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Australian Energy Market Commission
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Email: aemc@aemc.gov.au

AEMC Ref: ERC0038

Maintaining life support customer registration when switching, Draft rule determination Paper

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (**MEA Group**) thanks the Australian Energy Market Commission (the **AEMC**) for the opportunity to provide comments in response to the AEMC's Maintaining life support customer registration when switching, Draft rule determination Paper (the **Paper**).

Background on the MEA Group

MEA Group is a vertically integrated generator and retailer focused entirely on renewable generation. We opened our portfolio of generation assets with the Mt Millar Wind Farm in South Australia, followed by the Mt Mercer Wind Farm in Victoria. In early 2018 we acquired the Hume, Burrinjuck and Keepit hydroelectric power stations, further expanding our modes of generation.

Maintaining life support customer registration when switching

MEA Group supports the AEMC's more preferable draft rule, allowing life support customers to continue to provide existing medical confirmation form (MCF) or other medical confirmation documents to a prospective retailer. MEA Group agree that this is a welcome improvement to the life support process and will benefit consumers. The more preferable rule has the added benefit of reducing implementation costs and regulatory complexity for registration process owners (RPO), when compared with the initial proposed rule change.

MEA Group agree that 4 years is a reasonable timeframe for the validity of documents relating to medical confirmation. Furthermore, MEA Group are supportive of the draft rule requiring the outgoing RPO to maintain a record of the medical confirmation form/document while the life support customer remains a customer, and for 110 business days from the date the life support customer ceases to obtain services from an RPO.

The MEA Group would also request that the AEMC consider the challenges that incoming RPOs may face when dealing with an outgoing RPO's medical confirmation document or form. While MEA Group agree that the requirement for legibility is an important consideration in the acceptance of medical confirmation, it is unclear in the drafting whether RPOs could reject another RPO's medical confirmation form for reasons other than legibility.

MEA Group consider that it should not be incumbent upon the incoming RPO to accept another RPO's medical confirmation that is deficient in any way. For example, a form that does not include details of the type of equipment required by the customer.

Notwithstanding the above clarification, this more preferable rule applies a common-sense approach to an otherwise complicated industry process. The draft rule is likely to have the effect of reducing both time and

costs for life support customers, allowing this more vulnerable segment of energy consumers greater access to the retail energy market.

If you would like to discuss any aspect of this submission, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Ell', written in a cursive style.

James Ell
Head of Compliance and Regulatory
Meridian Energy Australia
Powershop Australia Pty Ltd