



3 September 2020

Conrad Giumaraes
Advisor
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Dear Conrad

Re: Maintaining life support customer registration when switching rule (RRC0038)

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Energy Market Commission's (AEMC) Consultation Paper in response to the life support rule change request from the Energy and Water Ombudsman of New South Wales (EWON).¹

Life support customer provisions are intended to support the most vulnerable members of society with managing the physical loss of electricity to their medical equipment. We support a regulatory framework that provides that targeted assistance, where life support customers are responsible for maintaining their continued life support status.

EWON submitted a rule change request to the AEMC proposing changes to the National Energy Retail Rules (NERR) that aim to facilitate the transfer of life support customers' medical information. This is proposed to require that medical information be transferred between outgoing and incoming life support registration process owners following a customer change of premises or retailer. While the proposal, if adopted, would not apply in Victoria, we consider a response is still warranted as our life support customer obligations were recently updated by our jurisdictional regulator to align with the NERR.

The intention of EWON's rule change is to remove barriers that would prevent life support customers changing retailer and benefiting from retail market competition. However, in our experience life support customers are able to change retailers and be flagged as having life support regardless of whether they provide medical confirmation or not.

We note that where we are the Registration Process Owner (RPO) for a life support customer, and the life support customer changes retailers, we currently advise the new retailer that the customer has life support requirements. However, we are unable to advise the retailer of a customer's life support status in instances where a customer moves premises. This is because we cannot track if a customer moves properties and therefore cannot carry forward their associated history. As such, any obligation on us as the RPO to advise the customer's retailer where the customer has moved premises is not one we can fulfil.

EWON note that, in considering their proposal, the AEMC may also wish to consider the appropriateness of a requirement to provide updated medical confirmation for continued life support registration after a set timeframe. We consider it appropriate for the rules include a requirement for life support customers to provide updated medical confirmation periodically, in order to maintain their life support status. This would ensure that the life support customer register is more accurate, and that distributors only provide life support services to premises where they are genuinely required.

¹ AEMC, *Maintaining life support customer registration when switching*, Consultation paper, 6 August 2020.

Where a customer signs up with a retailer as a life support customer and then fails to provide medical confirmation to the registration process owner, there is not currently a requirement in the rules to deregister the premises.² Whilst not included in EWON's proposal, we consider the rule should be amended to ensure that the registration process owner deregisters the life support customers in line with the rules, if medical confirmation is not required.

Life support registers with up-to-date information that more accurately reflect the needs of customers will enable us to prioritise genuine life support customers when managing network outages. We provide at Appendix A information on the growing number of customers on our life support register, as well as the number of who have provided medical confirmation since 3 February 2019.

The development of any final rule should be based on a comprehensive assessment of the benefits and costs associated with its implementation, including any additional risks and complexities associated with increased data flows between parties. Furthermore, we support the AEMC ensuring that any final rule does not raise any issues or breaches under privacy laws.

Should you have any queries, please contact Elizabeth Carlile on 0419 878 852 or ecarlile@powercor.com.au.

Yours sincerely,



Brent Cleeve
Head of Regulation
CitiPower, Powercor and United Energy

² NERR, 124(1)(b)(ii), 124(4)(b)(ii), and 124A(2)(d)(iii).

Appendix A - Life support customer statistics

A1. Growth of life support customer numbers

Table 1 Number of registered life support customers

	CP	PAL	UE	Total
Jul-16	1,104	6,203	4,003	11,310
Jul-17	1,139	7,017	4,516	12,672
Jul-18	1,462	9,077	5,586	16,125
Jul-19	1,666	10,573	6,719	18,958
Sep-19	1,761	11,303	7,046	20,110
Aug-20	1,932	12,572	8,140	22,644

Source: CitiPower, Powercor and United Energy

A2. Medical confirmation for life support customers

Below is a record of life support customers who have registered, or updated their existing registration, since 3 February 2019 and whether they have provided medical confirmation.

Table 2 Medically confirmed and unconfirmed life support customers

	CP		PAL		UE		Total	
	Volume	%	Volume	%	Volume	%	Volume	%
Medical confirmation	305	32%	2,384	37%	1,360	38%	4,049	37%
No medical confirmation	659	68%	4,064	63%	2,189	62%	6,912	63%
Total	964		6,448		3,549		10,961	

Source: CitiPower, Powercor and United Energy