



8 November 2017

Mr John Pierce  
Chairman  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Ref: RRC0009

Submitted online: [www.aemc.gov.au](http://www.aemc.gov.au)

Dear Mr Pierce

**Strengthening Protections for Customers Requiring Life Support Equipment — Draft Determination**

Origin Energy (Origin) appreciates the opportunity to comment on the Australian Energy Market Commission's (the Commission) Draft Determination on Strengthening Protections for Customers Requiring Life Support Equipment.

In principle, Origin supports the proposed Preferred Rule change. We believe the proposed rules will create clearer obligations for the exchange of life support information between retailer and distributors regarding life support registration and de-registration as well as the customer requirements to provide medical confirmation of equipment.

Origin, however, believes that in order for the Rules to be operationally effective, a full review of B2B Procedures need to be conducted with relevant system and process changes made (if required). The Preferred Rule adds complexities that involves parallel obligations on retailers and distributors with regards to the exchange of life support records which do not form part of the current Rules. Origin believes that it is critical that all potential scenarios are planned and tested in the market to ensure that there is no failure by either party to provide the relevant notifications.

For example, there will need to be robust processes in place to deal with situations where a customer informs a distributor of the life support requirements, the distributor tells Retailer One, but the customer cancels the contract with Retailer One during the cooling off period. Distributors do not have account information and there will need to be system triggers for the distributor to pass this information to Retailer Two. Further, the registration of life support equipment triggers Government funded rebates to relevant customers. If retailers are not the holder of the registration information, processes will need to be put into place for the distribution to provide confirmation of the relevant paperwork.

Origin is thus concerned that the proposed 6 months implementation timeframe will not be adequate time to conduct industry consultation, amend B2B Procedures through a AEMO consultation process (if necessary) and then ensure system and processes are tested and implemented. All parties need to be operationally compliant in order for the Rule to work and Origin is concerned that an expedited timeframe may lead to adverse outcomes. Given the above, Origin believes a 12 month minimum implementation timeframe could set with the final effective date of the Rule made once the B2B Information Exchange Committee (IEC) has completed a review of system and process requirements.

Should you have any questions or wish to discuss this information further, please contact Caroline Brumby on (07) 3867 0863.

Yours sincerely

A handwritten signature in blue ink, appearing to read "K. Robertson".

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