

3 September 2020



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

Dear Ms York

Consultation Paper: Maintaining life support customer registration when switching

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) in response to the *Maintaining life support customer registration when switching* consultation paper.

The attached submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network); and
- Regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail).

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me or Charmain Martin on 0438 021 254.

Yours sincerely

A handwritten signature in cursive script that reads "Trudy Fraser".

Trudy Fraser
Manager Regulation

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Energy Queensland

**Submission to the
Australian Energy Market Commission**

**Consultation paper –
Maintaining Life Support Customer
Registration when Switching**

Energy Queensland Limited
3 September 2020



About Energy Queensland

Energy Queensland Limited (Energy Queensland) is a Queensland Government Owned Corporation that operates businesses providing energy services across Queensland, including:

- Distribution Network Service Providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- affiliated contestable business, Yurika Pty Ltd (Yurika), which includes Metering Dynamics Pty Ltd (Metering Dynamics).

Energy Queensland's purpose is to 'safely deliver secure, affordable and sustainable energy solutions with our communities and customers' and is focused on working across its portfolio of activities to deliver customers lower, more predictable power bills while maintaining a safe and reliable supply and a great customer service experience.

Our distribution businesses, Energex and Ergon Energy Network, cover 1.7 million km² and supply 34,000GWh of energy to 2.25 million homes and businesses each year.

Ergon Energy Retail sells electricity to 738,000 customers in regional Queensland.

Energy Queensland also includes Yurika, an energy services business creating innovative solutions to deliver customers greater choice and control over their energy needs and access to new solutions and technologies. Metering Dynamics, which is a part of Yurika, is a registered Metering Coordinator, Metering Provider, Metering Data Provider and Embedded Network Manager. Yurika is a key pillar to ensuring that Energy Queensland is able to meet and adapt to changes and developments in the rapidly evolving energy market.

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1 Introduction

On 6 August 2020, the Australian Energy Market Commission (AEMC) published a consultation paper on maintaining life support customer registration when switching (consultation paper). The consultation paper follows the submission of a rule change request by the Energy and Water Ombudsman of New South Wales (EWON) seeking changes to the National Energy Retail Rules (NERR) to maintain life support registration when a customer changes premises or their electricity retailer.

The AEMC has requested feedback on a number of questions in relation to EWON's rule change request, including:

- The issues relating to life support obligations and switching identified by EWON and the materiality of those issues;
- The proposed solutions and expected costs and benefits; and
- Implementation of the proposed rule change.

The AEMC is seeking feedback on the issues and questions raised in the consultation paper by 3 September 2020 to assist in assessing the proposed rule change. Energy Queensland's comments are provided in sections 2 and 3 of this submission.

2 General comments

Energy Queensland welcomes the opportunity to provide feedback in response to the AEMC's consultation on maintaining life support registration when switching. This submission is provided by Energy Queensland, on behalf of its related entities, distribution network service providers, Energex and Ergon Energy Network, and regional service delivery retailer, Ergon Energy Retail.

Energy Queensland is committed to safely delivering secure, affordable and sustainable energy solutions with our communities and customers. We take our responsibilities with respect to life support customers very seriously and support, in principle, efforts to ensure appropriate protections continue to be provided to customers who require the use of life support equipment. We also support efforts to enhance customers' ability to engage in the electricity market. We therefore acknowledge the concerns raised by EWON that costs associated with the resubmission of medical confirmation for life support programs may deter some life support customers from switching retailers and could be viewed as a barrier not faced by other customers. We appreciate that the requirement to resubmit medical confirmation in certain circumstances may be inconvenient and costly for some customers if a visit to a medical practitioner is required specifically for this purpose. However, based on the information provided, it is not clear to Energy Queensland that the proposed change to the current life support processes is a proportionate, efficient or cost-effective solution to the issues raised by EWON.

It is Energy Queensland's understanding that the objectives of the registration, medical confirmation and deregistration processes implemented in 2019 (following extensive stakeholder consultation) were to address concerns about the existing life support arrangements, including:

- ensuring that customers requiring life support equipment are validly registered in order to receive the life support protections;
- clearly defining participants' roles and responsibilities for registering customers with life support equipment and seeking medical confirmation; and
- ensuring the ongoing accuracy of participants' life support registers (in recognition of the growing numbers of customers on life support registers who had not provided medical confirmation and increasing numbers of inaccurate and out-of-date registrations).

