

14 July 2017

Mr Greg Williams
Project Leader
Australian Energy Market Commission
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Dear Mr Williams

**Submission on the Consultation Paper: Strengthening Protections
for Customers Requiring Life Support Equipment**

The Energy and Water Ombudsman (SA) Limited ("EWOSA") welcomes the opportunity to comment on the Australian Energy Market Commission's Consultation Paper on the *Strengthening Protections for Customers Requiring Life Support Equipment* rule change request.

In this submission, the EWOSA primarily addresses matters that are specifically of interest to the EWOSA Scheme.

EWOSA is an independent Energy and Water Ombudsman Scheme in South Australia. It receives, investigates and facilitates the resolution of complaints by customers with regard to (*inter alia*) the connection, supply or sale of electricity, gas or water.

We support the proposals from the Australian Energy Regulator (AER) in their rule change request to improve the processes regarding the registration and deregistration of customers requiring life support equipment for retailers and distributors.

Given the potentially dire consequences of an electricity supply interruption for customers requiring life support equipment, it is particularly important that the proposed changes result in those customers receiving the necessary protections of the life support rules from the time their retailer or distributor are informed of their situation. It appears the proposed changes would ensure this.

The proposed rule changes also provide clarity regarding the registration and deregistration processes, as well as the responsibilities – including information provision requirements – of retailers and distributors. This will benefit both energy consumers and businesses by promoting transparency and certainty. Life support registers are also likely to be kept more up-to-date and accurate as a result.

We believe the proposed information requirements on retailers and distributors, such as notification that the customer needs to provide medical confirmation (and the associated completed form), advice about what the customer requiring life support equipment should do in the event of an unplanned interruption and the provision of an emergency contact number, are appropriate.

We also support the development of a new process for medical confirmation and for the AER's proposed process to be prescribed in the life support rules: Part 7 of the National Energy Retail Rules.

Importantly, the rule changes requested by the AER should ensure the regulator is able to enforce the protections of the life support rules in all cases.

Should you require further information or have any enquiries in relation to this submission, please email me at antony.clarke@ewosa.com.au or telephone me on (08) 8216 1851.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Antony Clarke', is positioned above the typed name.

Antony Clarke
Policy and Research Officer
Energy and Water Ombudsman SA