



Australian Energy Market Commission

CONSULTATION PAPER

**National Energy Retail Amendment
(Strengthening protections for customers
requiring life support equipment) Rule 2017**

Rule Proponent
AER

20 June 2017

**RULE
CHANGE**

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About the AEMC

The AEMC reports to the Council of Australian Governments (COAG) through the COAG Energy Council. We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the COAG Energy Council.

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1 Introduction

On 28 February 2017, the Australian Energy Regulator (AER) submitted a rule change request to the Australian Energy Market Commission (AEMC or Commission) which seeks to strengthen the protections provided to customers requiring life support equipment. The AER proposes changes to the National Energy Retail Rules (NERR) to modify the obligations of retailers and distributors when a person residing at a customer's premises requires life support equipment. The rule change request can be found on the Commission's website.¹

We have prepared this consultation paper to seek stakeholder views on the AER's rule change request. As such, this paper:

- provides background on the life support rules and an overview of the rule change request
- outlines the criteria we suggest is relevant for assessing the rule change request
- identifies questions and issues on which we would especially like to receive your views
- explains how you can lodge a submission.

¹ See www.aemc.gov.au/Rule-Changes/Strengthening-protections-for-customers-requiring

2 The life support rules

In its rule change request, the AER notes the life support rules are changing on 1 December 2017 as part of the *Expanding competition in metering and related services* rule change. The rule change request proposes amendments to the post 1 December 2017 version of the NERR, having regard to the timings involved in effecting a rule change.²

Accordingly, it is this post 1 December 2017 set of rules, not the current rules, that we describe below for the purposes of consultation. A copy of the set of rules that come into force on 1 December 2017 can be found on the AEMC's website.³

Part 7 of the NERR (life support rules) sets out the obligations on retailers and distributors when a person residing at a customer's premises requires life support equipment. Life support equipment is defined in Part 1 of the NERR and means any of the following:

- An oxygen concentrator
- An intermittent peritoneal dialysis machine
- A kidney dialysis machine
- A chronic positive airways pressure respirator
- Crigler najjar syndrome phototherapy equipment
- A ventilator for life support
- In relation to a particular customer – any other equipment that a registered medical practitioner certifies is required for a person residing at the customer's premises for life support.

The life support rules state that a retailer must not arrange for the de-energisation of premises at which life support equipment is required, except in the case of a retailer planned interruption under rule 59C. Similarly, the life support rules state that a distributor must not de-energise premises at which life support equipment is required, except in the case of an interruption under Division 6 of Part 4.

Under these rules, a distributor or retailer wanting to interrupt the electricity supply to premises at which life support equipment is required must give the customer at least four business days written notice of the planned interruption to supply at the premises (the four business days to be counted from, but not including, the date of receipt of the

² Rule change request p.4.

³ <http://www.aemc.gov.au/Rule-Changes/Expanding-competition-in-metering-and-related-serv>

notice).⁴ This means that premises at which life support equipment is required cannot be disconnected for non-payment, for instance.

The life support rules will apply to retailers where:

1. a customer provides a retailer with confirmation from a registered medical practitioner that a person residing at the customer's premises requires life support equipment; or
2. the retailer is advised by a distributor that a person residing at the customer's premises requires life support equipment.⁵

Similarly, the life support rules will apply to distributors where:

1. a customer provides a distributor with confirmation from a registered medical practitioner that a person residing at the customer's premises requires life support equipment; or
2. the distributor is advised by a retailer that a person residing at the customer's premises requires life support equipment.⁶

The life support rules require retailers and distributors to register premises as having life support equipment.⁷ At the time it registers the customer's premises as having life support equipment, a retailer must give the customer:

- an emergency telephone contact number for the distributor (the charge for which must be no more than the cost of a local call)
- general advice that there may be a retailer planned interruption to supply at the address.⁸

The obligations for distributors at the time of registering are similar, with one addition. A distributor must give the customer:

- an emergency telephone contact number for the distributor (the charge for which must be no more than the cost of a local call)
- general advice that there may be a distributor planned interruption or unplanned interruption to supply at the address
- information to assist the customer to prepare a plan of action in case of an unplanned interruption.⁹

⁴ Rule 124(1)(f) of the post 1 December 2017 NERR applies to retailers and rule 125(2)(f) of the post 1 December 2017 NERR applies to distributors

⁵ Rule 124(1A) of the post 1 December 2017 NERR

⁶ Rule 125(1)

⁷ Rule 124(1)(a) of the post 1 December 2017 NERR applies to retailers. Rule 125(2)(a) of the post 1 December 2017 NERR applies to distributors.

