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Maintaining Life Support Customer Registration When Switching (RRC0038)

Essential Energy welcomes the opportunity to provide a submission to the Australian Energy Market Commission (the Commission) on its *Maintaining Life Support Customer Registration When Switching Consultation Paper* (the consultation paper). Energy Networks Australia has also made a submission to the directions paper, which Essential Energy supports.

Essential Energy recognises the fundamental importance life support requirements provide vulnerable customers in ensuring appropriate support mechanisms and protections are available. For this reason, Essential Energy considers it appropriate to review life support customer switching arrangements to confirm they are delivering outcomes that meet expectations.

Support for the Rule Change

Under existing life support rule provisions, when a customer first contacts either their retailer or Distribution Network Service Provider (DNSP) requesting to be treated as a life support customer under the rules, this party becomes known as the “registration process owner” (RPO), responsible for initially registering the customer and registering and documenting their medical confirmation in line with the customer’s circumstances.

Essential Energy understands that when a life support customer subsequently changes energy retailers or move premises, they are then required to resubmit their associated medical certificates and other supporting information to either their new retailer or DNSP, essentially repeating the process already undertaken. This leads to a potentially unnecessary administrative burden and cost imposed for vulnerable customers to complete their transfer and may even deter customers switching retailers altogether. As such, the Energy and Water Ombudsman of NSW (EWON) proposes to allow for the transfer of medical information and documentation to occur between the outgoing and incoming life support RPO, following a request from a customer to change retailer or premises.

Essential Energy agrees with EWON’s rationale and as such, we strongly support RPOs being able to transfer medical information as a method of reducing associated burdens for life support customers. This will enable greater choice for vulnerable customers and is consistent with the application of consumer protections across the NER.

As outlined within the consultation paper the development of the final rule is dependent on a comprehensive consideration of relevant privacy laws.

Further Considerations

As of 30 June 2020, approximately 26% of Essential Energy's registered life support customers have no supporting medical confirmation. Currently there is no compulsion under the rules to remove a life support flag when medical confirmation is not received. This may lead to the provision of life support services to premises where these services may not actually be required, in turn unnecessarily increasing retailers and DNSPs corresponding obligations and costs.

As such, we would encourage the Commission to further consider EWON's proposal of a requirement to provide updated medical information after a set time frame to ensure ongoing applicability in a manner which balances any administrative or cost imposts for customers.

Conclusion

For the reasons above, Essential Energy agrees with EWON's proposal that the rule change will positively contribute to the National Electricity Objective and will provide appropriate support for vulnerable customers. Essential Energy thanks the Commission for their consultative approach and thorough analysis.

If you have any questions in relation to this submission, please contact Anders Sangkuhl, Regulatory Strategy Manager via anders.sangkuhl@essentialenergy.com.au or via phone 0409 968 326.

Yours sincerely,



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