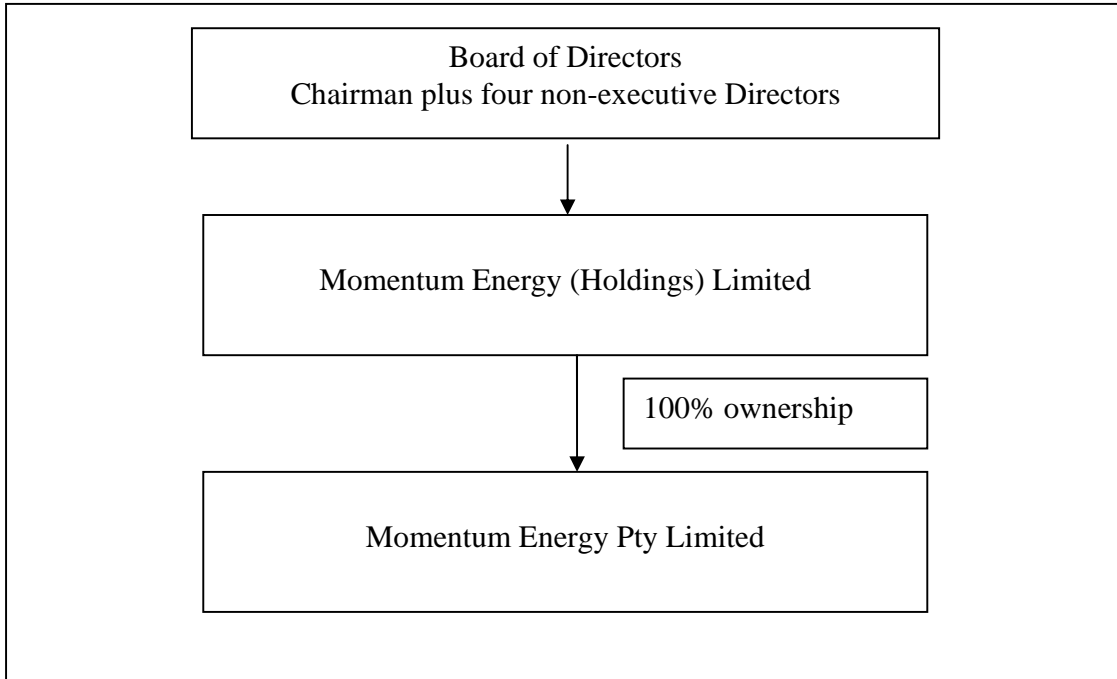
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Corporate Structure