While Energy Queensland is supportive of initiatives that will make it easier for life support customers to participate in the market, any such initiatives should strike an appropriate balance between protecting customers who are legitimately at risk in the event of a temporary, unexpected loss of power supply, and the avoidance of any unnecessary operational and administrative burden for participants that may lead to increased electricity prices for all customers.

Specific concerns Energy Queensland has in relation to the proposed rule change include:

- **Materiality of the issue** –Energy Queensland agrees with the AEMC’s assessment that the materiality of this issue is unclear. We understand that obtaining new medical confirmation may be a financial burden for low income households and customers in hardship. We also accept that customers residing in remote and isolated areas of Queensland may have greater difficulty in obtaining new medical confirmation in a timely manner than customers in other areas. However, it is unclear whether the need to resubmit medical confirmation is a key factor preventing customers whose premises require life support equipment from switching their retailer. Further evidence is therefore required to demonstrate the extent of the problem identified by EWON.
- **De-registration is currently discretionary** - The deregistration process currently allows the registration process owner (RPO) to maintain life support registration without the customer requesting life support protections providing medical confirmation. This issue has resulted in a significant growth in the numbers of registered life support customers who have not provided medical confirmation. For example, in South East Queensland, 13,355 customers were registered by retailers as requiring life support equipment between February 2019 (when the new life support processes were introduced) and July 2020. Of those, only 6,797 have provided medical confirmation (51 per cent), and the remaining 6,558 (who have not provided medical confirmation) remain registered as requiring life support. Issues would therefore likely arise under the proposed solution if a life support customer seeks to switch retailer where no medical confirmation has previously been provided.
- **Current processes do not apply to legacy life support customers** – Customers who were registered as having life support equipment prior to the commencement of the new processes in February 2019 continue to receive the protections whether they have provided medical confirmation or not. There are approximately 13,000 legacy life support customers in Queensland who registered prior to February 2019, of which only three per cent registered with their distributor. Therefore, legacy customers who have not previously provided medical confirmation would still be required to do so to support their life support status when switching retailers.
- **Allocation of roles and responsibilities** - In Energy Queensland’s view, the current allocation of responsibilities to customers and participants (retailers and distributors) remains appropriate and reasonable. We consider that responsibility for informing either the retailer or distributor of the need for life support equipment at a premises, providing medical confirmation and notifying of a change of circumstances rests with the customer requiring the protections. It is our view that a shift in roles and responsibilities could potentially lead to errors and a further growth in invalid registrations and out-of-date life support registers. Furthermore, we do not consider that the requirement for a customer to provide medical confirmation should be viewed as an impediment, but rather as an appropriate mechanism for customers with life support equipment to engage with their retailer to ensure their needs are recorded and that participants’ life support registers are kept accurate and up-to-date.

- **Security of information sharing** - Any information sharing between participants must be in accordance with privacy obligations to securely protect the personal information they hold from misuse, interference, loss, and from unauthorised access, modification or disclosure, with a higher level of protection for sensitive information, such as health information. Entities can face serious consequences for a significant breach of privacy obligations and therefore any proposed solution would need to safeguard customers' sensitive health information and minimise the risk of inadvertent transfer to an incorrect recipient. Given there are security risks associated with the proposal for participants to share sensitive health information, Energy Queensland reinforces our view that responsibility for providing medical confirmation to a new retailer should remain with the life support customer.
- **Costs of system and process changes** – If it is determined that medical confirmation documents should be shared between participants using market systems, it needs to be recognised that there is currently no ability to attach documentation to B2B communications. Therefore, costs associated with changes to the B2B platform and participant systems and processes would be incurred to automate the information sharing process. This has not been acknowledged by EWON.
- **Minimising complexity and administrative burden** – Energy Queensland considers that any proposed solution should not add additional complexity to what is already a complex process. If the solution proposed by EWON is adopted and the B2B platform is not altered to enable the new process to be automated, the administrative burden for participants will likely increase. This has not been acknowledged by EWON.

In light of the above, Energy Queensland considers that a cost-benefit analysis of the solution proposed by EWON (and potential alternative solutions) is essential to ensure that the costs relating to any necessary changes to the B2B procedures and platform and participants' systems and processes do not outweigh the benefits, particularly in consideration of the deficiencies in the current processes that allow life support customers to remain registered without providing medical confirmation.

