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NETEDISON IP HOLDINGS GmbH

Global IP Licensing Business Plan

Licensing EnergyNet™ · Energy Protocol (EP) · EROS™ · Energy Router
Four licensing domains · 30+ country markets · Swiss IP structure

01

Electric Service
Provider Rights

02

Energy Router
Manufacturing

03

Certified Expert
Cadre

04

Brand & Platform
Licensing

NETEDISON IP HOLDINGS GMBH · SWITZERLAND

netedison.com · netedison.ai · May 2026

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01 | Executive Summary

The Licensing Opportunity

NetEdison IP Holdings GmbH is a Swiss limited liability company (GmbH) incorporated to own, protect, and commercialize the intellectual property portfolio of the NetEdison™ platform — a global open standard applying the Internet's architecture to electricity distribution. The Company holds the registered NetEdison™ trademark, the netedison.com and netedison.ai domain names, and acts as first-mover commercializer of the EnergyNet™ architecture, Energy Protocol (EP), and EROS™ (Energy Router Operating System) developed as open standards by Jonas Birgersson and the EnergyNet Task Force, Lund, Sweden. Consistent with the Internet model — where TCP/IP is freely implemented by anyone, yet Cisco, IETF-recognized standards bodies, and certified vendors build the commercial ecosystem — NetEdison's competitive advantage is the registered brand, the operational proof of concept, and the global commercialization infrastructure, not exclusivity to the underlying protocol.

The global electricity retail market reached \$2.81 trillion in 2023 and is growing at 2-7% annually across key markets. Grid modernization investment surpassed \$470 billion in 2025 alone. The distributed energy generation sector reached \$538 billion in 2025, projected to reach \$885 billion by 2033. NetEdison IP Holdings licenses four distinct domains of commercial rights within this market — issuing one exclusive national brand license per country per domain — generating recurring upfront fees, annual royalties, per-unit router fees, and certification revenues.

\$2.81T Trillion — Global Electricity Retail Market	\$470B Billion — Annual Global Grid Investment	30+ Priority Licensing Markets Identified	\$207M Million — Projected Year 7 Revenue
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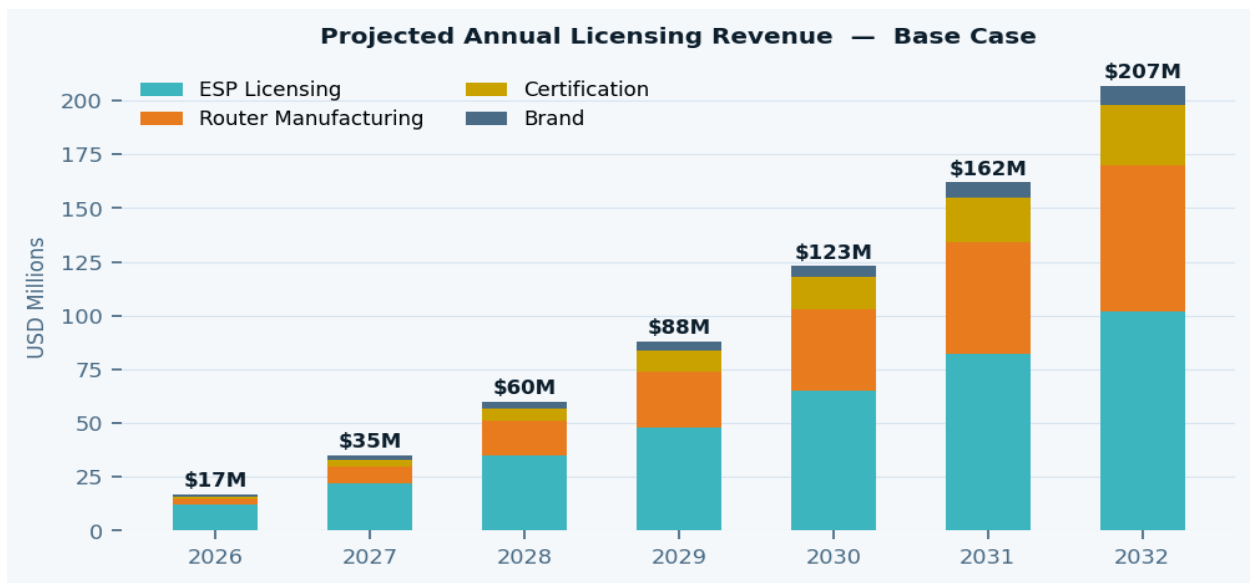
Four Licensing Domains