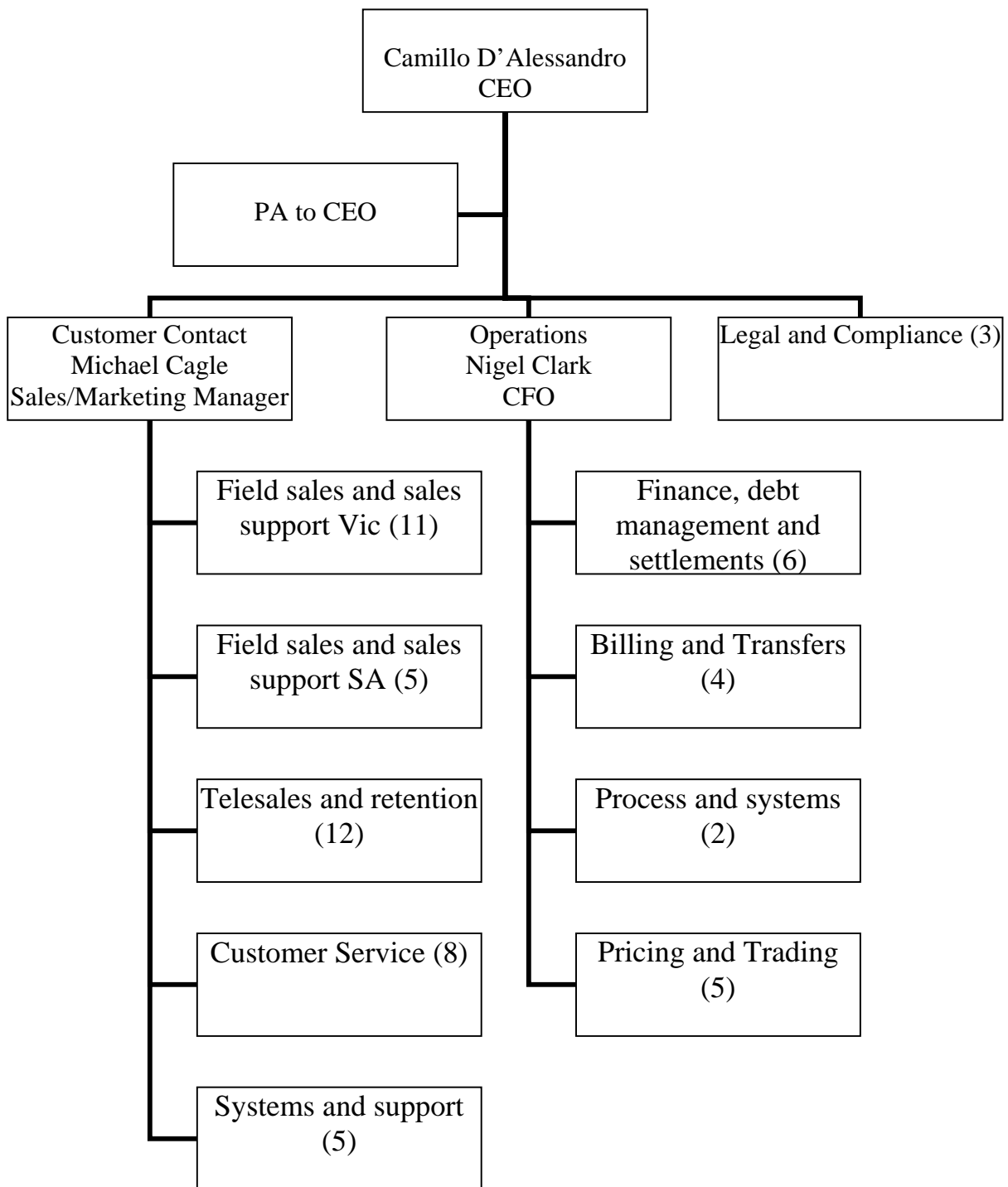
Momentum Energy Pty Limited is 100% owned by Momentum Energy (Holdings) Limited.



Organisation Structure

As at May 2007, Momentum Energy has a headcount of approximately sixty staff. This is divided into the two broad functional groupings of sales and operations. The legal and compliance function that also deals with complaints and regulatory issues also reports directly to the CEO.

Amongst the management group there is significant experience and skills from the retail energy market. This includes trading, financial support, customer contact centre management and market compliance. In addition, the experience of the Directors and external experts is available to the company on an as required basis.



Key Personnel

The following profiles of the senior management team demonstrate that Momentum Energy has the appropriate personal with the right skills and experience to successfully operate a retail gas business in Victoria.

Senior Management Team

Camillo D'Alessandro - CEO: Camillo took up the position of Chief Executive Officer for Momentum Energy Pty Ltd in September 2004 following an extensive career across a range of senior management positions in Australia and Europe. His 24 year career has spanned the Construction/Engineering, Transport, Systems Integration and Electrical industries.

As CEO, Camillo's responsibility at Momentum has been in developing the infrastructure, human capital and implementing the processes required to establish a robust energy business. He has developed strong relationships with regulatory bodies and suppliers during this period and takes a 'hands on' approach in many aspects of the business, guiding different teams to effective solutions in a complicated and detailed business environment.

Michael Cagle – Sales and Marketing Manager: Michael comes to Momentum with a strong sales background across several diverse industries. At Momentum Michael is responsible for the overall sales effort, including internal field and telesales teams, and managing the external relationships with our channel partners. He is able to apply his considerable sales and management skills, identifying sales processes to effectively and successfully allow Momentum to deliver products to the energy market.