As alluded to above, Energy Queensland considers there are issues with existing life support arrangements that need to be prioritised for consideration by the AEMC to improve the current processes and ensure the validity of life support registrations and accuracy of life support registers. As participants incur significant administrative and operational costs in complying with their life support obligations (many of which are subject to substantial civil penalty), we consider that ensuring life support registrations are valid and registers are up-to-date and accurate is critical to the operation of the life support regime while minimising the costs to provide life support protections (which are ultimately reflected in all customers' electricity bills). These issues are as follows:

- As the deregistration process is currently discretionary, participants are permitted (and are arguably incentivised) to allow customers to retain life support registration without medical confirmation. As noted above, this has resulted in a significant volume of customers remaining registered as having life support equipment without medical confirmation. In Energy Queensland's view, the requirement for the RPO to follow the deregistration process if medical confirmation is not provided by the customer within a reasonable timeframe should be considered.

- Legacy customers registered prior to February 2019 continue to maintain life support protections whether they have provided medical confirmation or not. Given the significant growth in the number of life support customers and the substantial penalties on participants for non-compliance, it may be appropriate to extend the medical confirmation and deregistration processes to all existing life support registrations, including those registered prior to February 2019.
- The definition of “life support equipment” provided in the NERR includes specific items of critical medical equipment required for life support, including oxygen concentrators, dialysis machines, respirators, phototherapy equipment and ventilators. However, the definition also allows for “any other equipment that a registered medical practitioner certifies is required for a person residing at the customer’s premises for life support”. The non-specific nature of the term “any other equipment” means that the definition is open to interpretation by customers, customer advocates and medical practitioners and can be applied to a wide range of both critical and non-critical medical and non-medical equipment, including heating and air-conditioning or assistance devices. Energy Queensland is concerned that the continued growth in volumes of life support registrations may, in some instances, be as a result of a generous application of the term “any other equipment” by medical practitioners to not only equipment that is critical to supporting a patient’s life on an ongoing basis but also to non-critical equipment that assists in improving a patient’s “quality of life”. While we support medical practitioners continuing to have the flexibility to determine which equipment meets the definition of life support equipment, we consider there may be value in strengthening the definition to specifically state that it only applies to equipment that is critical to managing a patient’s life-threatening medical condition and without which, in the event of an unexpected loss of power supply, the customer’s life may be endangered. This would ensure that important life support protections are provided to those customers who are genuinely at risk.

Our feedback on the questions raised in the AEMC’s consultation paper is provided in section 3 of this submission. We are available to discuss this submission or provide further detail regarding the issues raised.

3 Specific comments

Energy Queensland provides the following comments on the questions raised in the consultation paper for consideration:

CHAPTER 5 – SECTION 5.1 – ISSUE IDENTIFIED BY EWON

<p>1. Do stakeholders agree that requirements for medical confirmation to be resubmitted deter life support customers from changing premises or retailer? If so, what are the main barriers or costs that may deter switching activity by life support customers?</p>	<p>Energy Queensland understands that the current requirement to resubmit medical confirmation could be perceived by some to be a barrier that may deter customers from switching retailers, but the extent of the problem identified by EWON is unclear.</p> <p>In Energy Queensland’s view, the requirement to provide medical confirmation should not be viewed as an impediment to customers participating in the market, but rather as a mechanism for customers with life support equipment to engage directly with their new retailer regarding their life support needs and as a means for the retailer to confirm the validity of those needs and maintain accurate and up-to-date records.</p> <p>We also note that (in accordance with rule 124A of the NERR), upon advising the new retailer of their need for life support protections, the customer has a minimum of 50 business days within which to provide the required medical confirmation, during which the RPO must send two reminder notices. The customer also has the ability to request at least one extension of a minimum of 25 business days.</p> <p>Therefore, in practice, the current process effectively provides customers with a number of months within which to provide the retailer with a new confirmation from a registered medical practitioner. We consider this timeframe is reasonable and should not be viewed as a deterrent to switching retailers.</p>
<p>2. What is the appropriate allocation of responsibility between life support customers and businesses with respect to the resubmission of medical confirmation?</p>	<p>Energex, Ergon Energy Network and Ergon Energy Retail acknowledge and accept their responsibilities under energy legislation to maintain a record of customers with life support equipment and ensure that their premises are not de-energised and are appropriately informed of any planned interruptions to supply. However, we remain of the view that the fundamental responsibility for informing the new retailer of the existence of a person requiring the use</p>

