

9 May 2014

The Executive Officer  
Utilities Commission of the Northern Territory  
GPO Box 915  
Darwin NT 0801

Dear Executive Officer,

**Subject: Application for a Licence to Carry on Operations in the Northern Territory Electricity Supply Industry**

Pursuant to the *Electricity Reform Act*, *Electricity Reform (Administration) Regulations*, *Utilities Commission Act*, *Electricity Networks (Third Party Access) Act* and *Electricity Networks (Third Party Access) Code*, Rimfire Energy Pty Ltd ("Rimfire Energy") hereby applies to the Utilities Commission of the Northern Territory to be granted an electricity retail licence for the purpose of carrying on operations in the Northern Territory.

More specifically, Rimfire Energy is applying for a licence to trade and sell electricity to contestable customers within the Northern Territory electricity supply industry.

Rimfire Energy requests the licence to be issued with an effective issue date of 1 June 2014, so as to allow for an operational commencement date of 1 July 2014. Additionally, Rimfire Energy is applying for the licence to be issued with no specific term.

Rimfire Energy notes the views of the Utilities Commission of the Northern Territory (the "Commission") with regard to adopting a non-prescriptive form for licence applications. We can confirm that the detailed information contained in the **attached** *Application for a Licence to Carry on Operations in the Northern Territory Electricity Supply Industry* is provided based upon the specific information requirements set out in the current version of the Utilities Commission's Licencing Manual, including the following major subject areas (amongst others):

- Legal Identity;
- Contact Details;
- Licence Type;
- Licensee Details;
- Nature of Industry Participation;
- Technical Capacity; and
- Financial Viability.

As discussed, we also note that we have reviewed the information contained in the current version of the Licence Fees Schedule and request that an invoice for the application fee be sent to Rimfire Energy Pty Ltd.

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**Rimfire Energy Pty Ltd**

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*fire up your business*

Rimfire Energy is pleased to submit this licence application and we look forward to the opportunity of further meetings with the Commission to discuss this application in greater detail at an appropriate time if required. Should the Commission have any questions or require any further information in order to positively assess Rimfire Energy's suitability to be granted the licence for which it has applied and to determine the specifications of the licence conditions to apply, please notify us accordingly.

Regards,



**Warwick Lyon**

Chief Executive Officer

Rimfire Energy Pty Ltd

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# Application for a Licence to Carry on Operations in the Northern Territory Electricity Supply Industry

Information Area	Application Requirements per the Licencing Manual	Responses from Rimfire Energy
<b>Legal Identity</b>	Applications should provide: <ul style="list-style-type: none"> <li>the full legal name of the applicant</li> <li>the ACN</li> <li>the registration jurisdiction</li> </ul>	Rimfire Energy provides the following details regarding its legal identity: <ul style="list-style-type: none"> <li><b>Company name</b> Rimfire Energy Pty Ltd</li> <li><b>ACN</b> 160 378 941</li> <li><b>State of Incorporation</b> The Certificate of Registration <b>attached</b> at <b>Appendix B</b> confirms that the company is registered in the State of Queensland.</li> </ul>
<b>Contact Details</b>	Applications should provide: <ul style="list-style-type: none"> <li>the name and title of a nominated contact officer</li> <li>their telephone, facsimile and/or e-mail details</li> <li>a postal address</li> <li>a street address</li> </ul>	Rimfire Energy provides the following details regarding its nominated contact officer: <ul style="list-style-type: none"> <li><b>Contact</b> Warwick Lyon Chief Executive Officer Rimfire Energy Pty Ltd</li> <li><b>Telephone</b> (07) 3010 9355</li> <li><b>Mobile</b> 0409 260 392</li> <li><b>Email</b> <a href="mailto:wlyon@rimfireenergy.com.au">wlyon@rimfireenergy.com.au</a></li> <li><b>Physical Address</b> Level 5, 320 Adelaide Street, Brisbane, Qld, 4000</li> <li><b>Postal Address</b> GPO Box 1636, Brisbane, Qld, 4001</li> </ul>
<b>Licence Type</b>	The applicant must state: <ul style="list-style-type: none"> <li>the type of licence they are seeking</li> <li>the proposed date (if any) which the applicant seeks to have the licence issued by</li> <li>details of the facilities and the area concerned (as applicable) in which the licence activities are to be carried on</li> <li>the term (in years) for which they wish the licence to be granted</li> </ul>	Rimfire Energy provides the following details regarding its proposed licence type: <ul style="list-style-type: none"> <li><b>Licence Type</b> Rimfire Energy is applying for a retail electricity licence to trade and sell electricity.</li> <li><b>Proposed Issue Date</b> Rimfire Energy requests the licence be issued with an effective date of 1 June 2014 so as to allow the company to commence operations as of 1 July 2014.</li> <li><b>Customer Type</b> Rimfire Energy is applying for the retail electricity licence for the purpose of selling electricity to contestable electricity customers.</li> <li><b>Geographic Area</b></li> </ul>

