

11 January 2021

Conrad Guimaraes
Advisor
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Mr Guimaraes

RE Maintaining life support customer registration when switching

TasNetworks welcomes the opportunity to respond to the Australian Energy Market Commission's (**AEMC**) consultation on maintaining life support customer registration when moving premises or changing retailer.

As the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner in Tasmania, we care for our customers and therefore support rule amendments which make their experience easier. To that end, TasNetworks endorses the submission to the AEMC made by Energy Networks Australia (**ENA**). In particular, we note the suggestion that further work is needed beyond this rule change to pursue improvements in the life support customer experience. In addition to ENA's submission, we provide the below information.

TasNetworks recognises the fundamental importance of customer protections for those who are medically reliant on the network and is supportive of a proposed decrease in compliance burden for these customers. TasNetworks supports protections for these customers, however, we are apprehensive regarding the ability to meet certain requirements of the preferable draft rule change. Specifically, the obligation to return a customer's medical information to the customer while also meeting existing privacy laws.

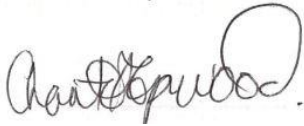
At present, TasNetworks does not hold information to verify a customer's identity in line with privacy standards. This is made more difficult by the use of medical certificates for life support registration which holds less personal information. This may result in customers being required to submit additional information to verify their identity, the outcome of this being a more complicated and lengthy process for both the DNSP and the customer. For that reason, TasNetworks anticipates that the obligations imposed under the preferable draft rule change may result in a more arduous process for our more vulnerable customers, negating the intended benefits of the proposed rule setting.

Further, TasNetworks considers that given the duration of the current regulatory arrangements, a holistic review is advisable to determine whether they are providing both essential and efficient protections to those customers who are medically reliant on the network. Not only does a review ensure that our most vulnerable customers are receiving the critical support needed through the regulatory framework, but it also ensures that this support is sustainable for the long term by not imposing an unnecessary cost burden on our wider customer base. We anticipate that this cost impost can be minimised through a

regulatory framework that permits DNSPs to provide targeted assistance to customers who are dependent on the network for medical needs. For that reason, TasNetworks welcomes a holistic review of the current rule setting to affirm that they are meeting the expectation of providing both efficient and sustainable protections to our most vulnerable customers.

Should you have any questions, please contact Shannon Culic, Senior Regulatory Analyst, via email shannon.culic@tasnetworks.com.au or by phone on (03) 6271 6751.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chantal Hopwood', with a large, stylized loop at the end of the name.

Chantal Hopwood
Leader, Regulation