Nigel Clark – CFO: Nigel has overall responsible for the operational functions encompassing finance, billing and transfers, pricing and trading, and systems analysis. This spread of responsibility covers both functions of a day to day basis as well as those of a more strategic perspective looking out over a longer time period.

Nigel has over 15 years experience in management, bringing valuable gas and electricity experience from TRUenergy where he headed the Strategy and Business Development function within the Retail Division and previously was the Electricity Strategy Manager within the Portfolio Management Function. Prior to joining TRUenergy Nigel had a long and accomplished career within Alcoa working in managerial positions covering accounting, finance, commercial, procurement, treasury and business development.

Ian MacDonald – Financial Controller: With a long involvement in the energy industry spanning both sides of the Tasman, Ian is responsible for implementation of the structures and procedures that underpin the short and long term financial health of the business.

After gaining his qualifications, including as a Chartered Accountant, Ian joined the Electricity Corporation of New Zealand with responsibilities covering 13 power stations, transmission network, and design & construction projects. After moving to Contact Energy on its formation he joined ABB as Financial Controller for power station construction in Taranaki and was later seconded to projects in Australia. Following this he joined Duke Energy International and was responsible for the financial management of Power Operations in Australia, New Zealand and Indonesia.

Patrick Harnett – GM Corporate: Patrick has approximately two decades experience in the energy industry working in senior roles managing wholesale and retail businesses, including seven years of involvement in Momentum Energy. This involvement spans both electricity and gas markets, their design, operation and use in delivering to end-users.

Within Momentum, Patrick's role is varied as it has covered many distinct functions including licensing, management of wholesale purchasing, risk management, contract payments, retail price setting/quoting, audit of customer processes, and aspects of managing our involvement with regulation and compliance. Currently Patrick is involved in the internal gas retailing project, IT governance, fulfils important AFS licence activity for the company and is Company Secretary for the Board.

Board of Directors

The board of directors of the Momentum is responsible for setting the objectives of the Momentum and developing strategies for achieving those objectives. The Board also sets the policy framework for Momentum, and monitors the ongoing performance and its senior management. The board currently comprises:

Bryan Mogridge: Bryan has more than 20 years of relevant experience as a CEO, building and rebuilding businesses, using global expansion, scale and brand development, plus active management as the primary tools to enhance shareholder value. Since 1984 he has been a director of a number of publicly listed companies and also private companies, many as Chairman. He has been Chairman of Momentum since July 2004.

Bryan holds a B.Sc and his achievements have been recognized with appointment as an Officer of the New Zealand Order of Merit (ONZM).

Kory Fagan: Representing Momentum Energy's cornerstone shareholder, Kory has been involved in the New Zealand private equity markets since 1996. Kory's background is in venture capital, private equity, and investment banking with key roles including General Manager for Brent Wheeler & Co, an Auckland based boutique investment banking firm and manager at Ernst & Young heading up the Business and Intangible Asset Valuation service line.

Kory joined Direct Capital in 2000 where his primary focus is managing investment activity in Direct Capital's TMT Ventures (including Momentum Energy) and Carter Holt Harvey corporate venturing programmes. He has been TMT's appointee on the Board since July 2004.

Michael Evans: Michael is Chairman of Europe based investment bankers Evans Randall, completing major financial transactions including cross-border, structured finance and principal financing. Prior to the founding of the firm in 1993 he was a Managing Director at the Summit Group Plc and a Director of Babcock and Brown.

Michael holds a B.Sc. Honours and an MBA from Cranfield School of Management, where he specialised in finance and marketing. He has been awarded the Diploma of, and is a member of, the Chartered Institute of Marketing. He has been a Momentum Director since July 2004.

Brook Paterson: Brook is currently resident in Auckland and is involved in the development of a technology/telephony business focused on the USA market. He is a director and prime owner/beneficial owner of several companies including Broana Investments Limited and Pursuance Limited. He has a Bachelor of Commerce (Otago) and is a member of the Institute of Chartered Accountants of New Zealand. He was appointed to the Board of the New Zealand company on its incorporation in New Zealand in March 2004, but has been involved in the business since its early concept phase in 2000.