		<p>Rimfire Energy is applying for the retail electricity licence for the whole of the Northern Territory, including the grid connected network regions of Darwin-Katherine, Tennant Creek and Alice Springs.</p> <ul style="list-style-type: none"> <li> <b>Details of Facilities</b>  Rimfire Energy's relevant facilities relate to those facilities ordinarily used to carry on operations as an electricity sales business, including financial and operating IT systems for customer site and contract data management, meter data management, billing, collections and customer accounts management. </li> <li> <b>Term</b>  Rimfire Energy is applying for the retail licence to be issued for an indefinite term. </li> </ul>
<b>Licensee Details</b>	<p>The applicant must show that:</p> <ul style="list-style-type: none"> <li>they are a resident in Australia and have the capacity to be sued in their own name in an Australian Court</li> <li>they are not under external administration</li> <li>they have a financial situation commensurate with their potential financial exposure</li> </ul> <p>The applicant should include a copy of the applicant's Certificate of Registration of the company.</p> <p>If the applicant is a wholly owned subsidiary of another company, or one of a group of related companies, summary information about the parent company and the ownership structure of the related companies should be provided.</p> <p>The directors, senior management and major shareholders of an applicant should be made known to the Commission.</p>	<p>Rimfire Energy provides the following details regarding its status as a proposed licensee:</p> <ul style="list-style-type: none"> <li> <b>Residency Status &amp; Certificate of Registration</b>  A current copy of the ASIC company extract is <b>attached</b> herewith at <b>Appendix A</b> and shows that Rimfire Energy and its directors are resident in Australia. Additionally, a copy of the Certificate of Registration of Rimfire Energy Pty Ltd is <b>attached</b> herewith at <b>Appendix B</b> and confirms Rimfire Energy is an Australian company. </li> <li> <b>Administration or Bankruptcy Status</b>  The ASIC company extract <b>attached</b> herewith at <b>Appendix A</b> shows that Rimfire Energy Pty Ltd is not under administration. </li> <li> <b>Financial Situation Status</b>  Rimfire Energy Pty Ltd enjoys a financial situation that is commensurate with its potential financial exposure and its directors reasonably believe that the company will be able to meet its obligations in the market as and when they become due. Further details are provided <b>below</b> at the information area titled <b>Financial Viability</b> and as <b>attached</b> herewith at <b>Appendix G</b> and <b>Appendix H</b>. </li> <li> <b>Corporate Structure &amp; Shareholding</b>  Rimfire Energy Pty Ltd is a member of a wholly owned group of related entities, with Rimfire Energy Pty Ltd being a wholly owned subsidiary of Venture Downs Pty Ltd. An annotated corporate structure diagram is <b>attached</b> herewith at <b>Appendix C</b>, including ownership, history and business descriptions. </li> <li> <b>Directors &amp; Executive Management</b>  Rimfire Energy Pty Ltd has appointed Michael Joseph Allen and Warwick Creighton Lyon as executive directors of the company. Further details regarding the directors are provided <b>below</b> at the information area titled <b>Technical Capacity</b>. </li> <li> <b>Other Matters</b> </li> </ul>