Domain	Right Licensed	Revenue Type	Est. Year 1 Range
01 — ESP	Operate Electric Service Providers under NetEdison {Country}	Upfront fee + revenue royalty	\$3-25M / country
02 — Manufacturing	Manufacture & distribute Energy Routers locally or for export	Upfront + per-unit royalty	\$1-10M + \$750/unit
03 — Certification	Establish national cadre of NetEdison-certified energy experts	Program fee + per-cert	\$250K-2M + \$1,200/cert

04 — Brand	Use NetEdison brand across EnergyNet, EP, EROS-enabled applications	Annual brand license	\$250K–2M / year
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The Swiss Advantage: NetEdison IP Holdings GmbH is domiciled in Switzerland, qualifying for the Swiss IP Box regime — an effective tax rate of 8.5–12% on qualifying IP licensing income, a 90% tax base reduction on qualified IP earnings, and access to Switzerland's 100+ double tax treaties (most EU royalties: 0% withholding; US royalties: 0–5%).

Revenue Summary — Base Case



Source: NetEdison IP Holdings GmbH internal projections. Base case assumes 30 country licenses by 2030.

02 | The Technology Portfolio

EnergyNet™ — The Architecture

EnergyNet was invented by Jonas Birgersson — founder of Bredbandsbolaget and architect of Sweden's fiber internet build-out — and developed through the EnergyNet Task Force, Lund, Sweden, operating under ViaEuropa Sverige AB. The architecture applies the open, decentralised logic of the Internet's TCP/IP protocol to electricity distribution. Just as the Internet replaced monopoly telecommunications with open, interoperable routing, EnergyNet replaces the brittle, centralized grid with a global ecology of software-defined Energy Routers on a DC backplane.

The core insight is that electricity, like data packets, can be routed. An Energy Router sits at the boundary of any building, campus, or district, managing energy flows between local generation (solar, wind, storage), local load, and the external grid — at a single galvanic separation point. Buildings form ELANs (Energy Local Area Networks). Districts form EWANs. Cities and nations form the global EnergyNet. The open Energy Protocol (EP) ensures interoperability across all manufacturers and jurisdictions.

The IP Portfolio

IP Asset	Description	Status	Revenue Domain
EnergyNet™ Architecture	ELAN EWAN EnergyNet topology; DC backplane; galvanic separation	Open standard (TM registered)	All four domains
Energy Protocol (EP)	Open electrical routing protocol; equivalent of TCP/IP for electricity	Open standard	Domains 01, 02
EROS™	Energy Router Operating System; AI-driven dispatch, load balancing, P2P trading	In development	Domains 01, 02, 04
Energy Router (hardware)	DC backplane device; manages ACDC conversion, routing, metering, communication	Design spec	Domain 02
Freedom Cable	Inter-building DC transmission cable enabling EWAN and P2P energy trading	Concept/spec	Domains 01, 02
NetEdison™ Brand	Registered trademark; netedison.com / netedison.ai domains; global recognition	Registered TM	Domain 04

Proof of Concept — 2001 Union Street, San Francisco

The EnergyNet architecture is not theoretical. Lane Sharman and Open Doors Management independently constructed an operational prototype — an AC Hub — at 2001 Union Street, Cow Hollow, San Francisco. Beginning in 2015 with a Stem battery system to attack PG&E; demand charges, followed

in 2016 by Electro Industries Shark Series revenue-grade submetering of all tenant circuits, and completed in May 2019 with a rooftop solar array — the installation demonstrates six of the eight Energy Router functions described by Jonas Birgersson, without the DC backplane or Freedom Cable. The system has operated continuously since 2016, processing real tenant billing and solar generation data. This is documented at netedison.com/casestudies/2001-union-street/.

"The regulatory barriers, the technology, and the operational model for a building-level ELAN already exist and have been proven. 2001 Union Street is not a proposal — it is an operational installation running since 2016. NetEdison does not need to invent the Energy Router from scratch: it needs to add the Freedom Cable and replicate the architecture across blocks, campuses, and cities using the Lund-proven energy router complete with off-the-shelf power electronics."

Scientific Foundation

The EnergyNet architecture is grounded in peer-reviewed research. The foundational paper — EnergyNet: A Proposed Architecture for a Global Energy Routing System — is available at arxiv.org/pdf/2509.08152. This provides the technical and scientific credibility that investors, regulators, and licensees require before committing to national licensing agreements.

