



14 January 2021

Ms Anna Collyer
Chair, Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

FROM THE OFFICE
OF THE CHAIR

Level 22
530 Collins Street
Melbourne VIC 3000

Postal Address:
GPO Box 2008
Melbourne VIC 3001

Dear Ms Collyer

Draft Rule Determination – National Energy Retail Amendment – Maintaining life support customer registration when switching rule

The Information Exchange Committee (IEC) is a statutory body established under the National Electricity Rules responsible for developing and making recommendations on changing electricity business-to-business (B2B) Procedures. The IEC includes representatives from the Australian Energy Market Operator (AEMO), electricity industry retailers and distributors, competitive metering companies, embedded networks and a representative from Energy Consumers Australia. The IEC has a statutory role as set out in the National Electricity Rules (NER) (Attachment A).

The IEC has previously provided a submission to the AEMC's consultation paper on the National Energy Retail Amendment (Maintaining life support customer registration when switching) rule in October 2020. In this submission, the IEC provided feedback relating to:

- The proposed implementation timing of any major changes to the rules, noting the current ambitious regulatory forward program of work
- The two different life support scenarios that are relevant to the rule change proposal and the IEC's position on the need for achieving a balance between positive impacts for life support customers, and the costs and ability of market participants and AEMO to deliver the changes
- The need for market participants and AEMO to be able to trace and audit any proposed solution
- Challenges with the interplay between life support protections and jurisdictional concessional documentation

The IEC is pleased to provide the following feedback on the AEMC's draft determination relating to Maintaining life support customer registration when switching.

IEC support for the AEMC's approach to making a more preferable draft rule

The IEC notes that the AEMC has taken into consideration feedback it provided in response to the initial consultation paper in its consideration of developing a more preferable draft rule. In particular, the AEMC noted issues relating to weighing the costs and benefits of its proposed



solution, challenges relating to the complexity and timing of changes to MSATS, and the need for audibility in any proposed solution.

The IEC is supportive of the balanced approach the AEMC has taken when considering the materiality of the issues raised, the potential costs and likely benefits to be derived from the change, and the risks, issues and opportunities raised by different types of stakeholders.

The IEC understands that in introducing an obligation on the outgoing registration process owner to provide the customer with a copy of the medical confirmation form and / or documents used to register the customer's premises for life support will likely be completed using a manual or process-oriented approach, rather than a system-led response. Having noted that however, the IEC will consult with AEMO on potential B2B system changes that may be required as a result of this proposed change and will provide separate advice on the timing of these changes.

The IEC welcomes discussion continued collaboration with AEMC at any stage of its consultations should it be able to assist it to understand any potential B2B changes.

Should you wish to discuss further, please contact the IEC secretariat at iec@aemo.com.au.

Yours sincerely

Mr John Pittard

Chair Information Exchange Committee

cc: Violette Mouchaileh, Chief Member Services Officer

Attachment: Attachment A List of Current Information Exchange Committee Members



ATTACHMENT A

Current Information Exchange Committee Members

Member Category	Representative
Chair	Mr John Pittard AEMO director
Retailer (industry elected)	Mr David Markham Corporate Affairs, Australia Energy Council
Distributor (industry elected)	Mr Peter Price Executive General Manager Engineering, EnergyQueensland
Metering (industry elected)	Mr Robert Lo Giudice Manager, Metering Coordinator, Intellihub
Consumer representative	To be advised
Retailer (AEMO discretionary)	Mr Peter Van Loon Telstra Energy
Distributor (AEMO discretionary)	Ms Emma Youill General Manager, AusNet Services
Metering (AEMO discretionary)	Mr Doug Ross (former) Chair, Competitive Metering Industry Group
Embedded Networks (AEMO discretionary)	Mr Marco Bogaers Executive Director, Metropolis

IEC Statutory Role

In fulfilling its statutory role in relation to managing the ongoing development of B2B Procedures and any changes to them, the IEC works collaborative across the different stakeholder groups in the energy sector to:

- Make recommendations on B2B Procedure changes and oversee the consultation process.
- In conjunction with AEMO, consider implications of potential policy changes which may affect B2B Procedures and contribute to B2B Procedure delivery management and prioritisation.
- Identify B2B Procedure continuous improvement opportunities.