		<ul style="list-style-type: none"> <li>○ The directors confirm that there has been no enforcement actions or enforceable undertakings taken against the directors over the past 10 years.</li> <li>○ The directors confirm that there have been no previously revoked licences held by the directors in any industry, nor any failed licence applications in any industry.</li> <li>○ The directors confirm that there have been no past or present administrative or legal actions in relation to an authorisation or licence in any industry.</li> <li>○ The directors confirm that they have no unspent criminal convictions.</li> <li>○ The directors confirm that Rimfire Energy has complied with its obligations to provide worker's compensation insurance for the company's employees for the 2014 financial year of insurance, with such insurance policy being with WorkCover Queensland.</li> </ul>
<b>Nature of Industry Participation</b>	<p>The applicant should:</p> <ul style="list-style-type: none"> <li>• provide general information about its existing activities, both within and outside the electricity industry;</li> <li>• summarise the reasons why the applicant intends to participate in the Northern Territory electricity industry and the broad nature of that participation;</li> <li>• explain how the granting of a licence would be consistent with those requirements.</li> <li>• The objectives of the Utilities Commission Act ("UCA"), as set out in section 6(2), are stated to be:             <ul style="list-style-type: none"> <li>(a) to promote competitive and fair market conduct;</li> <li>(b) to prevent misuse of monopoly or market power;</li> <li>(c) to facilitate entry into relevant markets;</li> <li>(d) to promote economic efficiency;</li> <li>(e) to ensure consumers benefit from competition and efficiency;</li> <li>(f) to protect the interests of consumers with respect to reliability and quality of services and supply in regulated industries;</li> <li>(g) to facilitate maintenance of the financial viability of regulated industries;</li> </ul> </li> </ul>	<p>Rimfire Energy provides the following details regarding the nature of its industry participation:</p> <ul style="list-style-type: none"> <li>• <b>Existing Activities</b> Rimfire Energy is a newly established business and has no existing operational activities within or outside the electricity industry, however the business is currently undertaking a wide variety of start-up activities to successfully launch its electricity sales business, including setting up its offices and IT platform, establishing bank accounts and professional relationships, as well as setting up corporate governance frameworks, risk management frameworks, corporate policies, accounting systems etc.</li> <li>• <b>Proposed NT Participation</b> Rimfire Energy intends to participate in the Northern Territory electricity industry as an electricity sales business selling to contestable electricity customers.</li> </ul> <p>The reasons for Rimfire Energy's interest in participation in the Territory as described above is to provide electricity sales competition in the NT electricity supply industry and offer legitimate choice to customers. Despite many years of deregulation and contestability in the large customer segments, there has been limited competition available to these customers.</p> <ul style="list-style-type: none"> <li>• <b>Alignment with Legislative Objectives</b></li> </ul> <p><u>Facilitate Market Entry</u> The granting of a licence to Rimfire Energy to carry on operations in the NT electricity supply industry will permit a new entrant electricity retailer to enter the market and allow it to begin competing in contestable electricity sales.</p>