03 | Global Market Opportunity

The Electricity Market — Scale & Transformation

Electricity is the world's most critical infrastructure market. The global electricity retail market reached \$2.81 trillion in 2023 — larger than the global automotive market — and is growing at 2–11% annually depending on the country. Three structural forces are converging to create the largest energy infrastructure transformation in history:

Electrification of Everything

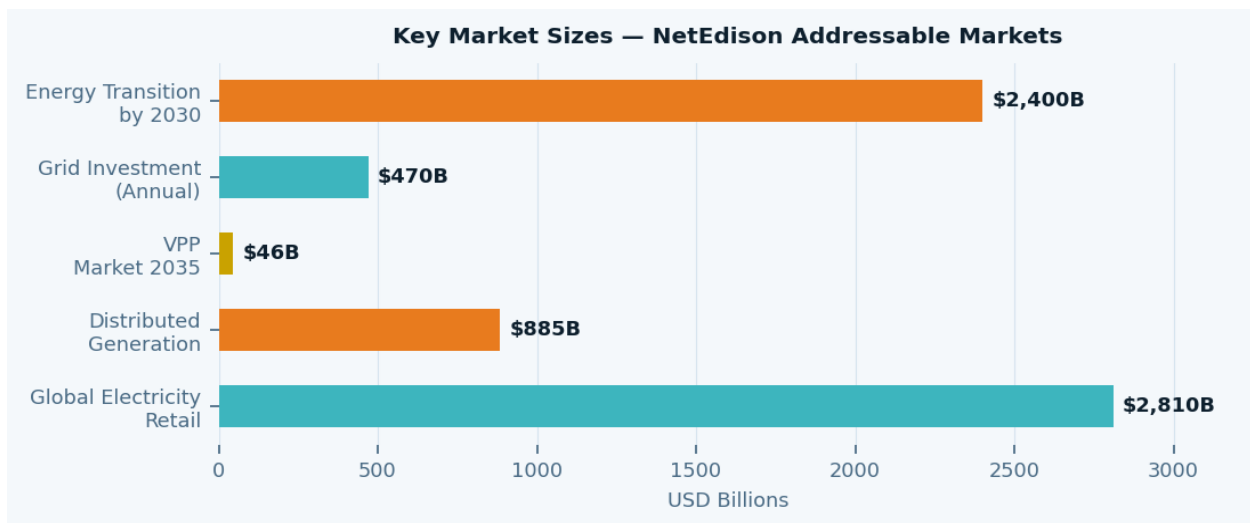
Transport, heating, and industry are shifting from fossil fuels to electricity. The IEA projects global electricity demand will rise by 3,500 TWh over 2025–2027 alone — equivalent to adding the entire German grid every year.

Distributed Generation Explosion

Solar and wind generation are now cheaper than any fossil alternative. The distributed energy generation market reached \$538 billion in 2025 (CAGR 6.4%). In some markets (Spain, Australia, Denmark) renewables already exceed 70–87% of generation.

Grid Failure at Scale

Centralized grids are structurally unable to manage two-way, distributed energy flows. Blackouts, frequency instability, and demand charge abuse signal that a new routing layer is required — precisely what EnergyNet provides.



Sources: GlobeNewswire Global Electricity Retailing Industry Guide 2024; Grand View Research Distributed Energy Generation Market 2025; Precedence Research VPP Market 2025; BloombergNEF Grid Investment 2025; KPMG Energy Transition Investment Outlook 2024.

Regional Demand Highlights

Asia-Pacific

+5.9% / year

Accounts for 75% of global demand growth. China (+7%), India (+5.8%), Indonesia (+11%), Vietnam (+9.8%) are priority expansion markets with aggressive renewable targets and grid modernization agendas.

North America

+2.0% / year

US leads global grid investment at \$115B in 2025. Data centre demand is the primary growth driver. Distributed generation and VPP markets are most mature and best regulated.

Europe

+1.9% / year

Most advanced regulatory frameworks for distributed energy. Renewables reached 48% of EU generation in 2024. Denmark, Netherlands, Spain are ideal pilot markets for inter-building Freedom Cable pilots.

Middle East & Africa

+3.2% / year

Saudi Arabia, UAE, Egypt, Kenya and Nigeria offer high-growth licensing opportunities. Africa's grid access gaps make decentralized EnergyNet architecture particularly compelling.

Latin America

+3.5% / year

Brazil (+6%), Chile, and Mexico offer substantial ESP and manufacturing license opportunities given rapid renewable buildout and energy sector reform.

04 | The Licensing Model

Four-Domain Country Licensing Architecture

NetEdison IP Holdings grants exclusive national brand licenses across four independent but complementary domains. The underlying technologies — EnergyNet, EP, and EROS — are open standards; any operator may implement them. What is licensed exclusively per country is the right to operate under the NetEdison™ brand, to issue NetEdison-certified products, and to run the national NetEdison expert program. This mirrors the Internet model: TCP/IP is open, but the ecosystem of certified vendors and branded services is where commercial value accrues. A licensee may acquire one, several, or all four domains within a country. Each license is structured with an upfront brand exclusivity fee, annual minimum royalties, and activity-based royalties. All licenses are denominated in USD and governed by Swiss law.