⁸ Rule 124(1)(e)

Both retailers and distributors are required to share relevant information about premises on their life support registers¹⁰ and to keep their registers up to date.¹¹ A retailer must inform the distributor if a customer advises the retailer that the person for whom the life support equipment is required has vacated the premises or no longer needs the life support equipment.¹²

Both a retailer and a distributor may request a customer whose premises have been registered under rule 124 or 125 of the post 1 December 2017 NERR to inform them if the person for whom the life support equipment is required has vacated the premises or no longer requires the life support equipment.¹³

⁹ Rule 125(2e) of the post 1 December 2017 NERR

¹⁰ Rule 124(1)(c) of the post 1 December 2017 NERR applies to retailers and rule 125(2)(c) of the post 1 December 2017 NERR applies to distributors

¹¹ Rule 124A of the post 1 December 2017 NERR applies to retailers and rule 126 of the post 1 December 2017 NERR applies to distributors

¹² Rule 124(2) of the post 1 December 2017 NERR

¹³ Rule 124A(2) of the post 1 December 2017 NERR applies to retailers and rule 126(2) of the post 1 December 2017 NERR applies to distributors

3 Overview of the rule change request

In this section we have summarised:

- the concerns the AER has identified with the life support rules
- the rule changes the AER has proposed to address its concerns.

3.1 The AER's concerns with the life support rules

In its rule change request, the AER highlighted three main concerns with the life support rules¹⁴:

1. Customers requiring life support equipment are not being validly registered:
 - (a) customers must provide confirmation from a registered medical practitioner in order to receive the life support protections¹⁵
 - (b) customers may be unaware of the need to provide medical confirmation as distributors and retailers are not required to provide customers:
 - (i) information that the customer needs to provide confirmation from a registered medical practitioner to be validly registered
 - (ii) information that the customer must be validly registered to receive critical protections under the law
 - (iii) details about the registration process
2. The AER has difficulty enforcing certain life support rules if the customer does not provide medical confirmation to either the retailer or distributor.
3. Life support registers have grown and have become increasingly inaccurate.

The AER's work with retailers and distributors to ensure compliance with the life support rules has raised a concern that many customers on the life support registers of retailers and distributors are not receiving the legal protection the life support rules are supposed to provide. Customers advise retailers and distributors their premises require life support equipment and the retailer or distributor registers them. However, the AER reports cases where it cannot enforce the protections because the customer has

¹⁴ See rule change request pp.7-8 and pp.12-22

¹⁵ This would not however apply where either rule 124(1A)(a) or rule 125(1)(a) of the post 1 December 2017 NERR apply. Where a distributor advises a retailer that a person residing at the customer's premises requires life support equipment, prior medical confirmation is not required for the life support rules to be applicable to the retailer. i.e. the life support rules will apply to the retailer in this case immediately upon receiving the advice from the distributor, whether or not the distributor has received medical confirmation from the customer. Similarly, where a retailer advises a distributor that a person requires life support equipment, prior medical confirmation is not required for the life support rules to be applicable to the distributor.

not provided confirmation from a registered medical practitioner, including where the customer was not informed they were required to do so.

The AER is concerned that some retailers and distributors, when they are advised by customers of the need for life support at their premises, are not providing those customers with adequate information about what protections their registration entitles them to and what they are required to do to confirm their eligibility for those protections. This contributes further to the number of customers on life support registers who have not provided confirmation from a medical practitioner, unaware their omission might mean there are no repercussions if a retailer or distributor disconnects them.