Ron Diack: Ron is based in Wellington, has a Bachelor of Commerce degree from Victoria University Wellington, and is a Chartered Accountant. Since leaving Bank of New Zealand in 1997 after 23 years, he has operated a financial consultancy company which has concentrated on advisory work and raising debt finance for major projects and corporate clients totalling in excess of NZ\$500 million. He is a director of a number of New Zealand finance subsidiaries of major overseas companies. He is also a director of a number of local private companies. While at Bank of New Zealand he was almost exclusively involved in corporate finance and investment banking leading a team of some 50 persons.

Ron has been involved with Momentum since 2002 and its early stages of development, formally joining the Board of Momentum in March 2004.

Contracts and Arrangements, Outsourcing, Supplier and Customer Contracts

Momentum Energy conducts its core business functions in-house in its facilities located in Melbourne. These functions include sales, customer service, billing, customer transfers, pricing and wholesale market operations. As such, there are no outsourced arrangements relevant to this application.

Licence Being Sought

Momentum Energy is seeking a standard Gas Retail Licence without special conditions to complement its existing energy operations. We propose to commence gas retailing once all requirements are completed including the completion of the Gas Safety Case, acceptance by VENCORP as a gas market participant, and suitable access arrangements with gas network operators. Accordingly, the licence should apply from late August 2007.

The majority of customers to be supplied will consume less than 1 TJ, thus retail gas products will be available to the majority of the domestic and commercial market. However, it is expected that some industrial customers will avail themselves of the Momentum offer and may use greater than 1 TJ per year, therefore the licence will cover both small and large gas customers.

Customers across the State will be eligible to be Momentum Energy customers and we are not expecting to place unnecessary restrictions on customer choice by unnecessarily excluding segments of the gas market.

Other Licences Held

Momentum currently holds a gas licence for South Australia.

Retail licences for electricity are held in Victoria, South Australia, Queensland and New South Wales.

Momentum do not have “associates” that hold licences as defined by the Corporations Act, nor have non-standard licence conditions been applied for any applications for retail licences been declined.

Section 2: Facilitating the Objectives under the ESC Act (2001)

Momentum Energy understands that the Commission's primary objective is to protect the long term interests of Victorian consumers with regard to price, quality and reliability of essential services. Accordingly, Momentum believes that the granting of a gas retail licence is consistent with the Commission's objectives as set out in Section 8 of the Essential Services Commission Act 2001 (Vic). Our current demonstrated ability to operate a successful energy retail business in Victoria and other States is evidence of features that are consistent with the Commission's objectives, namely:

- Energy retailing is the core business activity of Momentum.
- Momentum has demonstrated its ability to participate successfully in a highly competitive retail market.
- A demonstrated technical capacity to build and integrate systems required to support a significant retail business and customer base.
- Operation within the regulatory framework across multiple jurisdictions, applicable legislation and market operators.

Specifically, in relation to the Commission's facilitating objectives under the Essential Services Commission Act 2001 (Vic), we comment as follows:

To promote the development of full retail competition

Momentum's inclusion as a participant will enhance competition in the Victorian retail market. Providing a competitive outcome and choice to consumers is the fundamental basis on which Momentum has based its business. While Momentum may be a new participant in the Victorian gas sector, our expertise and management in customer focused, deregulated energy markets will enhance the FRC offering made to customers. Further, the staff skill sets available are able to contribute lessons from highly competitive energy market environments from the past decade of substantial structural change and observed the evolving competitive environment in Australia.

Protect the long-term interests of Victorian consumers

Adherence to the guidelines related to energy marketing, customer switching and customer support underpins the relationship between Victorian consumers and Momentum. Supporting the objective to protect the interests of consumers, Momentum will offer gas under sustainable tariffs with the necessary customer support to deliver '*a great choice*' to customers over the long-term. Closely related issues are the transfer of customers with the necessary explicit informed consent processes and the ongoing customer relationship, delivering services and protecting the customer information from unauthorised release or misuse.