DOMAIN 01 — Electric Service Provider (ESP) License

Right granted: The exclusive national right to operate electricity service providers under the brand NetEdison {Country} — buying and selling locally-generated electricity, managing inter-building trades through the Freedom Cable network, and participating in wholesale energy markets as the official NetEdison-branded aggregator. Any operator may freely implement the open Energy Protocol; only the licensee may brand its services NetEdison in this country.

Revenue model: Upfront national brand exclusivity fee (\$3M–\$25M depending on market size) + 2.0–3.5% royalty on gross ESP revenues + annual minimum royalty of \$500K–\$3M.

Market basis: Even 0.1% penetration of a national electricity retail market produces substantial royalty flows. India's \$100B market at 0.1% penetration generates \$100M in licensee revenues and \$2–3.5M in annual royalties to NetEdison IP Holdings per licensee.

Regulatory path: Most jurisdictions permit licensed third-party electricity retailers. The primary legislative barrier is California PUC Section 218 (Over the Fence rule) — a monopoly-era legacy targeted for repeal in the 2026 California gubernatorial campaign.

DOMAIN 02 — Energy Router Manufacturing & Distribution License

Right granted: The exclusive national right to manufacture and distribute Energy Routers under the NetEdison brand and certification mark — physical DC backplane devices implementing the open Energy Protocol — for sale within the country and/or for export. The Energy Protocol is an open standard; any manufacturer may build compliant devices. The license grants the right to market them as NetEdison-certified, and includes access to reference hardware specifications, EP compliance test standards, and EROS firmware.

Revenue model: Upfront manufacturing license (\$1M–\$10M) + per-unit royalty of \$500–\$1,500 per Energy Router shipped + 1.5% royalty on Freedom Cable installations.

Market size: Global grid investment is \$470B/year and growing. Energy Routers address the distributed segment. At 100,000 units shipped globally by Year 5 at \$750/unit royalty, this domain alone generates \$75M in annual royalty to NetEdison IP Holdings.

Manufacturing hubs: Tier 1 manufacturing targets: South Korea (electronics supply chain), Germany (industrial precision), India (scale + government incentives under PLI scheme), USA (domestic content requirements).

DOMAIN 03 — Certified Expert Cadre License

Right granted: The right to establish within the country a national program certifying energy professionals as NetEdison Certified Energy Experts (NCEE) — trained in bi-directional electricity, Energy Protocol, EROS operations, demand management, and EnergyNet deployment at industrial, retail, consumer, and government levels.

Revenue model: Program establishment fee (\$250K–\$1M) + per-certification fee (\$800–\$1,500) + annual program renewal (\$100K–\$500K) + 10% of course materials revenue.

Market demand: The energy transition requires an estimated 14 million new energy workers globally by 2030 (IEA). Certification programs providing recognized credentials in EnergyNet technologies address a critical market gap.

Strategic value: The certification cadre creates the installation, maintenance, and consulting ecosystem that drives Energy Router deployment — multiplying demand across all four licensing domains.

DOMAIN 04 — Brand & Platform License

Right granted: Use of the NetEdison™ registered trademark and brand identity across EnergyNet-enabled products, services, applications, and platforms — including consumer energy apps, P2P energy trading platforms, demand response services, carbon credit platforms, and government advisory services.

Revenue model: Annual brand license fee (\$250K–\$2M per year) + 1.0–2.0% royalty on branded platform revenues.

Expansion potential: EnergyNet, EP, and EROS enable a wide ecosystem: P2P energy trading platforms, real-time carbon accounting, AI demand optimization services, and municipal energy management systems. Each carries NetEdison brand equity.

Brand value: NetEdison™ is a registered trademark with global recognition through the open letter campaign, the Mumbai market study, and the peer-reviewed EnergyNet paper. The brand anchors all commercial activity in the EnergyNet ecosystem.

05 | Country-by-Country Market Analysis

Priority Markets Overview

NetEdison IP Holdings has identified 30 priority licensing markets across five regions. Countries are tiered by electricity market maturity, regulatory environment, renewable transition velocity, and strategic importance to the EnergyNet global rollout. The following table presents key data drawn from IEA Electricity 2025 and BloombergNEF.