	<p>and</p> <p>(h) to ensure an appropriate rate of return on government assets.</p> <ul style="list-style-type: none"> <li>• The objectives of the Electricity Reform Act (“ERA”), as set out in section 3, are stated to be: <ul style="list-style-type: none"> <li>(a) to promote efficiency and competition in the electricity supply industry;</li> <li>(b) to promote the safe and efficient generation, transmission, distribution and selling of electricity;</li> <li>(c) to establish and enforce proper standards of safety, reliability and quality in the electricity supply industry;</li> <li>(d) to establish and enforce proper safety and technical standards for electrical installations;</li> <li>(e) to facilitate the maintenance of a financially viable electricity supply industry; and</li> <li>(f) to protect the interests of consumers of electricity.</li> </ul> </li> </ul>	<p>This is consistent with the objectives stated in s.6(2)(c) of the UCA to facilitate entry into the NT electricity supply industry.</p> <p><u>Promote Competition &amp; Efficiency</u></p> <p>As a competing retailer selling electricity to contestable customers, Rimfire Energy will need to demonstrate a variety of:</p> <ul style="list-style-type: none"> <li>○ competitive product diversity through creative contract structures (given that electricity is a homogenous commodity);</li> <li>○ competitive product pricing; and/or</li> <li>○ competitive customer service.</li> </ul> <p>Each of these criteria, whether in isolation or any combination, represents a significant improvement in the status quo regarding retail competition and efficiency within the NT electricity supply industry, and therefore helps to maximise the potential benefits to consumers arising from the deregulated electricity markets in the Territory.</p> <p>As such, the granting of a licence to Rimfire Energy is consistent with the objectives stated in s.6(2)(a), (d) and (e) of the UCA, and s.3(a) of the ERA, to promote competition, efficiency and fair market conduct in the NT electricity supply industry.</p> <p><u>Monopoly Powers &amp; Consumer Interests</u></p> <p>Given that the PWC government owned monopoly dominates the NT electricity supply industry, there is little opportunity for natural competitive forces to drive efficient economic outcomes and put natural constraints around monopolistic market powers. While the Commission has instituted a range of regulated mechanisms, including wholesale and retail price monitoring and oversight, active competition by way of another competing retailer would substantially improve the ability for natural constraints to develop.</p> <p>As such, the granting of a licence to Rimfire Energy is consistent with the objectives stated in s.6(2)(b) of the UCA, and s.3(f) of the ERA, to prevent misuse of monopoly and market power in the NT electricity supply industry and protect the interest of consumers of electricity.</p> <p><u>Reliability &amp; Quality of Supply</u></p> <p>As Rimfire Energy will be contracting with PWC Generation and PWC Networks for them to generate and distribute the electricity needs of Rimfire Energy’s customers, such generation and distribution would be carried out in accordance with the relevant current requirements (including various safety and technical codes) in precisely the same manner as it would be for any other retail business, including PWC Retail as is the case presently.</p> <p>As such, the granting of a licence to Rimfire Energy is consistent with the objectives stated in s.6(2)(f) of</p>
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		<p>the UCA, and s.3(b) and (c) of the ERA, to ensure the reliability and quality of electricity supply in the NT electricity supply industry.</p> <p><u>Financial Viability of the Electricity Supply Industry</u> Rimfire Energy has provided information <b>below</b> in the section on <b>Financial Viability</b> and as <b>attached</b> herewith at <b>Appendix G</b> regarding the financial viability of the business. As a financial viable business, Rimfire Energy is in a strong position to sustain itself during establishment and commence its operations.</p> <p>As such, the granting of a licence to Rimfire Energy is consistent with the objectives stated in s.6(2)(g) of the UCA, and s.3(e) of the ERA, to ensure the financial viability of electricity supply in the NT electricity supply industry.</p> <p><u>Protect the Interest of Consumers</u> Overall, electricity consumers will stand to benefit from another competing retailer operating in the NT electricity supply industry. With another financially viable retail participant competing on product, price and customer service, utilising existing PWC generation and network services, the interests of electricity consumers and the electricity industry as a whole will be protected.</p> <p>As such, the granting of a licence to Rimfire Energy is consistent with the objectives stated in s.3(f) and of the ERA, to protect the interests of consumers of electricity in the NT electricity supply industry.</p>
<b>Technical Capacity</b>	<p>Applicants must show that they have the technical capacity to comply with the likely conditions of the licence and any associated codes and guidelines published at the time.</p> <p>In order to demonstrate technical capacity to the Commission, applicants should provide:</p> <ul style="list-style-type: none"> <li>• details of their experience in and knowledge of the electricity industry;</li> <li>• a summary of the skills and experience of the directors and senior managers, and their relevance to meeting the requirements of the licence;</li> <li>• evidence that the applicant has the capacity to comply with the licence conditions, codes and guidelines relevant to its application;</li> <li>• if the applicant is to rely on another entity to provide staff and resources, a</li> </ul>	<p>Rimfire Energy provides the following details regarding its technical capacity:</p> <ul style="list-style-type: none"> <li>• <b>Management Skills &amp; Experience</b> <u>Michael Allen – Managing Director</u> Michael brings more than 20 years experience to Rimfire Energy, including as the former Executive General Manager Finance &amp; CFO for ERM Power during its period of rapid growth when it was the fastest growing electricity retailer and the number one developer of new generation capacity in Australia. Michael was directly responsible for raising more than \$1 billion in senior &amp; mezzanine project, corporate and equity finance. He established the internal finance function at ERM Power, including leading the financing for the developers to fund its new generation development projects and as otherwise required to facilitate corporate expansion, including finance to grow its newly established electricity retail subsidiary into one of Australia's largest commercial and industrial electricity retailers. <p>Prior to this, Michael held a variety of senior positions representing energy companies, developers and banks across energy, resources and industry. This includes 8 years based in the Asia region covering projects in 11 countries in</p> </li> </ul>