Assisting with customer protection is Momentum's membership of the EWOV scheme since 2004. Momentum's work both directly with customer issues and cases referred by EWOV for investigation have assisted with efficient processes for addressing customer concerns.

Facilitate efficiency in regulated industries and incentives for efficient investment

The introduction of an additional gas retailer into the Victorian economy will facilitate efficient market outcomes due to increased customer choice and competition. Efficiency in investment decisions is expected to occur amongst consumers and also amongst competing energy retailers.

Where possible, Momentum seeks to expand the opportunities for customer choice by addressing competitive barriers. These include identified instances where they have been imposed by default processes in market operations or under the regulatory guidelines.

Facilitate the financial viability of regulated industries

The addition of Momentum as a new competitor in the gas industry should enhance the capability and viability of those companies able to effectively operate in a competitive environment.

Prevent misuse of monopoly or non-transitory market power

By having new entrants in the retail market for gas and energy in general, Momentum adds to the diversity of suppliers and reduces the dominance and ability of participants that might seek to use a dominant position for anti-competitive outcomes.

Facilitate effective competition and promote competitive market conduct

The core concept behind Momentum's entry into the Victorian market is predicated on a competitive retail process within a competitive market. By undertaking an effective role in the retail end of the energy market Momentum seeks to continue innovation in retail product design and set high benchmarks for its processes and conduct.

Ensure that consumers benefit from the gains available from competition and efficiency

The tariff structures and targeted service levels are intended to provide competitive benefits over and above those of the current retail participants.

Promote consistency in regulation between States

Momentum is mindful of the jurisdictional and operational differences across the different States for energy retailing. The energy retail platform that has been developed, by necessity, takes inter-State differences into account. However, on occasion it is possible to assist with market and regulatory framework design by drawing on the experience of other jurisdictions to facilitate more efficient outcomes.

Section 3: Financial Viability and Capacity

Momentum Energy has provided Commercial in Confidence information to the ESC on its financial capacity.

To date, Momentum has demonstrated its ability to operate a financially viable and successful electricity retail operation in the National Electricity Market. This includes meeting all of the prudential requirements of the NEM and of the distribution companies.

Momentum would not consider undertaking an entry into the Victorian gas market without the necessary funding. Accordingly, the company is capitalised to meet the cash commitments for the addition of gas retailing to the company.

Earnings History, Balance Sheet Structure:

Momentum Energy has provided Commercial in Confidence information to the ESC on its earnings history and balance sheet structure. The company is cash funded and does not expect to carry any significant level debt on its balance sheet in the short or medium-term.

Business Plan of Operations Supporting Financial Capacity

Momentum Energy has provided Commercial in Confidence information to the ESC on its business plans in relation to financial capacity.

Section 4: Technical Capacity

Momentum has previously demonstrated the technical capacity to create and run a successful retail electricity business. This includes all of the activities necessary to establish a fully functioning entity from scratch, including putting in place adequate financial resources, operating with the regulatory and compliance framework of the Australian energy market and relevant legislation. Momentum's staff and Directors provide the energy industry expertise and direct retail business experience that will enable Momentum to operate an effective business spanning gas and electricity. This comes from:

- First hand experience in both founding and operating a start-up energy trading business in a fully contestable market,
- Having the necessary disciplines required to construct a business capable of growing a viable customer base,
- Prior experience in implementing policies, processes and systems, including those necessary to deliver retail energy products to domestic and commercial customers in a deregulated environment,
- Operational knowledge of the customer service systems required to service competitive retail markets.

As an existing retailer in the energy market, Momentum has established its track record with respect to putting in place supplier arrangements and interaction with industry bodies including NEMMCO and electricity network companies.

On the customer side of the business, it is a key requirement that retail accounts can be established and managed. Momentum has put in place the necessary systems to undertake billing, collections, and customer services.