Country	Region	Elec (TWh)	Demand Growth	Grid Inv (\$B)	Tier	ESP License Fee Range	Router Market	Priority
United States	N. America	4,200	+2.0%	\$115	1	\$15-25M	Very High	HIGH
China	Asia-Pacific	9,800	+7.0%	\$90	1	\$20-30M	Very High	HIGH
India	Asia-Pacific	2,050	+5.8%	\$22	1	\$8-15M	Very High	HIGH
Germany	Europe	600	+1.2%	\$28	1	\$5-10M	High	HIGH
United Kingdom	Europe	335	+2.4%	\$18	1	\$4-8M	High	HIGH
Japan	Asia-Pacific	1,060	+0.4%	\$12	2	\$4-7M	High	MED
South Korea	Asia-Pacific	620	+1.2%	\$8	2	\$3-5M	High	MED
Australia	Asia-Pacific	270	+3.2%	\$9	2	\$2-4M	High	MED
France	Europe	475	+1.0%	\$14	2	\$3-6M	High	MED
Brazil	Latin America	700	+6.0%	\$7	2	\$3-5M	Medium	MED
Spain	Europe	290	+1.9%	\$6	2	\$2-4M	Medium	MED
Netherlands	Europe	125	+2.5%	\$5	2	\$2-3M	High	MED
Saudi Arabia	Middle East	385	+3.5%	\$12	2	\$3-6M	Medium	MED
UAE	Middle East	164	+3.0%	\$5	2	\$2-4M	Medium	MED
Indonesia	Asia-Pacific	380	+11.0%	\$3	2	\$2-4M	High	HIGH
Vietnam	Asia-Pacific	280	+9.8%	\$2	3	\$1-2M	Medium	MED
Thailand	Asia-Pacific	210	+4.0%	\$2	3	\$1-2M	Medium	MED
Philippines	Asia-Pacific	125	+5.0%	\$1	3	\$0.8-1.5M	Medium	MED
Singapore	Asia-Pacific	55	+4.5%	\$2	2	\$1.5-3M	High	MED
Mexico	Latin America	380	+2.7%	\$3	3	\$1-2M	Medium	MED

Chile	Latin America	90	+2.5%	\$2	3	\$0.8–1.5M	Medium	LOW
Denmark	Europe	35	+5.0%	\$2	2	\$1–2M	High	MED
Poland	Europe	175	+0.7%	\$4	3	\$1–2M	Medium	LOW
Turkey	Europe	370	+5.7%	\$3	3	\$1.5–3M	Medium	MED
South Africa	Africa	240	+4.1%	\$2	3	\$0.8–1.5M	Medium	MED
Kenya	Africa	12	+6.5%	\$0.3	3	\$0.3–0.8M	Low	MED
Nigeria	Africa	32	+5.0%	\$0.5	3	\$0.5–1M	Low	LOW
Egypt	Africa	210	+1.6%	\$1	3	\$0.8–1.5M	Low	LOW
Morocco	Africa	45	+3.0%	\$0.4	3	\$0.5–1M	Low	LOW
Canada	N. America	650	+0.7%	\$12	2	\$3–5M	High	MED

Sources: IEA Electricity 2025 (iea.blob.core.windows.net); BloombergNEF Global Grid Investment 2025; GlobeNewswire Global Electricity Retailing Industry Guide 2024. Demand growth figures are IEA 2024 actuals. License fee ranges are internal estimates based on electricity market size, regulatory maturity, and comparable technology licensing benchmarks.

Priority Market Deep-Dives

India — Highest Priority Market

India's electricity demand grew 5.8% in 2024 and is forecast to average +6.3% annually through 2027. Peak load rose from 148 GW in 2014 to 250 GW in 2024. The government's PM-Surya Ghar scheme carries a financial outlay of over INR 700 billion in solar rooftop subsidies. India added 55.3 GW of non-fossil capacity in FY 2025–26, ranking third globally in renewable capacity. Mumbai's SEEPZ, JNPA, and Lodha Palava SEZ campuses represent ideal ELAN pilot deployment sites, as detailed in the NetEdison Mumbai EnergyNet Market Study (netedison.com/india/). An ESP + Manufacturing bundle license for India is estimated at \$15–25M upfront with 2.5% royalty.

United States — Largest Grid Investment

The US deployed \$115 billion in grid investment in 2025 — a quarter of global total. Electricity demand grew 2% in 2024, with data centres as the fastest-growing segment (176 TWh in 2023, rising to 325–580 TWh by 2028). California's gubernatorial election in November 2026 presents a direct policy opportunity: repeal of PUC Section 218 (Over the Fence rule) would immediately unlock inter-building Freedom Cable deployment across the state's 40 million residents. The US license — all four domains — is the single most valuable license in the portfolio, estimated at \$20–30M upfront.