	<p>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.</p>	<p>Asia, Oceania, Europe &amp; the Americas, including power projects in Australia, China, Thailand, and Indonesia.</p> <p>A copy of Michael's resume is <b>attached</b> herewith at <b>Appendix D</b>.</p> <p><u>Warwick Lyon – Chief Executive Officer</u> Warwick brings nearly 25 years of professional experience to the business in senior and executive roles, across a number of industries, including more than a decade of energy experience in both public and private enterprise across a broad range of disciplines, including operations, finance and risk management.</p> <p>Prior to joining Rimfire Energy, Warwick was the founding CFO for ERM Power's "Business Energy" division. During this time, Warwick played a formative role in overseeing the design, establishment and operation of all aspects of the business, including governance, corporate policy, business strategy, systems requirements, operational processes, risk management, finance, treasury, accounting, reporting and compliance, while the business grew from a start-up to a \$1.5 billion turnover operation within a five year period.</p> <p>Subsequent to his role as founding CFO for ERM Business Energy, Warwick assumed a newly created role as the General Manager of Strategy &amp; Projects for ERM Business Energy and played an integral role in the investigations and decisions to expand into small-to-medium enterprise sales and metering services.</p> <p>Other prior roles include Retail Operations Manager, Operational Risk Manager and Settlements &amp; Accounting Manager at Queensland energy company ENERGEX Limited. In his capacity as Retail Operations Manager, Warwick oversaw the retailer operations activities associated with customer transfers, contracts, data management and customer billing, amongst other things.</p> <p>A copy of Warwick's resume is <b>attached</b> herewith at <b>Appendix E</b>.</p> <ul style="list-style-type: none"> <li>• <b>Capacity to Comply with Licence Conditions, Codes &amp; Guidelines</b> The business has undertaken robust business planning processes and financial modelling, and has implemented suitable frameworks for all key corporate areas, such as governance, risk management, compliance and accounting, including robust corporate policies, processes and systems. These matters are elaborated upon below.</li> </ul> <p><b><i>Business Planning</i></b> Rimfire Energy has undertaken a comprehensive investigation of the opportunities presented in the</p>
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		<p>NT electricity supply industry. Based on these investigations, detailed critical analysis has been performed resulting in the development of a detailed business plan and associated financial model that supports the case for Rimfire Energy to enter the NT electricity supply industry.</p> <p>Further details of Rimfire Energy's business plans are <b>attached</b> herewith at <b>Appendix G</b> regarding the company's financial viability and a copy of the business plan is also <b>attached</b> herewith at <b>Appendix I</b>.</p> <p><b><u>Legal &amp; Regulatory Matters</u></b></p> <p>Rimfire Energy has engaged an expert external commercial lawyer to provide specific advice regarding legal and regulatory matters.</p> <p>Rimfire Energy's legal advisor is a highly respected and experienced specialist electricity industry lawyer with prior experience in the NT electricity supply industry and is familiar with its regulatory framework. Their engagement includes advising on the Territory regulatory framework and compliance obligations, together with advising on the proposed commercial agreements with large customers, PWC Networks and PWC Generation, amongst other things.</p> <p>A copy of the biography of Rimfire Energy's legal advisor is <b>attached</b> herewith at <b>Appendix F</b>.</p> <p><b><u>Corporate Governance</u></b></p> <p>Rimfire Energy has developed a comprehensive Corporate Policy Handbook to direct and govern the manner in which business is to be undertaken by the company and its employees and representatives.</p> <p>The various policies contained in the Corporate Policy Handbook cover all generally recognised policy areas that would apply in a private company corporate environment, including policies for delegations, business conduct, human resources, risk management, compliance, sales and trading.</p> <p>A copy of the Corporate Policy Handbook is <b>attached</b> herewith at <b>Appendix J</b>.</p> <p><b><u>Risk &amp; Compliance</u></b></p> <p>Rimfire Energy has policies and procedures in place regarding enterprise risk, market risk, credit risk and compliance management. In addition to its overarching Compliance Policy, the company also has a specific NT Electricity Customer Compliance Policy that operates as a more detailed sub-policy in relation to the areas of contracting, pricing, billing, transfers, complaints handling and disconnection.</p> <p>The business has also implemented an integrated</p>
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		<p>risk and compliance management system that is compliant with relevant standards on risk management and compliance. The system, called Risk Manager from Incom Pty Ltd, operates as both the enterprise risk register and as the compliance management system where it will be used to record, track and monitor compliance, including reminders when compliance activities are due.</p> <p>Copies of these risk and compliance policies are included in the Corporate Policy Handbook <b>attached</b> herewith at <b>Appendix J</b> and the Enterprise Risk Management Procedures are <b>attached</b> herewith at <b>Appendix K</b>.</p> <p><b><u>Accounting &amp; Finance</u></b> Rimfire Energy has implemented an accounting system that integrates all aspects of the accounting and reporting process, including an integrated CRM system.</p> <p>The company's CEO is an experienced Chartered Accountant and former CFO of ERM Business Energy, a successful electricity sales business start-up, and will oversee the accounting, finance and reporting aspects of the business. Additionally, the company has engaged an external accounting firm to provide advisory services, primarily on taxation matters.</p> <p><b><u>IT Systems</u></b> Rimfire Energy has implemented an advanced technology IT platform utilising state-of-the-art hosted, virtual data-centres. The hosted data servers include multiple levels of redundancy, with daily data backups and automatic real-time failover to a fully replicated redundant datacentre.</p> <p>Based on Rimfire Energy's knowledge of the operations of the NT industry and with the assistance of expert operational resources who are highly experienced in developing the required electricity systems solutions, it is the intention of Rimfire Energy to develop and build the necessary operational systems internally.</p> <p>This includes systems solutions for storing contract and standing data, meter data management, network tariffs and performing billing and settlement calculations. Preliminary scoping for operational system requirements has been conducted based upon publicly available documents, including the network and system technical codes and the B2B service order procedures. The initial systems requirements scoping will be progressed in greater detail following discussions with PWC Networks after the licence is issued and we have the requisite network agreement in place.</p> <p><b><u>Operational Resources</u></b> Rimfire Energy management has identified a</p>
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		<p>number of highly experienced electricity industry resources to assist in the variety of operational activities required to run an efficient and effective electricity sales business. The company anticipates engaging the necessary resources shortly after the issue of the licence.</p> <ul style="list-style-type: none"> <li>• <b>Outsourced Services</b> Other than engaging with specialist consultants and advisors, as mentioned above, Rimfire Energy does not intend to outsource any of its core operational functions.</li> </ul>
<b>Financial Viability</b>	<p>The financial resources available to the applicant should be addressed in appropriate detail. Audited financial reports for at least three years should be provided in the first instance. The requirement for audited reports is waived in the case of newly incorporated bodies, but equivalent information should be provided in relation to the other corporations in the applicant's group.</p> <p>For applicants for retail licences, the Commission will require documentary evidence that the applicant has the necessary financial capability to discharge all financial obligations to the suppliers of wholesale electricity, network access services and metering services that would arise from the reasonably expected sale of electricity by the applicant, including:</p> <ul style="list-style-type: none"> <li>• an investment grade credit rating for long-term unsecured counterparty obligations;</li> <li>• evidence that the applicant has entered into arrangements with a financial institution capable of providing suppliers with acceptable security in the form of a bank guarantee (or an equivalent facility).</li> </ul> <p>In addition, the applicant should provide evidence that they have access to financial resources sufficient to meet the (reasonably expected) standing costs of such arrangements for a period of at least two years.</p>	<p>Rimfire Energy provides the following details regarding its financial viability:</p> <ul style="list-style-type: none"> <li>• <b>Business Planning</b> As mentioned above, Rimfire Energy has undertaken a comprehensive investigation of the opportunities presented in the NT electricity supply industry. Based on these investigations, critical analysis has been performed resulting in the development of a detailed business plan and associated financial model that supports the case for Rimfire Energy to enter the NT electricity supply industry.</li> </ul> <p>Further details of Rimfire Energy's business plans are <b>attached</b> herewith at <b>Appendix G</b> regarding financial viability and a copy of the business plan is also <b>attached</b> herewith at <b>Appendix I</b>.</p> <ul style="list-style-type: none"> <li>• <b>Financial Statements</b> Rimfire Energy is a recently incorporated entity that has been established specifically for the purpose of entering the NT electricity market to commence electricity sales operations. Consequently, the company does not yet have audited financial statements. Additionally, Rimfire Energy's parent is similarly recently incorporated for the purpose of acting as a holding company and also has no audited financial statements.</li> </ul> <p>While Rimfire Energy intends to prepare separate financial statements for the company on a stand-alone basis, as a small private company there is presently no obligation or intention to have the financial statements audited.</p> <p>A copy of Rimfire Energy's most recent management financial statements are <b>attached</b> herewith at <b>Appendix H</b>.</p> <ul style="list-style-type: none"> <li>• <b>Financial Viability</b> Detailed information regarding Rimfire Energy's financial viability is <b>attached</b> herewith at <b>Appendix G</b>.</li> </ul>
<b>Cross-Ownership and Ring-</b>	<p>Applicants should outline:</p> <ul style="list-style-type: none"> <li>• the basis on which services and resources will be</li> </ul>	<p>Rimfire Energy provides the following details regarding cross-ownership and ring-fencing:</p>