	<p>of life support equipment at a premises lies with the customer. The protections enshrined in energy legislation are intended to be a safety net for customers and it is our understanding that the objective of the current administrative process is to mitigate the risk that life support needs will not be shared between the customer's retailer and the relevant distributor. Without direct involvement from the customer in the registration process, no matter how robust the system, there is a risk that customers with life support equipment will not be correctly registered, potentially resulting in a poor outcome for the customer and a penalty for the retailer or distributor.</p>
<p>3. How do retailers and DNSPs record, share, use and maintain life support information in practice?</p>	<p>Energex, Ergon Energy Network and Ergon Energy Retail administer robust processes for the collection, use, maintenance and sharing of information with respect to customers with life support equipment in accordance with the NERR, the B2B procedures and privacy legislation.</p>
<p>4. Are there any other obligations imposed on retailers, DNSPs or customers relating to life support outside of the NERR (for example under jurisdictional concession schemes)? If so, what are those obligations and how do they interact with the obligations under the NERR?</p>	<p>The Queensland Government provides two forms of financial assistance to customers:</p> <ul style="list-style-type: none"> • The Electricity Life Support Concession which is available to seriously ill customers who use a home-based oxygen concentrator or kidney dialysis machine; and • The Medical Cooling and Heating Electricity Concession Scheme which is available to customers who have a chronic medical condition aggravated by changes in temperature. <p>Both forms of assistance are provided directly from the Queensland Government to the customer and appear to be complementary with, but do not relate to, the NERR obligations.</p> <p>We note that the Electricity Life Support Concession does not expire, but that the Medical Cooling and Heating Electricity Concession requires renewal every two years.</p>
<p>5. Do stakeholders agree with the Commission's description of scenarios where life support customers may be required to resubmit medical confirmation? Should additional scenarios be contemplated?</p>	<p>Energy Queensland agrees that customers may currently be required to resubmit medical confirmation in the scenarios outlined in the consultation paper.</p>

<p>6. What are the costs and benefits of rule 125(14) relating to life support deregistration? Are there risks that life support customers will be deregistered inadvertently?</p>	<p>Subrule 125(14) of the NERR relates to deregistration by a distributor where there is a change in the customer's retailer and provides that the distributor <u>may</u> deregister the customer's premises. Energex and Ergon Energy Network do not initiate deregistration upon transfer between retailers if the customer is distributor-registered to ensure the customer continues to have appropriate life support protections. A life support notification is sent to the incoming retailer to advise of the requirement. If the customer is retailer-registered, the life support requirement is not currently passed between retailers, but the distributor will advise the new retailer through the quarterly reconciliation process. Given this safeguard, there is minimal risk that a life support customer will be deregistered inadvertently in Queensland. However, there is a risk that the new retailer may not be aware of the life support requirement for a period of time.</p>
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CHAPTER 5 – SECTION 5.2. – ISSUE MATERIALITY

<p>1. What are the short and long term impacts (financial and other) on life support customers of higher barriers for engagement in the retail market?</p>	<p>Energy Queensland acknowledges that, for some customers, engagement in the retail energy market can be a confusing experience and generally supports efforts to enable customers to engage more easily. We also acknowledge that the requirement for customers to resubmit medical confirmation when they switch to a new retailer has the potential to complicate the process.</p> <p>However, as noted above, this requirement is not intended to be an impediment, but rather a mechanism to ensure that customers with life support equipment engage directly with their new retailer to advise and confirm their specific requirements.</p> <p>Further, while we support the intent of this proposal, i.e. to make engagement in the energy market easier, we note that EWON has not included evidence to demonstrate the materiality of the issue or quantify the costs and benefits of the proposed solution.</p>
<p>2. What are stakeholder views with respect to the difficulty and costs of customers securing medical confirmation when they change premises or retailer?</p>	<p>Energy Queensland acknowledges that customers with life support equipment may experience some difficulties obtaining new medical confirmation when they change premises or retailer. These difficulties may be due to a variety of reasons, such as limited mobility, limited access to transport, or living in remote locations. Therefore, as a</p>