The AER surveyed retailers and distributors and was concerned that some retailers and distributors do not have a complete process for receiving medical confirmation of the need for life support equipment. This lack of a process to advise and follow up contributes to more customers being on a life support register without having provided medical confirmation.

Finally, the AER has expressed concern at the growth in the numbers of customers on life support registers due to low levels of follow up for medical confirmation and increasing numbers of inaccurate and out-of-date registrations.

Question 1 The concerns the AER has identified with the life support rules

(a) Has the AER accurately characterised the problems with the life support rules?

3.2 The rule changes the AER has proposed to address its concerns

The AER has set out proposed changes to the life support rules in its rule change request and included a proposed rule.¹⁶

The proposed changes aim to:

- enable a customer to receive the protections of the life support rules from the time they inform their retailer or distributor until they are deregistered, either because they:
 - do not provide medical confirmation within a prescribed time
 - inform the retailer or distributor that life support equipment is no longer required.¹⁷

¹⁶ Rule change request, Attachment 3.

¹⁷ Proposed rule 125.

- require the registration process owner (the retailer or distributor first contacted by the customer) to:
 - notify customers of their rights and obligations under the life support rules
 - follow a prescribed process for obtaining confirmation of a customer’s eligibility to be on the life support register
 - follow a prescribed process if the registration process owner chooses to remove a customer from the register.

In its rule change request, the AER has decided not to propose changes:

- to the retailer or distributor obligations in respect of de-energisation, planned interruptions, and unplanned interruptions
- that would operate retrospectively to customers already on life support registers
- to create a single register for all parties as this option was considered in the Commission's *Expanding competition in metering and related services* rule change
- to the definition of life support equipment.¹⁸

3.2.1 Changes to the registration process

The AER acknowledges that retailers and distributors are already placing customers on their life support registers when customers advise them of the need for life support equipment at their premises. The AER aims to ensure the benefits of the life support rules are made available, and can be legally enforced, even if a customer has not yet provided the retailer or distributor medical confirmation that life support equipment is required at the customer's premises. Medical confirmation would still be required but the obligations of distributors and retailers in the life support rules would be enforceable prior to the customer providing it.

When advised by a customer that a person residing or intending to reside at the customer's premises requires life support equipment the retailer or distributor would be required register that a person residing at the customer's premises required life support equipment.¹⁹

Within five calendar days of being notified of the need for life support equipment at the premises, the registration process owner would be required to send a medical

¹⁸ Rule change request p.25.

¹⁹ Proposed rule 124(1)(a) applies where the retailer is advised by the customer. This proposed rule 124(1)(a) also requires the retailer to register that a person intending to reside at the customer’s premises requires life support equipment in the retailer’s register and the date from which the life support equipment is required. Proposed rule 124(2)(a) applies where the retailer is advised by the distributor. Proposed rule 124(3)(a) applies where a distributor is advised by a customer. Proposed rule 124(4)(a) applies where the distributor is advised by the retailer.

confirmation form to the customer and information about the implications of not completing and returning the form.²⁰

A medical confirmation form should prompt the customer for information required to meet the requirement to provide confirmation from a registered medical practitioner that someone at the customer's premises requires life support equipment. A medical confirmation form issued by a retailer or distributor would need to:

- state that completion and return of the form will satisfy the requirement to provide medical confirmation under the Rules
- request from the customer the property address, the date from which the customer requires supply to the premises for the purpose of the life support equipment, certification from a registered medical practitioner confirming that a person residing or intending to reside at the premises requires life support equipment
- specify the types of equipment considered to be life support equipment in Division 1 of Part 1 of the rules
- advise the date by which the customer must return the completed medical confirmation form
- advise the customer they can request an extension to complete and return the medical confirmation form.²¹

The AER also proposes that retailers and distributors must also comply with obligations, as they would exist from 1 December 2017, to provide the customer with:

- advice that there may be planned interruptions or unplanned interruptions²² to the supply at the address²³
- information to assist the customer prepare a plan of action in the case of an unplanned interruption (required of distributors only)
- an emergency contact number (the charge for which is no more than the cost of a local call).