<b>Fencing</b>	<p>transacted between relevant operating areas of the applicant, or the applicant and other related entities;</p> <ul style="list-style-type: none"> <li>in the case of applicants that are wholly owned subsidiaries, proposed audit arrangements for the applicant and whether separate reports for the licensed entity and its parent are to be prepared and made publicly available;</li> <li>other guidelines or standards relating to financial separation, ring-fencing, and separate audit arrangements, which the applicant intends to follow.</li> </ul>	<ul style="list-style-type: none"> <li><b>Shared Resources &amp; Services</b> Rimfire Energy intends to operate as a stand-alone business and does not intend to share resources or services with other entities.</li> <li><b>Financial Statement Preparation</b> Rimfire Energy intends to prepare separate financial statements for the company on a stand-alone basis, as a small private company there is presently no obligation or intention to have the financial statements audited.</li> </ul>
<b>Licence Conditions</b>	Where the applicant is seeking particular licence conditions, the nature and reasons for seeking these conditions should be explained.	<p>Rimfire Energy provides the following details regarding licence conditions:</p> <ul style="list-style-type: none"> <li>Rimfire Energy has considered the “Terms Likely to Appear in a Retail Licence” as set out in Appendix C of the Licensing Manual and is ready to consider these and any other conditions the Commission may also seek to impose.</li> </ul>
<b>Exemptions</b>	Where an applicant seeks any regulatory exemptions or modifications, the nature and reasons for seeking these exemptions or modifications should be explained.	<p>Rimfire Energy provides the following details regarding exemptions:</p> <ul style="list-style-type: none"> <li>Rimfire Energy is not seeking any regulatory exemptions or modifications.</li> </ul>
<b>Commercially Sensitive Information</b>	Where the applicant considers information contained in an application to be commercially sensitive, the applicant should clearly identify such information and the reason they regard it as commercially sensitive.	<p>Rimfire Energy considers the information contained in the following appendices to be commercially sensitive and/or private information and requests that the this information be treated as confidential and not made publicly available:</p> <ul style="list-style-type: none"> <li><b>Appendix C : Corporate Structure</b> Rimfire Energy Pty Ltd and its related entities are part of a privately owned group.</li> <li><b>Appendix D : Resume of Michael Allen</b> Michael’s resume contains personal details and other information that is considered to be private information.</li> <li><b>Appendix E : Resume of Warwick Lyon</b> Warwick’s resume contains personal details and other information that is considered to be private information.</li> <li><b>Appendix F : Biography of Legal Counsel</b> The Biography of Legal Counsel contains information that is considered to be private information.</li> <li><b>Appendix G : Financial Viability Statement</b> The information contained in the financial viability</li> </ul>