	<p>customer and community focussed business, Energy Queensland’s distributors and retailer seek to work with customers to enable a smooth transition.</p> <p>We note that, once initially registered for life support status, customers have a minimum of 50 business days (over two months) to provide the required medical confirmation, with further provision for extended timeframes. We consider the current timeframes for provision of medical confirmation are sufficient.</p> <p>However, Energy Queensland considers there would be value in developing a standard medical confirmation form accepted by all participants that would enable customers to resubmit the same form when moving or switching, thereby avoiding the inconvenience and costs associated with obtaining a new medical confirmation.</p>
<p>3. What quantitative or qualitative evidence do stakeholders have with respect to the issue raised by EWON that may clarify its materiality?</p>	<p>As a retailer only operating in regional Queensland, Ergon Energy Retail’s operating circumstances are different to those of other retailers. Following feedback from customers, it was decided that Ergon Energy Retail would not require customers to resubmit medical confirmation if they are already registered in its life support program when moving to a premises which is also served by Ergon Energy Retail.</p> <p>However, in South East Queensland, where the distributor is not the RPO and the customer switches their retailer there may be situations where the new retailer is not aware of the life support requirements if the previous retailer was the RPO. A similar situation can occur when a retailer that is not the financially responsible market participant adds life support to a customer’s record and the customer does not follow through with the transfer.</p>
<p>4. Do stakeholders think there are any risks that customers may be incorrectly deregistered with switching or moving? What processes are in place to reduce any risks?</p>	<p>Energy Queensland acknowledges that if a customer does not notify the new retailer that they have life support equipment when switching or at any other time, there is a risk that the customer will not receive the protections afforded to registered life support customers and could be deregistered. The NERR includes a process for deregistration of life support customers by the customer’s retailer if medical confirmation is not provided or by the outgoing retailer upon churn. Deregistration under these circumstances is in accordance with the NERR and is not incorrect.</p> <p>Retailers are not currently obliged to ask a customer if life support equipment is required when a customer is switching</p>

	<p>or moving. Life support will only be registered when the customer provides notification of the requirement. Energy Queensland does not consider it unreasonable to expect that customers should inform their retailer of their life support needs.</p>
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CHAPTER 5 – SECTION 5.3 – PROPOSED SOLUTIONS

<p>1. What are stakeholder views on sharing of medical confirmation forms between businesses as proposed by EWON? Would this solution address the issue raised by EWON?</p>	<p>Energy Queensland supports the intent of EWON’s rule change proposal to make engagement in the energy market easier for life support customers. However, we are concerned by several aspects of the proposal which relate to the sharing of medical confirmation forms, including:</p> <ul style="list-style-type: none"> • Not all customers registered as requiring life support protections have provided medical confirmation forms that could be shared between retailers (refer to section 2 of this submission). • The medical confirmation contains sensitive health information about the customer and participants would be required to safeguard that information and minimise the risk of inadvertent transfer to an incorrect recipient (in accordance with the <i>Privacy Act 1988</i>). • The current B2B platform for market transactions does not facilitate the transfer of documents. To enable this facility, the existing B2B platform would require modification. While an alternative approach could be developed to enable the transfer of files between parties (e.g. via email), such a solution would be costly to administer and have greater potential for inadvertent transfer of sensitive health information to an incorrect recipient. • During the retailer switching process the related B2B market transactions do not include customer details. As such, there is no mechanism for either party to confirm the details of the switching customer. • A shift in roles and responsibilities could potentially lead to inadvertent deregistration and a further growth in invalid registrations and out-of-date life support registers.
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<p>2. What are the costs and benefits of the solution proposed by EWON?</p>	<p>Energy Queensland notes that the rule change proposal does not include a quantitative assessment of the costs and benefits which may accrue to various parties. While it is likely to be difficult to estimate potential costs, a cost-benefit assessment would be a useful tool to determine whether the benefits of the proposal are likely to outweigh the potential costs.</p> <p>It is likely that costs that would be incurred by participants in implementing the proposed solution would vary, depending upon whether the transfer of medical confirmation documentation is processed manually (likely lower cost, but less secure) or whether system adjustments are required to automate transfer of the documentation (likely greater cost, but more secure).</p> <p>Benefits may potentially include:</p> <ul style="list-style-type: none"> • greater retail market switching activity among life support customers; • improved customer experience during retailer switching for life support customers; • reduced time and financial burden for the customer to obtain new medical confirmation; and • avoided costs for retailers in reminding customers to obtain medical confirmation.
<p>3. What life support information should be shared between businesses as part of EWON's solution? How could this information be most efficiently shared?</p>	<p>As already noted above, while Energy Queensland supports the intent of EWON's proposal, we do not support the proposed solution.</p>
<p>4. What are stakeholder views on the two alternative pathways proposed by EWON? Would these address the issue raised by EWON?</p>	<p>Energy Queensland would support working with industry colleagues to develop an alternative approach to streamlining the transfer of medical confirmation information.</p> <p>As already noted, we support in principle the introduction of a standard medical confirmation form that can be accepted by all participants. This would be an efficient and cost-effective solution to enable customers to resubmit the same medical confirmation form when moving or switching, thereby avoiding the inconvenience and costs associated with obtaining a new medical confirmation.</p>

