

Our ref: 0743-1608241381-168

28 August 2020

Australian Energy Market Commission
GPO Box 2603 Sydney NSW 2000

Dear Sir/Madam

RRC0038: Maintaining life support customer registration when switching, Consultation paper, 6 August 2020

Thank you for the opportunity to make a submission on the proposed reforms the National Energy Retail Rules (**NERR**) to enable the transfer of medical information between outgoing and incoming life support registration process owners (the **Reforms**).

Background to EWOQ

The Energy and Water Ombudsman Queensland (**EWOQ**) provides a free, fair and independent dispute resolution service for small electricity and gas customers across Queensland and water customers in South East Queensland who are unable to resolve a dispute with their supplier.

This submission is based on our experience as an external dispute resolution scheme dealing with residential and small business energy customer complaints in Queensland.

Feedback on the Reform

EWOQ welcomes the Reforms and supports the decision of our colleagues at the Energy Water Ombudsman New South Wales (**EWON**) to propose these.

We support, in principle, reforms which create fair outcomes for customers, particularly vulnerable customers. It appears that the NERR as it is currently drafted does not guarantee a just outcome for life support customers (some of whom may be vulnerable) and that this issue will be addressed by the Reforms.

EWOQ's position is that life support customers should, to the fullest extent possible, have the same consumer rights as other customers. If rules or processes function to impose additional responsibilities or burdens on life support customers there must be a strong justification for these rules or processes. It is not clear, in context, what justification there could be in requiring a customer who has previously obtained medical certification for their life support to resubmit new medical certification before effectively switching retailers or premises.

We agree with the proponents of the Reforms that a requirement to resubmit medical certification could act as a deterrent to a customer in switching retailers (or moving premises) as the cost could make any change uneconomic or even infeasible.

EWOQ supports the Reforms, including the proposed process for the transfer of information from the outgoing life support registration process owners to the incoming life support registration process owners. In other regards we do not comment specifically on issues of the assessment framework, drafting, customer consent, privacy nor risk, but support the Reforms in principal.

If you require any further information regarding our submission, please contact Ms Lyndal Bubke, Principal Policy Officer on 07 3087 9423 or lyndal.bubke@ewoq.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jane Pires', with a stylized flourish at the end.

Jane Pires

Energy and Water Ombudsman