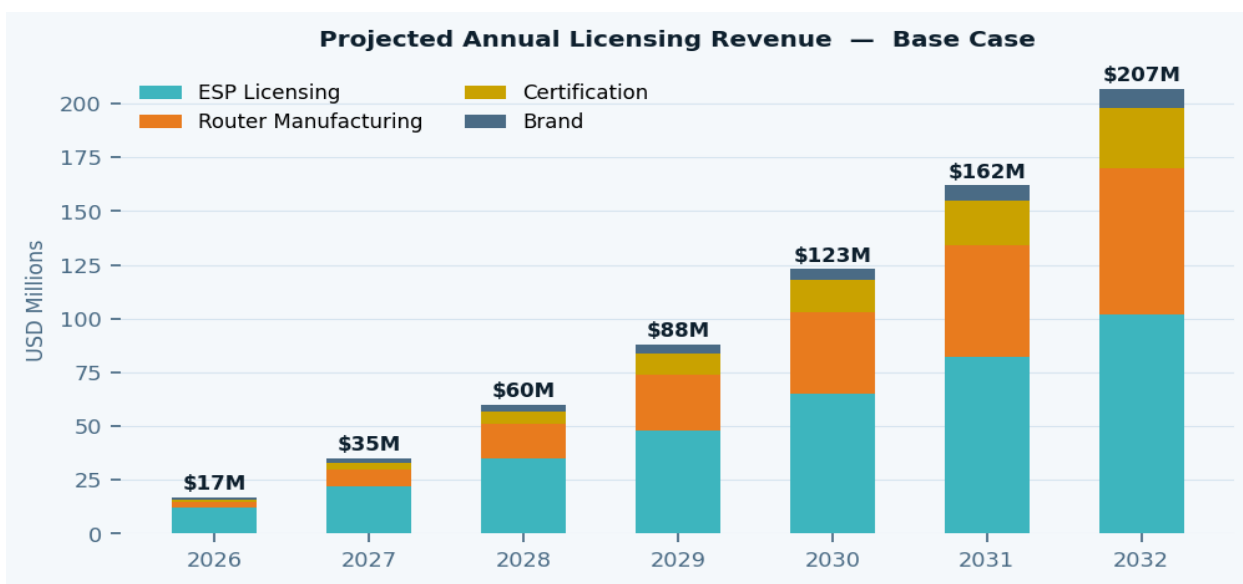
Southeast Asia — Fastest Growth

Southeast Asia recorded +7.4% electricity demand growth in 2024 — the fastest of any region. Indonesia grew 11%, Vietnam nearly 10%. Together these two countries provided two-thirds of all regional demand growth. Regulatory frameworks are evolving rapidly: Thailand's draft PDP 2024 targets 51% renewables by 2037; the Philippines launched green energy auctions including storage integration. Singapore's grid import capacity is being doubled. The region represents five separate country licenses (Indonesia, Vietnam, Thailand, Philippines, Singapore) with combined upfront fees estimated at \$8-15M and growing royalty streams as the energy transition accelerates.

06 Revenue Projections

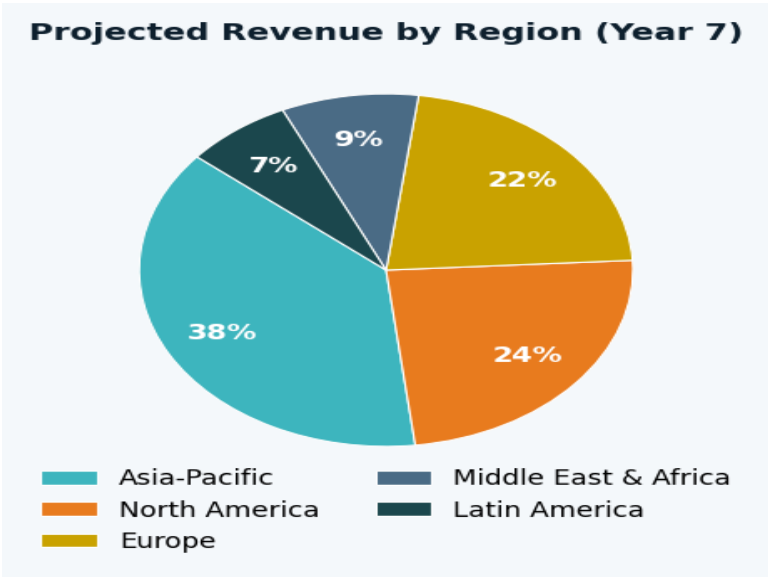
Seven-Year Base Case Model

The following projections assume a phased licensing rollout: five Tier 1 country licenses in Year 1, expanding to 20 countries by Year 3 and 30+ by Year 5. Revenue is drawn from all four domains with an increasing proportion shifting from upfront fees to recurring royalties as deployed licensees begin generating revenues. These are base-case estimates; a conservative case applies 60% of these figures and a high case applies 175%.



