



Mr Benn Barr  
Chief Executive  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

7 September 2020

Dear Mr Barr,

**Re: Endorsement of PIAC's Submission to Consultation Paper Maintaining Life Support Customer Registration when Switching**



The Physical Disability Council of NSW is the peak body representing the 1,097, 200 people living with physical disability across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live in metropolitan, rural and regional areas of NSW. PDCN's core function is to influence and advocate for the achievement of systemic change to ensure the rights of all people with a physical disability are improved and upheld.

PDCN has reviewed the submission prepared by the Public Interest and Advocacy Centre (PIAC) in response to the Australian Energy Market Commission's consultation paper, *Maintaining Life Support Customer Registration when Switching*. PDCN endorses PIAC's submission and would seek to make a few additional points specific to our members' interests. We also appreciate that we have been able to meet with representatives of the AEMC to discuss the changes.

***Deregistration of Life Support Registration on changing retailers***

PDCN is very concerned that an individual can be removed from the Life Support Register if they change retailers and do not notify the Distributor (Rule 125(14)).

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Whilst we appreciate that the Distributor is obligated to make a number of attempts to contact the individual prior to deregistering them, we are concerned that it can be quite difficult to contact many of our members, who may rely on assistive technology to communicate. Weighing up the potential grave risks associated with deregulation of a customer in need of life support versus the minimal economic risks to the distributor, we believe that it should always be assumed that the individual requires life support *unless the distributor is otherwise notified*.

### **Requirement to resubmit medical confirmation**

As many people with physical disability have permanent conditions, it can be superfluous to have to reconfirm disability status. The requirement to update medical confirmation when there is no change in an individual's condition, is frustrating for persons with permanent disabilities and can also be complicated, especially when individuals may have restricted physical mobility and may need support from others to physically attend a doctor's surgery.

PDCN would like to see a system to allow individuals to indicate that their disabilities are permanent and ongoing and bypass the need to provide updated information when they switch retailers or move house.



### **Interest in continued engagement**

PDCN is keen to continue to engage with the AEMC in relation to the proposed changes. Please refer any questions or queries direct to Hayley Stone, Senior Policy Officer, at [hayley.stone@pdcnsw.org.au](mailto:hayley.stone@pdcnsw.org.au), or phone: (02) 9552 1606.

Yours sincerely,

Hayley Stone  
Senior Policy Officer

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