Processes are established allowing internal report for the day-to-day management of the business, and also formal reporting to the Board. The natural extension of this discipline is the formal external audit and reporting to shareholders.

Details of Experience and Knowledge of the Gas Industry.

The original formation of Momentum focused on the electricity side of the energy industry due to the deregulation timetable that was in place. However, the intention, included in the original formation of the company anticipated that gas retailing would be added to the core energy business when appropriate. Therefore, we have been mindful of the experience that many of our staff have in the energy industry, spanning gas and electricity involvements.

Specific experience within the company currently encompasses wholesale contract trading, gas supply contract formation, performance and settlement, customer service, metering and billing. In addition, we have contracted support with our billing/CRM platform for gas retail functionality.

In the wider industry context, Momentum has available experience covering the structure of the gas industry in Australia and several other overseas jurisdictions. This includes assessment of development economics, transmission and transport issues including capacity constraints, quality considerations and consumer demand.

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

Momentum has reviewed the licence conditions that are likely to be imposed on its operations. We note those conditions, anticipate and accept that they will form part of Momentum's licence. In support of our application for a gas retail licence, we provide additional information on our compliance and risk processes on a Commercial in Confidence basis in appendix 1. This includes the Compliance Policy approved by the Board and adopted by the company.

In the implementation of the additional capability to meet the needs of gas retail operations, Momentum has committed staff and financial resources to the areas of billing, customer service, wholesale market participation, metering processes, transfers, use of network services, and dispute resolution.

Within the business operations, a necessary focus is adherence to the retail guidelines, particularly with respect to the sales and marketing functions. This places strict performance measures on the training of the sales and customer service teams to meet the requirements of the ESC guidelines for marketing and to make the initial customer contact as positive as possible. Similarly, issues on customer support, credit and billing system requirements have been anticipated and incorporated into the systems used internally. Naturally these systems will hold customer information confidentially. Where information is required to be transferred between systems and suppliers to enable correct settlements and planning to be completed, this is performed anonymously where possible.

Related to the legislative compliance, Momentum acknowledges that the Retail Licence requires membership of a dispute resolution scheme. This is satisfied by our continuing membership of the Energy and Water Ombudsman of Victoria. Issues of disputes and complaint handling procedures are included in appendix 1.

Momentum is not aware of any significant impediment that would prevent it from effectively operating in the gas retail market.

If the applicant is to rely on another entity to provide staff and resources.

Momentum is not intending to contract-out core operational processes that are fundamentally important to the business. These functions include billing, customer service, and call centre support.

Momentum anticipates that the service provision roles covering metering, meter reading and data management will be contracted on normal commercial terms. Similarly, the arrangements with the distribution companies for use of their networks and our billing software supplier will be on commercial terms.

The company does not expect to enter into non-commercial arrangements with another party, or with any entity unable to adequately perform the tasks related to Momentum retail activities in the Victorian market.

Wholesale Market – Registration with VENCORP

Momentum is currently in the process of arranging registration with VENCORP as required under the Market and System Operations Rules.

As a participant, Momentum agrees to the financial and procedural requirements of VENCORP and will not participate in the Victorian gas market until fully registered. For the avoidance of doubt, this includes the obligations relating to the posting of credit security to cover the financial exposure resulting from trading activities and funds for these purposes have been identified as part of our business plan.

MSO Rules

Further to the details above, for the avoidance of doubt Momentum acknowledges the requirements of and agrees to abide by the rules and procedures of the Market and System Operation Rules. Prior experience has demonstrated the value of a full understanding and appreciation of energy market rules. Compliance with the rules is therefore considered a high priority within the business, as is compliance with Momentum's other regulatory and legal obligations.

Supply Contracts, Settlement of Gas Purchases and Network Service Charges

As an incorporated entity, Momentum has full capability to arrange and execute contracts for the supply of gas and other services. We have demonstrated this capability with current counter-parties for the supply of network services, energy and risk management products.