		<p>statement includes details of Rimfire Energy's business plans, customer strategies and prospective capital strategies, all of which are commercially sensitive.</p> <ul style="list-style-type: none"> <li>• <b>Appendix H : Management Financial Statements</b> Rimfire Energy is a private company.</li> <li>• <b>Appendix I : Business Plan</b> Rimfire Energy's Business Plan is confidential information.</li> <li>• <b>Appendix J : Corporate Policy Handbook</b> The corporate policy handbook contains confidential internal policy documents.</li> <li>• <b>Appendix K : Enterprise Risk Management Procedures</b> The Enterprise Risk Management Procedures document is confidential information.</li> <li>• <b>Appendix L : Memorandum of Understanding</b> The Memorandum of Understanding document is confidential information.</li> </ul>
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## Appendix A : ASIC Company Extract

 <b>Decide with Confidence</b>	<b>ASIC Company Extract</b>
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### RIMFIRE ENERGY PTY LTD

This computer produced extract contains information derived from the ASIC database either from documents lodged with the ASIC and processed as at the stated date of the extract, or from records supplied by previous state and/or territory systems.

Please advise the ASIC promptly of any error or omission which you may find so that they can correct it.

<b>Company Name</b>	RIMFIRE ENERGY PTY LTD
<b>ACN</b>	160378941
<b>ABN</b>	81160378941
<b>Place Of Registration</b>	N/A
<b>State Of Registration</b>	QLD
<b>Previous State No.</b>	
<b>Date Registered</b>	17 Sep 2012
<b>Extract Date</b>	09 May 2014 12:52:06

### Current Organisation Details

<b>Name</b>	RIMFIRE ENERGY PTY LTD
<b>Details Start Date</b>	17 Sep 2012
<b>Details End Date</b>	N/A
<b>Name Start Date</b>	17 Sep 2012
<b>Company Status</b>	Registered
<b>Company Type</b>	Australian Proprietary Company
<b>Company Class</b>	Limited By Shares
<b>Company Sub Class</b>	Proprietary Company
<b>Date Deregistered</b>	N/A
<b>Reason Deregistered</b>	N/A

### Registered Office

<b>Address:</b>	'PERRIER RYAN BUSINESS ADVISORS' LEVEL 1 30 LISBURN STREET EAST BRISBANE QLD 4169
<b>Start Date:</b>	07 May 2014

### Principal Place Of Business

<b>Address:</b>	LEVEL 5 320 ADELAIDE STREET BRISBANE QLD 4000
<b>Start Date:</b>	27 Sep 2013

### Contact Address for ASIC use only

<b>Address:</b>	PO BOX 1420 COORPAROO DC QLD 4151
<b>Start Date:</b>	06 Mar 2014

### NOTE:



Section 146A of the *Corporations Act 2001* states 'A contact address is the address to which communications and notices are sent from ASIC to the company.'