Revenue Stream	Year 1 2026	Year 2 2027	Year 3 2028	Year 4 2029	Year 5 2030	Year 6 2031	Year 7 2032
ESP Licensing	\$12M	\$22M	\$35M	\$48M	\$65M	\$82M	\$102M
Router Manufacturing	\$3M	\$8M	\$16M	\$26M	\$38M	\$52M	\$68M
Certification	\$1M	\$3M	\$6M	\$10M	\$15M	\$21M	\$28M
Brand Licensing	\$1M	\$2M	\$3M	\$4M	\$5M	\$7M	\$9M
TOTAL	\$17M	\$35M	\$60M	\$88M	\$123M	\$162M	\$207M

Countries licensed grows from 5 (Year 1) to 30 (Year 5). ESP royalties represent 49% of Year 7 revenue. Manufacturing royalties grow as Energy Router units ship from licensed factories in Year 2 onward. Certification and brand revenues are high-margin, low-capex streams that grow with the installed base.



Projected revenue distribution by region in Year 7 (2032). Asia-Pacific leads driven by India, Indonesia, and Japan.

07 | The Swiss IP Structure

Why Switzerland — Strategic and Tax Advantages

NetEdison IP Holdings GmbH is incorporated in Switzerland — one of the world's premier jurisdictions for intellectual property holding companies. Switzerland combines legal stability, OECD-compliant tax efficiency, a global treaty network, and a reputation for neutrality that is essential for a company licensing to governments and regulated utilities across 30+ countries.

Advantage	Detail
IP Box Tax Rate	8.5–12% effective tax rate on qualifying IP licensing income. 90% reduction of the tax base for royalties, milestone payments, and licensing fees from qualifying intellectual property.
Double Tax Treaties	Switzerland maintains 100+ bilateral double tax treaties. EU royalties face 0% withholding in most cases. US royalties: 0–5% (vs. 30% default). This materially increases net licensing income compared to US or UK IP holding structures.
OECD BEPS Compliance	The Swiss IP Box is fully compliant with OECD Base Erosion and Profit Shifting standards, providing legal certainty for multi-jurisdictional licensing agreements and reducing regulatory risk for licensees.
Advance Tax Rulings	Swiss cantonal tax authorities provide binding advance rulings on IP structures, enabling precise tax planning before licensing agreements are executed.
Legal Framework	Swiss GmbH provides limited liability, flexible governance, and internationally recognized legal standing. Swiss contract law is stable, predictable, and preferred by institutional investors and multinational licensees.
M&A; Premium	Tax-efficient IP structures in Switzerland command acquisition premiums of 15–25% over comparable structures in higher-tax jurisdictions, directly enhancing exit valuation for investors.

Net Tax Advantage Example: A \$5M annual royalty payment from a German licensee to NetEdison IP Holdings GmbH faces 0% German withholding tax under the EU-Switzerland DTT. Applied to the Swiss IP Box, the effective Swiss tax is approximately 10%. Net retained royalty: \$4.5M. The same payment routed through a US LLC would incur 30% withholding at source, reducing net receipts to \$3.5M — a \$1M annual difference on a single country license.

08 | Credibility & Resources

Why NetEdison IP Holdings Can Execute

NetEdison IP Holdings enters the market with a substantial body of technical, legal, and operational evidence that positions it above all comparable IP licensing vehicles in the distributed energy sector. The following resources are available for investor and licensee due diligence.

<p>Scientific Paper arxiv.org/pdf/2509.08152</p>	<p>The foundational EnergyNet architecture paper by Jonas Birgersson and the EnergyNet Task Force. Peer-reviewed and publicly available. Establishes the technical and scientific foundation for the EnergyNet commercialization thesis.</p>
<p>Operational Case Study netedison.com/casestudies/2001-union-street/</p>	<p>Full documentation of the 2001 Union Street AC Hub — an operating installation since 2016 demonstrating six of eight Energy Router functions with real billing data, solar generation, and Stem battery demand management. Photographs, equipment specifications, and chronology included.</p>
<p>Mumbai Market Research netedison.com/india/</p>	<p>33-page market study on EnergyNet deployment viability across Mumbai's SEEPZ, JNPA, and Palava City campuses. Covers regulatory framework, licensee market, three-phase deployment strategy, and financial modeling for India. Available as viewable PDF and interactive landing page.</p>
<p>Open Letter to Tom Steyer netedison.com/petition/</p>	<p>Public petition to California's incoming Governor-elect (November 2026) requesting repeal of PUC Section 218 (Over the Fence rule). Demonstrates active policy engagement and the regulatory strategy for the US market.</p>
<p>Global Registry netedison.com/registry/</p>	<p>Live registration platform for four stakeholder types — Coders, Engineers, Users, and Investors — with engagement letters tailored to each persona. Demonstrates operational readiness and stakeholder development pipeline.</p>
<p>Brand Assets netedison.com netedison.ai</p>	<p>Two premium domain names. Registered NetEdison™ trademark held by NetEdison IP Holdings GmbH. Professional brand identity designed for international market deployment.</p>

The Team

Jonas Birgersson — Technical founder of EnergyNet. Built Sweden's first fiber broadband network (Bredbandsbolaget, 1998) and applied the same architectural logic to electricity with the EnergyNet Task Force in Lund, Sweden, through ViaEuropa Sverige AB. The parallel with TCP/IP is not metaphor — it is the literal design principle.

