



Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

By electronic lodgement: [www.aemc.com.au](http://www.aemc.com.au)

3 September 2020

### **RRC0038 – Maintaining life support customer registration when switching**

Alinta Energy welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Consultation Paper on the proposed Maintaining life support registration when switching Rule Change (the Consultation Paper).

Alinta Energy, as an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3,000MW and more than 1.1 million electricity and gas customers has a strong interest in the effectiveness and viability of the competitive energy retail market.

#### **The ability of technology to provide a broader solution**

The primary purpose of the proposed rule change is to remove the need for a life support customer, when transferring retailers, to visit a medical practitioner and avoid the associated costs of doing so. However, a material proportion of these customers are still required to visit a medical practitioner for the purposes of meeting the eligibility requirements for government concessions. In this respect the proposed rule change does not solve the issue it seeks to address.

In response to the COVID-19 pandemic, medical practitioners are now conducting Telehealth appointments and providing electronic information exchanges with their patients. Alinta Energy views this technological improvement in the administration of healthcare as an opportunity to resolve the underlying issues of inconvenience, travel and cost for life support customers. We encourage the Commission to consult with industry and government departments to explore this as a non-regulatory solution that would have a greater impact on the challenges being faced by these customers.

#### **A solution under the current regulatory framework**

Alinta Energy notes that the issue raised in the proposed rule change only occurs if the losing retailer is the Registration Process Owner (i.e. if the customer had only provided medical confirmation to the losing retailer). Under the existing rules, when a customer registers for life support status with their distributor, life support status is maintained with their distributor when the customer changes retailers.

Hence, a solution under the current regulatory framework is to oblige retailers to inform transferring-in life support customers that if they wish to maintain life support status at the premises, and avoid life support re-registration when transferring retailers in the future, they can do so by registering for life support status with their distributor. This approach would give the customer the opportunity to avoid the burden of life-support re-registration and remove the barrier of switching retailers in the future. This could be achieved by simply updating retailer's medical confirmation forms to reference the continuity of life support status if the customer registers directly with their distributor.

Alinta Energy would welcome further discussion with the Commission on any of the matters raised in this response. I may be contacted on (03) 8533 7244.

Yours sincerely,

A handwritten signature in blue ink on a light blue background. The signature is stylized and appears to be 'AK' followed by a long horizontal line.

**Ante Klisanin**  
Regulatory Manager