5. Are there additional solutions that the Commission should consider to in order to address the issue?	Energy Queensland has not identified any alternative solutions but would welcome the opportunity to work with industry colleagues to develop an alternative approach.
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CHAPTER 5 – SECTION 5.4 – IMPLEMENTATION

1. What are the system and policy changes required for each of EWON's proposed solutions to be implemented? What are the potential costs and benefits of these changes?	<p>To automate the transfer of medical confirmation, system changes will be required to enable medical confirmation forms to be attached to B2B communications. However, lower costs would be incurred if medical confirmation was transferred between participants via email.</p> <p>Policy changes would likely be required to obtain the customer's explicit informed consent to share the medical confirmation information with other participants to ensure compliance with privacy legislation.</p>
2. What are the potential privacy issues related to EWON's proposed solution? How could those privacy issues be overcome?	As already noted, there may be issues associated with maintaining the security of life support customer's personal health information. As also noted, Energy Queensland does not support the proposed solution.
3. What are stakeholder views on the compatibility of forms currently used by retailers and distributors between other retailers and distributors ? Would these forms be mutually acceptable to businesses?	Energy Queensland considers that medical confirmation forms that comply with the information requirements under subrule 124(6)(iii) of the NERR should be mutually acceptable to all participants.
4. Are there any other issues the Commission should consider in relation to sharing life support information?	<p>Issues for further consideration include:</p> <ul style="list-style-type: none"> • Transfers are completed entirely via the market, with the outgoing retailer receiving a B2B communication confirming the transfer once completed. When the transfer is completed, the new retailer's details are updated in the system to "unknown". Therefore, the only way for participants to identify the new retailer in order to facilitate the transfer of the medical confirmation would be to locate the relevant communication and identify the sender. This would

	<p>result in an onerous administrative process and potentially circumvents the recent customer switching rule change.</p> <ul style="list-style-type: none"> • It has been found that on some occasions, retailers do not submit the transfer request prior to the end of the cooling off period. If the proposed rule change is implemented, this issue could lead to a retailer sending medical confirmation to the retailer who has submitted a transfer, but the customer breaks the contract before the end of the cooling off period, resulting in sensitive health information being disclosed to a retailer who is not the financially responsible market participant. • Further consideration must also be provided to the situation where a customer switches retailer and the outgoing retailer is not provided with details of the customer who has established a retail account with the new retailer. In this situation, there is a significant risk that the life support applicant is not the account holder for the new retailer and sensitive information may inadvertently be disclosed.
<p>5. Should medical confirmation provided to the RPO "expire" after a certain period? What are the costs and benefits of this approach, particularly if new medical confirmation was not required when a customer changes premise or retailer?</p>	<p>Energy Queensland considers there would be value in requiring medical confirmation to be renewed / reconfirmed by all customers (including legacy life support customers) after an appropriate period of time, particularly if a standard medical confirmation form that is accepted by all participants is introduced.</p> <p>Cost include:</p> <ul style="list-style-type: none"> • costs incurred by the customer to obtain and resubmit a new medical confirmation periodically; and • costs incurred by participants to implement system and process changes to capture an expiry date to commence contact with the customer prior to expiry. <p>However, there would be benefits for participants in including an expiry date with respect to ensuring the ongoing validity of life support registrations and the accuracy of life support registers, thereby minimising administrative and operational costs associated with providing life support protections (which flow on to all customers). It would also benefit customers as protections would not be eroded by customers who do not genuinely need them.</p>