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17 November 2017

Mr Owen Pascoe
Director
Australian Energy Market Commission
Level 6, 201 Elizabeth Street
Sydney NSW 2000

By email: submissions@aemc.gov.au

Dear Mr Pascoe,

Strengthening protections for customers requiring life support equipment – RRC0009

Ausgrid welcomes the opportunity to provide a response to the AEMC's proposed Rule Change – National Electricity Amendment (Strengthening protections for customers requiring life support equipment) Rule 2017 and appreciated the opportunity to discuss this directly with you during the consultation process. We also appreciate the opportunity to share the high level results from our Life Support Customer Survey. We strongly support the need for clear and effective arrangements in relation to managing supply for customers with life support equipment and recognise that existing rules lack clarity in this regard. We also recognise the importance of maintaining an accurate register of life support customers and equipment, and consider that distributors are best placed to manage and maintain this information.

The key issues

Ausgrid agrees with the AER and most other stakeholders, that existing rules governing registration and electricity supply for customers requiring life support equipment are unclear and do not provide a sufficient framework for protecting these customers or determining specific responsibilities between participants. In particular:

- It is not clear under current rules which parties have responsibility for the definitive registration of customers on life support, or how this register is maintained over time;
- Retailers and distributors remain uncertain regarding when the responsibilities for life support protection measures commence and cease under current rules;

- There is no specificity in relation to required information provided to customers to ensure they are adequately informed on their rights and requirements, or the information exchanged between distributors and retailers when aligning registration details, particularly in relation to the provision of medical confirmation and a customer's eligibility to be on a/the life support register; and
- Numbers of registered customers on life support register(s) is growing substantially and it is becoming increasingly difficult to reconcile retailer and distributor registers under current arrangements. The need for a simplified approach and register is apparent.

Our comments on the more preferable Draft Rule and suggestions moving forward

The proposed Rule Changes provide some improvements in clarifying the commencement of obligations on distributors and retailers. Under the proposed Rules the obligations would commence from the time the customer informs the retailer or distributor (whichever is first contacted by the customer) and continues until they are deregistered. Whilst we accept that this timing is relatively clear and provides the necessary protections required by these customers, we also recognise that the processes to support this practice may require market systems (B2B transactions) to be established in order for other appropriate market participants to have access to this information. It is important for the AEMC to consult with the IEC and AEMO to ensure this Rule Change can be accommodated across the NEM.

Ausgrid remains concerned that the proposed Rule Change preserves the multi-party registration approach. The proposed arrangements require the party first contacted by the customer to take responsibility for registering that customer and for the ongoing maintenance of that registration. Allowing the initial contact to determine the registering party can lead to a number of unnecessary issues, such as:

- uncertainty over which party is responsible (has another party already been contacted);
- greater potential for registers held by parties to differ over time;
- variations in data details and format;
- differences in notification systems applied for customers, including deregistration;
- invites multiple parties to contact the customer to confirm registration or deregistration information.

Ausgrid considers that the responsibility for registering customers on the life support system should be clearly assigned to one party. Ausgrid proposes that the distributors be made responsible for this process, thereby ensuring consistency, clear accountability and independence from retail churn. We consider this would be more aligned with the customer's distributor supply contract and allows a single point of authority when identifying registered customers, particularly in relation to supply outages which are normally managed by the distributors. It is critical to maintain accurate and sufficiently detailed contact information in cases of supply emergencies or outages for life support and critical supply dependent customers. Ausgrid asserts that this information can be more assured under a specific assignment of responsibility to distributors.

Moreover, as indicated in the more preferable Draft Rule, there is a need to provide information to assist these customers to prepare a plan of action in the case of an interruption. Ausgrid submits that distributors may be best placed to provide this information due to their familiarity with the distribution networks and network planning.

Ausgrid appreciates that imposing single responsibility for registration of life support customers onto distributors also includes obligations for the dissemination of information to these customers regarding rights and obligations as well as processes for medical confirmation and deregistration. Whilst recovery of these reasonable costs will be required under the Regulated Revenue reset process, this would be a more efficient approach than requiring both distributors and retailers to duplicate processes for customer registration and information distribution.

Ausgrid notes that B2B and other system and process changes may be required to implement this proposed Rule Change. Such changes in the current climate, in conjunction with new Power of Choice regulations will require a reasonable transition period before full introduction. Ausgrid proposes further consultation with AEMO and the IEC to determine optimal timing for implementation and to ensure customers requiring life support equipment continue to receive the quality of electricity services they need.

Ausgrid has observed inconsistent provision of data in the market systems for Mandatory customer data fields and additionally notes the need for further mandatory fields. We have recently undertaken research to improve our understanding about the communication needs and preferences of our life support customers during an interruption to power supply. These research insights indicate that 95% of life support customers wish to be contacted after a loss of power. They nominate their most acceptable method of communication during unplanned and planned outages to be SMS notification across all time periods day/night. We are only able to provide this service to customers if we have the required mobile telephone details in the right format. Ausgrid hence proposes the following amendments and clarifications to the customer details fields.

Fields	Comments
Customer Name	Full Customer Name
Customer Site Address	Complete street address
Customer Postal Address	If different to supply address
NMI	
Telephone	Landline
Telephone	Mobile number, If no mobile number Not Applicable stated.
Email address	
Type of life support equipment	
Secondary Customer Contact Name	Carers Name or Secondary Contact
Secondary Customer Contact Telephone	Landline
Secondary Customer Contact Telephone	Mobile number, If no mobile number Not Applicable stated.

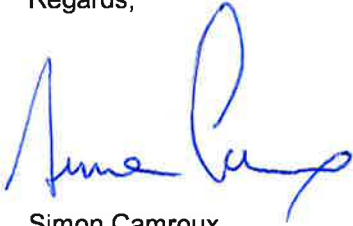
Current Mandatory Field
Current Required Field – Proposed Mandatory
New Requirement

Ausgrid supports the need for amendments to the rules relating to protections for customers requiring life support equipment in order to ensure they maintain the level of electricity supply assurance and protections they need. We acknowledge the AER's concerns that the current registers of life support customers may have become disparate between retailers and distributors in a significant number of cases.

Clear assignment of responsibility to distributors is one measure proposed by Ausgrid to address this issue. Ausgrid also supports the clarification of responsibility for life support arrangements as commencing from the time of notification from the customer - to the extent that this obligation can be accommodated in B2B procedures and market systems.

We would be pleased to discuss our submission with the AEMC in more detail. Please contact John Thomson on 02 9269 2312 in this regard.

Regards,

A handwritten signature in blue ink, appearing to read 'Simon Camroux', with a large, stylized flourish at the end.

Simon Camroux
Head of Regulation