



Mr Greg Williams  
Australian Energy Market Commission  
201 Elizabeth Street  
Sydney NSW 2000

18 July 2017

Dear Mr Williams,

**Strengthening protections for customers requiring life support equipment – RRC0009**

CitiPower and Powercor welcome the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation on the proposal to strengthen protections for customers requiring life support equipment.

The rule change proposed by the AER applies to jurisdictions which have adopted the National Electricity Retail Law and Rules (NERR) and does not apply to Victoria.

The protection of life support customers is an important matter for all energy stakeholders and we continue to take a keen interest in any policy and legislative developments in this space.

While we strongly support the intent of the proposed rule change, we note the following:

- we support the establishment of a central registry for life support customers (LSC);
- should no central registry be established, then as a secondary option we support enhancements to the Market Settlement and Transfer Solution (MSATS) database to allow distributors to notify retailers of necessary information on LSC; and
- notification by a distributor to a retailer that a customer is no longer a LSC should be sufficient to allow the customer to be deregistered.

We expand on these points below.

**Registration**

There is currently no national life support register. In Victoria, retailers are the custodians of and hold all customer information, including LSC information. Retailers register LSCs when contacted by the customer. Should a customer contact their distributor directly, then the distributor would refer the customer to their retailer for life support registration.

The proposal that either the retailer or distributor can register the customer will lead to confusion, which could be remedied by the establishment of a central registry by the Australian Energy Market Operator (AEMO).

Should no central registry be established, as a secondary option, we support enhancements to the MSATS database which at a minimum, include facilitating a bi-directional exchange of customer information between distributors and retailers. At the current time, market systems are limited to retailers providing customer information to distributors; distributors are not in a position to notify customer information to retailers.

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**Deregistration**

Should a distributor receive written advice from a customer that they are no longer a LSC and provide it to the retailer, deregistration is not automatic. Distributors still need to await confirmation from the retailer before distributors can remove the LSC from their database. We consider that the distributor should be able to provide this written advice to the retailer as evidence, and the customer is deregistered automatically.

**Other matters**

We support:

- the development of a LSC information template to ensure harmonised information is collected by all parties;
- the development of a categorisation process for the “other” category of life support equipment, which allows distributors to prioritise customers with life threatening medical conditions in emergency response situations;
- consideration of a biennial re-certification process for LSCs aligned with existing requirements to improve the accuracy of the register; and
- consideration that the wording for “at least” one extension for a minimum of 30 days be removed to ensure definitive timeframes for the process. Otherwise this process may be extended for an indefinite period, and means a retailer or distributor could be required to give multiple extensions without a maximum term.

We would be pleased to discuss any aspect of this response with the AEMC. Please contact Joanne Parry on 03 9683 4088 or [jparry@powercor.com.au](mailto:jparry@powercor.com.au).

Yours Sincerely



**Brent Cleeve**  
**Head of Regulation**