In terms of accounting for and determining the correct settlement of gas and network charges Momentum operates a settlements process linking customer usage through to wholesale supply. Linking individual customer consumption as recorded in our billing database to network service charges, and metered volumes assists in identifying customer or other issues early. At the supply side, the total volumes purchased and billed are reconciled to sold volumes. This information is incorporated into our financial systems and has been successfully used to identify supplier or customer transfer problems.

Gas Safety Case

Momentum is aware that it is required to complete a Gas Safety Case before retailing gas in Victoria as per Section 37 of the *Gas Safety Act* (Vic) 1997. Momentum is in the process of preparing its Gas Safety Case to ensure that all requirements are met and are fully understood by our staff. Momentum will not commence gas retailing until its Gas Safety Case is accepted by Energy Safe Victoria and all other necessary elements required are in place. Momentum will comply with its Gas Safety Case and will ensure that periodic updates are completed as required.

Community Services Agreement

As a licensed Victorian electricity retailer, Momentum is already a party to a Community Services Agreement with the Department of Human Services (DHS). As such, Momentum is fully aware of its obligations in relation to the agreement and will ensure that, in conjunction with DHS, that all eligible customers receive their full entitlements in relation to their gas consumption.

Risk Management Strategy:

The core function of the wholesale side of the Momentum business is the management of risk in the energy market. To deal with this aspect of the business, Momentum has retained the services of an experienced energy risk manager. As well as putting in place appropriate systems to manage the settlement risks inherent in the electricity market, Momentum secures hedging contracts that remove elements of price and volume risk from its operations. These contracts are used to manage financial exposure to the fluctuations in the energy markets, and assist in minimising financial exposures.

By entering into derivatives contracts, Momentum is covered by the Financial Services Reform Act and obtained its Australian Financial Services (AFS) licence in 2004.

As a fundamental part of operations, Momentum has a well defined risk policy. This Board approved policy stipulates compliance, reporting and processes. In particular, risk reporting is one of the key reports provided to the Board on a monthly basis. Additionally, the Board has appointed an independent external expert to periodically review and report on the performance, systems and capability in the area of energy risk management.

Network Access Agreements

Momentum has reviewed the default use of system agreements offered by the gas network companies operating in Victoria. Given our experience with similar agreements, at this time Momentum sees no impediment to the execution of network access agreements and treats a properly executed agreement between the parties as an important condition precedent before commencing trading on any network.

Sales & Marketing

Momentum is familiar with the Fair Trading Act, the Marketing Code of Conduct and Energy Code and agrees to abide by the conditions and fulfil its obligations. As a current energy retailer in the Victorian market, the extension of our product range to include gas retail provides a useful opportunity to refresh training and skills for staff within the company.

Within the sales process, it is important to provide customers with adequate information to enable an informed choice. This includes the provision of product pricing, our customer contract and charter, and taking the time to address any questions that the customer might have. This material explains the terms and conditions of the contract, pricing, Momentum's obligations, meter reading and billing arrangements, privacy of information, rights to terminate and exercise of "cooling off", payment methods, concessions eligibility and how to contact Momentum in the event of a query or complaint. This material is prepared in accordance with the Energy Retail and other applicable codes.

Care is taken to ensure that the customer correctly consents to energy supply from Momentum either via written acknowledgement or voice recording in the case of sales via telephone. This acceptance forms an integral part of the customer information and establishment of the relationship between Momentum and the customer.

Customer Transfers/Switching

Momentum is familiar with the operation of customer transfers and the issues involved. The available processes include a large degree of automation allowing exception handling to correct any errors that might occur or when circumstances require manual intervention, such as after-hours or urgent reconnection of supply.

Customer Establishment

Associated with the customer transfer process is the establishment of a customer account. This includes the recording and retention of customer information in our customer information management system.

Customer information is held securely and with restricted access. This includes requiring customers to adequately identify themselves before disclosure of information about their account.

Care is taken to ensure that correct information for each account is held. This is aided by input field verification at time of initial data entry, and reconfirmation of details via times of customer contact.

Account closure occurs when a customer moves to another retailer or vacates a site. On notification, the subsequent meter reading is used to create a final bill within the customer's billing cycle. With a nil account balance, the account would be closed, typically within the next month.

