



3 September 2020

Ms Merryn York  
Chair  
Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2000

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

Dear Ms York,

**RE: Life Support Customer Switching RRC0038**

Origin Energy appreciates the opportunity to provide a submission in response to the Australian Energy Market Commission's (AEMC) consultation *Life Support Customer Switching*.

The Energy and Water Ombudsman NSW (EWON) has raised concerns that the current rules with respect to life support customers may be a barrier to customers switching retailers and therefore accessing better offers. EWON suggests this occurs because the National Energy Retail Rules (the Rules) may require a customer to resubmit medical confirmation for customers with life support equipment needs.

To resolve this issue, EWON propose changing the Rules to enable the transfer of medical information between outgoing and incoming life support Responsible Process Owners (RPO), where a life support customer wishes to change retailer. They consider that these changes would reduce the need for an incoming RPO to require customers to resubmit medical confirmation.

We are not aware of any evidence that demonstrates the current rules are creating either an impediment to customer switching or creating a poor customer experience.

In the 2019 Financial Year, we recorded 6,434 new accounts for customers with life support requirements. This represents a little over 8% of all Origin customers with a life support flag. Life support customers represent around 1.6% of our overall customer base. The vast majority of our life support customers are currently on market contracts.

We note customers are afforded up to four months to return the medical confirmation form; a customer with a need for life support registration is likely to have a medical appointment scheduled in this time. While not all customers receiving life support are eligible for a concession, the registration for life support protections and concessional rebates do interact with each other and it is in customers' interest to provide the completed concession and registration forms in order to obtain their concessional rebate.

We are not aware of any evidence that the provision of the medical confirmation represents a genuine barrier to customers switching retailers. Notwithstanding, we will examine our data further and will provide additional information to the AEMC at the next stage of its consultation. Furthermore, to the extent that evidence is identified that demonstrates a deficiency in the current rules, we remain open to changes which would improve customer experience and customer outcomes for life support customers.

If you have any questions regarding this submission, please contact Courtney Markham in the first instance on (03) 9821 8086 and or [Courtney.Markham@originenergy.com.au](mailto:Courtney.Markham@originenergy.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', written over a light grey rectangular background.

Sean Greenup  
Group Manager Regulatory Policy  
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