3.2.2 A new medical confirmation process

The AER is proposing a process for confirming the need for life support equipment at a premises be prescribed in the life support rules.²⁴ Customers would be given a

²⁰ Proposed rule 124(1)(b)(i)-(ii) applies to retailers and proposed rule 124(3)(b)(i)-(ii) applies to distributors.

²¹ Proposed rule 123A(4)

²² Only distributors are required to provide advice about unplanned interruptions

²³ The AER proposes an additional obligation for customers to be advised of the notification timeframes for planned interruptions.

minimum of 65 calendar days to complete and return the medical confirmation form.²⁵ During this period, if they do not receive medical confirmation from the customer, the registration process owner must send at least two confirmation reminder notices:²⁶ the first, no less than 21 days from the date the medical confirmation form was issued²⁷ and the second no less than 21 days from the date the first confirmation reminder notice was issued.²⁸ They would also be required to provide a customer at least one extension of a minimum of 30 calendar days to return the medical confirmation form, if the customer requests it.²⁹

The AER proposes that the confirmation reminder notice be defined in the life support rules³⁰ and must contain the following:

- the date of issue
- the date by which confirmation is required
- the types of equipment considered to be life support equipment in Division 1 of Part 1 of the Rules
- advice that:
 - the customer must provide confirmation from a registered medical practitioner that a person residing or intending to reside at the premises requires life support equipment
 - the premises is temporarily registered as requiring life support equipment until medical confirmation is received
 - failure to provide medical confirmation may result in the premises being deregistered
 - the customer can request an extension to provide medical confirmation.

3.2.3 Changes to the process for removing a customer's premises from a life support register

The AER is proposing that the choice to deregister a customer's premises is at the discretion of the business (retailer or distributor) first contacted by the customer (registration process owner). Only this business could choose to deregister a customer's premises on its life support register.

24 Proposed rule 124A

25 Proposed rule 124A(1)

26 Proposed rule 124A(2)

27 Proposed rule 124A(3)

28 Proposed rule 124A(4)

29 Proposed rule 124A(5)

30 Proposed rule 123A(1)

The AER proposes defining deregistration in the life support rules as the process by which a retailer or distributor updates its register to remove, for a particular premises, the requirement for life support equipment.³¹

If the registration process owner decides to initiate the deregistration process, in the circumstance where a customer has failed to provide medical confirmation, the registration process owner:

- must have complied with the requirements in the confirmation process
- in addition, must have taken reasonable steps to contact the customer in connection with the customer's failure to provide medical confirmation in one of the following ways:
 - in person
 - by telephone
 - by electronic means
- must have provided the customer with a deregistration notice
- may deregister the customer only if they have not provided medical confirmation before the date for deregistration specified in the deregistration notice.³²

The AER proposes defining the deregistration notice issued by the retailer or distributor in the proposed life support rules and it must:

- state the date of issue
- state the date on which the customer's premises will be deregistered, which must be at least seven days from the date of issue
- advise the customer the premises will cease to be registered as requiring life support equipment unless medical confirmation is provided before the date for deregistration
- advise the customer that the customer will no longer receive the protections under the law when the premises is deregistered.³³

Retailers and distributors must, within five days of any deregistration, send the other party a copy of the deregistration notice sent to the customer.³⁴

After receiving a deregistration request from the customer, the registration process owner:

31 Proposed rule 123A(2)

32 Proposed rule 125(4)

33 Proposed rule 123A(3)

34 Proposed rule 125(5) and proposed rule 125(6)

- must take steps to verify the deregistration request with the customer but need only do so for three days from the date of the notification
- may, after this three day period, deregister the customer.³⁵

If a business, who registered a customer's premises as requiring life support equipment following notification from the registration process owner, receives a deregistration request from the customer the business must:

- inform the customer within two days that the registration process owner is also responsible for registration
- refer the request to the registration process owner, who must contact the customer to verify the deregistration request.³⁶

³⁵ Proposed rule 125(7) and proposed rule 125(8)

³⁶ Rule 125(9) and rule 125(10)

4 Assessment framework

4.1 Rule making test

The Commission's assessment of this rule change request must consider whether the proposed rule promotes the national energy retail objective (NERO).³⁷

The NERO is:³⁸

“to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy.”