Lane Sharman / Open Doors Management — US-based energy project developer and the operator of the 2001 Union Street AC Hub. Lane independently arrived at the EnergyNet architecture before making contact with Birgersson — demonstrating that the architecture is convergent and inevitable. Lane brings 10+ years of energy project development, CCA regulatory expertise, BESS economics, and legal agreement drafting to the commercialization effort.

09 | Investment Proposition

Why Invest in NetEdison IP Holdings GmbH

<p>\$207M</p> <p>Million projected Year 7 revenue</p>	<p>8.5%–12%</p> <p>Effective Swiss IP Box tax rate</p>	<p>30+</p> <p>Country licenses to be issued</p>	<p>0%</p> <p>EU withholding on royalties</p>
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Pure IP model — no capex. NetEdison IP Holdings does not build, operate, or maintain any physical infrastructure. All capital expenditure falls on licensees. The holding company generates high-margin royalty and licensing fee income with minimal operating cost.

Four independent revenue streams. Each licensing domain is independently saleable. A single country acquiring all four domains generates 4× the revenue of a single-domain license. The domains are also complementary — an ESP licensee in a country creates demand for certified experts (Domain 03) and branded platform applications (Domain 04).

Recurring revenue grows with the energy transition. As solar, wind, and storage penetration grows — which IEA projects will happen in every market — the ESP licensees' revenues grow, and royalties to NetEdison IP Holdings grow proportionally. The business is structurally long the global energy transition.

Swiss IP Box delivers institutional-grade tax efficiency. The 8.5–12% effective rate and 0% EU withholding are not temporary advantages — they are OECD-compliant structural features of the Swiss system. M&A; exit valuations for Swiss IP holding structures command a 15–25% premium.

First-mover advantage in a structurally new market. No comparable open-standard IP licensor exists for the distributed electricity routing market. NetEdison IP Holdings is positioning to become the IETF of the energy internet — the standards body and IP licensor for a market that does not yet exist at scale but is structurally inevitable.

Defensible IP with operational proof. The registered trademark, peer-reviewed scientific paper, and operational case study at 2001 Union Street provide a three-layer defense against challenge: legal (trademark), scientific (arxiv paper), and operational (nine-year running installation).

Risk Factors

Regulatory Risk: Country-specific electricity regulations may slow or prevent ESP license deployment. **Mitigation:** the four-domain model allows manufacturing and certification licenses to proceed independently of ESP licensing.

Technology Risk: Energy Router hardware and EROS software remain in development. **Mitigation:** 2001 Union Street demonstrates that the architecture works with existing off-the-shelf components; the DC backplane is an engineering problem, not a physics problem.

Section 218 / Over the Fence: California's inter-building prohibition prevents Freedom Cable deployment in the US until repealed. **Mitigation:** active petition campaign; the November 2026 gubernatorial election is a specific policy catalyst.

Competitive Risk: Established players (Siemens, ABB, Schneider) may develop competing routing architectures. **Mitigation:** NetEdison's open protocol strategy mirrors the Internet's success — open protocols win; proprietary protocols lose.

Licensee Execution Risk: Licensee failure to deploy may slow royalty growth. **Mitigation:** upfront fees are non-refundable; minimum annual royalties provide floor revenue regardless of licensee activity.

Sources & References

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- ⁷ KPMG Energy Transition Investment Outlook 2024 — kpmg.com/content/dam/kpmgsites/ge/pdf/2024/Energy-transition-investment-outlook.pdf
- ⁸ SIGTAX AG — Swiss IP Box Analysis 2025 — sigtax.com/How-Global-Firms-Use-Swiss-IP-Box-to-Slash-Tax-Rates
- ⁹ EnergyNet Architecture Paper — Jonas Birgersson et al. — arxiv.org/pdf/2509.08152
- ¹⁰ NetEdison Case Studies — netedison.com/casestudies/
- ¹¹ NetEdison India Market Study — netedison.com/india/
- ¹² NetEdison Open Letter (Section 218) — netedison.com/petition/

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