Customer Communications

The requirements of the Retail, Marketing and Customer Transfer codes set out many of the minimum requirements relating to the marketing, sale and treatment of customers including confidentiality of information supplied and the gaining of consent. Adding to these are the requirements under corporations law and the fair trading act. Momentum has noted these requirements in its processes and endeavours to exceed these requirements in its dealings with current and prospective customers.

As a customer orientated business, Momentum recognises both the importance of good service and products to ensure the success of the relationship and to provide value in a competitive environment. The company has an established contact centre based at its offices in Melbourne to handle customer inquiries and deliver the level of service that customers in a competitive environment deserve. Facilities allow access to a customer's full account history, contract terms, previous queries and concerns, copies of accounts as issued and recording of complaints.

Associated with the operation of a telephone based support and service centre is the ability and procedures necessary to handle written correspondence, collection of performance measures, and audit of those measures. From our involvement with EWOV and prior experience handling customer issues, Momentum has assigned staff to resolve issues and proactively incorporate improvements back into the operational systems of the company.

During 2006 and early 2007, an important development in our customer care operations was the implementation of our inquiry/complaints recording system. This assists in identifying specific issues and trends, and addressing the causes of dissatisfaction. Reports from this valuable tool are provided to the senior management and summarised as part of Board reporting.

Meter Reading and Data Services

Momentum intends to use an agent to perform metering and meter reading. These arrangements will be similar to the mode of operation used in the electricity side of the business. Performance standards with our preferred supplier of service will require that an actual reading from each meter is supplied at least annually.

Customer Billing/Systems

Momentum has implemented a proven billing system that has flexibility in billing retail energy customers. The system provides data links and audit facilities to aid the settlements and reconciliation function previously mentioned. Built to handle both the gas and electricity mass-market, the system is used by several participants in the Australian market, including Victoria.

Our experience with our billing system is that it is capable of performing the function required, namely the production of compliant, accurate energy bills for customers. We have established robust procedures that take into account differing bill cycles according to customer requirements and provide a range of payment options to our existing energy customers.

Customer payments are recorded for each account. Reporting on payments and payments history allows for management of outstanding amounts, the implementation of payment plans and if necessary, debt recovery.

Management Reporting and System

Managing an energy business requires attention to detail on all aspects across a wide spectrum of issues. There are many critical areas where systemic or random failure has the potential to adversely affect the customer experience or the efficient processes of the company. Momentum is fully aware of the need for informed decision making and has undertaken significant work in refining the reporting tools and key metrics on operations.

Momentum has statutory reporting requirements under its energy licences in a number of jurisdictions. It has a formal requirement for external financial audit and in managing its obligations under the Financial Services Licence. These complement our regular internal monitoring of covering sales performance, finance, regulatory compliance, risk management and customer metrics.

An area that is in the process of being improved is the population of our documentation repository to provide easy and clear access to all company documentation. This project is collating the documentation produced in the individual functional groups, and placing policy and procedures on the central computer network.

As previously stated in this application, there are several important reporting avenues from the company to the Board. The review of operations and oversight that the Board provides allows significant expertise to be allied to the critical success factors for a retail business. Accordingly, the strong discipline of reporting and performance indicators currently exists.

Technical Capacity Summary

Momentum has the management expertise, operational skills, established processes, proven IT systems and financial backing to operate a financially sound and competent energy retail business.

Section 6: Miscellaneous Provisions

Licence Conditions

Momentum is not seeking any non-standard licence conditions.

Cross-Subsidisation and Ring-fencing

Momentum has no intention of cross-subsidising its retail operation in Victoria. Momentum has no ownership or relationship with a 3rd party that would enable the cross-subsidisation of its retail operation. Momentum intends to attribute services and resources incurred by the retail business and account for these items in its retail business conducted in Victoria.

Confidentiality

Momentum agrees to this application being made publicly available except for the information provided in the attached schedules that provide detailed information regarding Momentum's financial projections and application of technical capacity to operate a retail business.