Based on a preliminary assessment of the rule change request, the relevant aspects of the NERO are the efficient operation of energy services for the long term interests of consumers with respect to safety and price.

In addition, under the NERL, the Commission must also, where relevant:³⁹

“satisfy itself that the rule is compatible with the development and application of consumer protections for small customers, including (but not limited to) protections relating to hardship customers.”

This is referred to as the consumer protections test.

Under s. 244 of NERL, the Commission may make a rule that is different (including materially different) to a proposed rule (a more preferable rule) if it is satisfied that, having regard to the issue or issues raised in the rule change request, the more preferable rule will or is likely to better contribute to the achievement of the NERO.

4.2 Proposed assessment criteria

The Commission proposes to use the following criteria to assess whether the proposed rule promotes the NERO and meets the consumer protections test:

- Will this rule change promote transparency and certainty for consumers around their protections and obligations?
- Will this rule change promote transparency and certainty for retailers and distributors around their obligations, and in turn promote efficiency?

³⁷ Section 236(1) of the NERL.

³⁸ Section 13 of the NERL.

³⁹ Section 236(2)(b) of the NERL.

- Are the proposed changes to the NERR compatible with wider consumer protections?

The following sections outline how we intend to approach our assessment of each of these criteria.

4.2.1 Promoting transparency and certainty for consumers

The NERR should provide consumers requiring life support equipment with an appropriate level of protection.

Protections and obligations relating to the registration and deregistration processes for confirming the need for life support equipment should be clear and understandable for all consumers. Such transparency and certainty is important for consumer confidence in the efficient operation of energy services.

The Commission will assess how the proposed rules will promote clarity for consumers regarding their protections and obligations.

4.2.2 Promoting transparency, certainty and efficiency for retailers and distributors

Retail and distribution businesses need to understand what their obligations are and what others' obligations are with respect to life support rules. Obligations for these businesses should be clear and provide certainty to enable the efficient operation of energy services for the safety of life support customers. Uncertain or unclear obligations can impose a compliance burden which can increase costs for retail and distribution businesses, which may be passed on to consumers.

Clear obligations and accountability for each party allows the AER to address compliance issues in an effective and efficient manner. The Commission will consider if the proposed changes would enhance the current mechanisms for compliance and enforcement of life support protection.

4.2.3 Compatibility with consumer protections

The Commission will consider whether the proposed rule changes can be made without causing problems for, or conflicting with, the development and application of consumer protections for small customers.

The "application" of consumer protections relates to consumer protections as they exist and apply, both within and outside the energy rules from 1 December 2017.

Considering the "development" of consumer protections also requires a forward-looking assessment. The Commission will assess whether the proposed changes are likely to be compatible with the future legislative development of consumer protections, and with consumer protections that may be developed through other regulatory avenues.

5 Issues for consultation

Taking into consideration the assessment framework, we have identified a number of issues for consultation. Stakeholders are encouraged to comment on these issues as well as any other aspect of the rule change request or this paper, including the proposed assessment framework.

The AER's rule change request would change the processes for:

- registration
- medical confirmation
- deregistration.

Each of these is considered below.

5.1 The registration process

As outlined in section 3.2.1, the AER's rule change would impose more obligations on distributors and retailers when customers advise them they require life support equipment at their premises. These extra obligations could impose one-off and additional ongoing costs on retailers and distributors. For instance, there are likely to be one-off costs associated with designing the medical confirmation form and for developing software and physical processes to initiate the sending of the forms. There could also be additional ongoing costs (i.e. greater than those incurred now) associated with sending the information pack.

From the consumers' perspective, enabling them to receive the protections of the life support rules from the time they inform their retailer or distributor, informing life support customers of their protections and obligations and enabling these protections to be more readily enforced could promote greater transparency and certainty. Improved understanding could also make for a smoother and more rapid process. Finally, improving customers' understanding of the protections provided in the life support rules could make consumers more confident about coming forward when they think a retailer or distributor has not met its obligations to them.