## Director

### MICHAEL JOSEPH , ALLEN

Address: 12 RIVERBEND PLACE  
BULIMBA  
QLD 4171  
Born: 21 Aug 1967 - BRISBANE, QLD  
Appointed Date: 17 Sep 2012

### WARWICK , LYON

Address: 130 SIMPSONS ROAD  
BARDON  
QLD 4065  
Born: 31 Dec 1970 - PENANG, MALAYSIA  
Appointed Date: 11 Apr 2014

## Share Structure

<b>Class Code</b>	ORD
<b>Class Title</b>	ORDINARY
<b>Document Number Qualifier</b>	
<b>Number of Shares</b>	500,000
<b>Total Amount To Be Paid</b>	\$500,000.00
<b>Total Amount Due</b>	\$0.00

## Shareholders

Class:	ORD	Number Held:	500,000
Beneficially Owned:	Yes	Fully Paid:	Yes
Document Number Qualifier:			
Joint:	No		
157740282 - VENTURE DOWNS PTY LTD			
UNIT 513			
420 QUEEN STREET			
BRISBANE CITY			
QLD 4000			

## Documents Received

### Documents Received (except those listed already under charges)

Documents listing current as at  
**09/05/14**

<b>Date Received:</b>	30 Apr 2014
<b>Description:</b>	484B - Change to Company Details Change of Registered Address
<b>Doc. No.:</b>	2E0478546
<b>Under Requisition:</b>	N
<b>No. Pages:</b>	2
<b>Date Processed:</b>	30 Apr 2014
<b>Effective Date:</b>	02 Apr 2014

<b>Date Received:</b>	15 Apr 2014
<b>Description:</b>	484 - Change to Company Details 484O - Changes to Share Structure

	484G - Notification of Share Issue
	484N - Changes to (Members) Share Holdings
<b>Doc. No.:</b>	2E0440893
<b>Under Requisition:</b>	N
<b>No. Pages:</b>	2
<b>Date Processed:</b>	15 Apr 2014
<b>Effective Date:</b>	11 Apr 2014
<hr/>	
<b>Date Received:</b>	14 Apr 2014
<b>Description:</b>	484E - Change to Company Details Appointment or Cessation of A Company Officeholder
<b>Doc. No.:</b>	2E0433204
<b>Under Requisition:</b>	N
<b>No. Pages:</b>	2
<b>Date Processed:</b>	14 Apr 2014
<b>Effective Date:</b>	11 Apr 2014
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<b>Date Received:</b>	30 Sep 2013
<b>Description:</b>	484C - Change to Company Details Change of Principal Place Of Business (Address)
<b>Doc. No.:</b>	5E3401945
<b>Under Requisition:</b>	N
<b>No. Pages:</b>	2
<b>Date Processed:</b>	30 Sep 2013
<b>Effective Date:</b>	27 Sep 2013
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<b>Date Received:</b>	27 Sep 2013
<b>Description:</b>	484A1 - Change to Company Details Change Officeholder Name Or Address
<b>Doc. No.:</b>	5E3400935
<b>Under Requisition:</b>	N
<b>No. Pages:</b>	2
<b>Date Processed:</b>	27 Sep 2013
<b>Effective Date:</b>	26 Sep 2013
<hr/>	
<b>Date Received:</b>	17 Sep 2012
<b>Description:</b>	201C - Application For Registration as a Proprietary Company
<b>Doc. No.:</b>	5E3117200
<b>Under Requisition:</b>	N
<b>No. Pages:</b>	3
<b>Date Processed:</b>	17 Sep 2012
<b>Effective Date:</b>	17 Sep 2012
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**NOTE:**

Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown, but there is a zero under No pages, the document has been processed, but a copy is not yet available.

CURRENCY: All monetary amounts quoted in this report are shown in AUSTRALIAN DOLLARS unless otherwise stated.

<b>Collection Status</b>	<b>Description</b>
Paid in full	Account paid in full - Closed
Partial Paid	Debt is partially paid
Legal Action	Account is in legal action
Dispute	Debtor is in dispute with creditor

## Appendix B : Certificate of Registration

### Certificate of Registration of a Company

This is to certify that

**RIMFIRE ENERGY PTY LTD**

**Australian Company Number 160 378 941**

is a registered company under the Corporations Act 2001 and  
is taken to be registered in Queensland.

The company **is limited by shares.**

The company is a **proprietary** company.

The day of commencement of registration is  
**the seventeenth day of September 2012.**

Issued by the  
Australian Securities and Investments Commission  
on this seventeenth day of September, 2012.



Greg Medcraft  
Chairman



CERTIFICATE



## **Appendix C : Corporate Structure**

Withheld from this publicly available version of Rimfire Energy's licence application.





## **Appendix D : Resume of Michael Allen**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix E : Resume of Warwick Lyon**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix F : Biography of Legal Counsel**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix G : Financial Viability Statement**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix H : Management Financial Statements**

Withheld from this publicly available version of Rimfire Energy's licence application.





## **Appendix I : Business Plan**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix J : Corporate Policy Handbook**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix K : Enterprise Risk Management Procedures**

Withheld from this publicly available version of Rimfire Energy's licence application.



## **Appendix L : Memorandum of Understanding**

Withheld from this publicly available version of Rimfire Energy's licence application.