



24 November 2017

Mr Richard Owens
Australian Energy Market Commission
Level 6, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Owens

Strengthening protections for customers requiring life support equipment

I have been asked as Chair of the Information Exchange Committee (IEC) to write in respect of this above mentioned matter. As you may be aware, the IEC is the body responsible for the development and changes to the electricity Business to Business (B2B) procedures.

The AEMC is currently consulting on changes to Life Support obligations which directly affect retail and distribution businesses in the management of life support customers. At the IEC's recent meeting, held on Tuesday 21 November 2017, the AEMC provided a briefing on the life support rule change proposal being considered, seeking advice from the IEC on (1) the time for implementation of these reforms; and (2) the extent that the rules need to prescribe the nature of the content.

The IEC understands that the AEMC's draft determination proposed a six month implementation.

While the IEC fully supports the general principle of improving life support processes between retailers and distributors, the IEC also wishes to ensure that those processes are robust and efficient.

The AEMC has acknowledged in their draft determination (p28) that there are now parallel obligations on both retailers and distributors in the sharing of information and that B2B processes may require updating.

In order for the IEC to manage the development and implementation of the new information processes, this will require a period of proposal development, B2B procedure consultation and then system implementation.

The IEC is concerned that industry cannot meet the proposed deadline for these changes to ensure that the sharing of life support information is undertaken via a robust and efficient process. A rushed implementation is more likely to create errors in information sharing resulting in information relating to life support customer information not being properly shared or not being accurately maintained.

Therefore, the IEC submits that a six month implementation for any change requiring system and process change involving all retailers and distributors is inadequate to meet the

requirements of efficient and robust processes and strongly urges the AEMC to allow a minimum of 12 months for the necessary design, consultation and process/system development to take place.

On the issue relating to how much should the rules prescribe relating to the nature of the information to exchange, the IEC discussed this and considers that the rules should provide the head of power with the B2B procedures outlining the nature of the information to be exchanged. This is recognising that technology and modes of communication do change, and the rules should provide that flexibility.

Should you wish to discuss any matters relating to this letter, please feel free to contact me at john.pittard@bigpond.com.



John Pittard

Chair, Information Exchange Committee