Question 2 The registration process

- (a) Please provide any information you have on the size of life support registers and how these have changed over time.**
- (b) Are the registration obligations proposed by the AER efficient and do they provide greater certainty and transparency for consumers and businesses? Are there more preferable arrangements?**

- (c) Are the notification arrangements between retailers and distributors sufficient to achieve the requirement of keeping registers up to date?
- (d) As a retailer or distributor, what additional costs would you incur to comply with the changes proposed to the registration process?
- (e) Does the information pack proposed in the rule change request provide the appropriate information?

5.2 The medical confirmation process

As outlined in section 3.2.2, the AER's rule change prescribes a new process for obtaining medical confirmation from a customer that has advised a retailer or distributor that life support equipment is needed at their premises.

Complying with this process could impose one-off and additional ongoing costs on retailers and distributors. For instance, there are likely to be one-off costs associated with designing the notices, developing software and physical processes to track the process. There could also be additional ongoing costs (i.e. greater than those incurred now) associated with the sending of the notices.

From the consumer's perspective, prescribing the process for obtaining medical confirmation could promote greater transparency and confidence in the operation of energy services. However, it also requires consumers to provide medical confirmation within the period prescribed in the process.

Question 3 The medical confirmation process

- (a) Is the medical confirmation process proposed in the rule change request appropriate for consumers, retailers and distributors?
- (b) As a retailer or distributor, what additional costs would you incur to comply with the changes proposed to the registration process?

5.3 The deregistration process

As outlined in section 3.2.3, the AER's rule change proposes changes to the process of removing a customer's premises from a life support register. Both retailers and distributors would be legally required to register premises but deregistration of a customer would be at the discretion of the retailer or distributor who was originally notified by the customer when they registered. This provides scope for businesses to tailor their decisions to the individual circumstances of each customer. However, it would also mean decisions by a distributor about deregistration would affect not only the size of its own life support register but also the size of the life support registers of retailers, and vice versa. There is also a question of how decisions about deregistration are compatible with the requirement to keep life support registers up to date.

Complying with the deregistration process could impose one-off and additional ongoing costs on retailers and distributors. For instance, there could be one-off costs associated with designing the deregistration notices, developing software and physical processes to track the process. There could also be additional ongoing costs (i.e. greater than those incurred now) associated with the sending of the notices.

Question 4 The deregistration process

- (a) Does a voluntary process for deregistration strike the right balance between the needs of customers and businesses?**
- (b) Should only the retailer or distributor who was originally notified by the customer when they registered be in control of the deregistration process?**
- (c) As a retailer or distributor, what additional costs would you incur to comply with the changes proposed to the deregistration process?**

6 Lodging a submission

The Commission has published a notice under s.251 of the NERL for this rule change proposal inviting written submissions. You need to lodge your submission online or by mail by 5pm Tuesday, 18 July 2017, in accordance with the requirements below.

Where practicable, submissions should follow the Commission's Guidelines for making written submissions on rule change requests. This guideline is available on the Commission's website (www.aemc.gov.au). The Commission publishes all submissions on its website, subject to any claims of confidentiality.

All enquiries on this project should be addressed to Greg Williams on (02) 8296 7800.

6.1 Lodging a submission electronically

You can lodge a submission electronically online via the Commission's website, www.aemc.gov.au, using the "lodge a submission" function and selecting the project reference code RRC0009. Your submission must be printed on letterhead, if you are submitting on behalf of an organisation, and it must be signed and dated.

6.2 Lodging a submission by mail

You can lodge your submission by post. It must be printed on letterhead, if you are submitting on behalf of an organisation, and it must be signed, dated and mailed to:

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

The envelope must be clearly marked with the project reference code RRC0009.

Abbreviations

AEMC	Australian Energy Market Commission
Commission	See AEMC
Registration process owner	The business (distributor or retailer) the customer first contacts to advise they need life support equipment at their premises
Life support rules	Part 7 of NERR
NEO	National Electricity Objective
NERO	National Energy Retail Objective
NERR	National Energy Retail Rules
NGO	National Gas Objective