

11 January 2021

Mr Conrad Guimaraes
Australian Energy Market Commission
Level 15, 60 Castlereagh St
Sydney NSW 2000

Submitted online: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Mr Guimaraes

RE: The Draft National Energy Retail Amendment (Maintaining life support customer registration when switching) Rule 2020

Thank-you for the opportunity to provide a submission in response to the AEMC's Draft Determination of National Energy Retail Amendment (Maintaining life support customer registration when switching) Rule 2020.

Momentum Energy Pty Ltd (Momentum) is an Australian operated energy retailer, owned wholly by Hydro Tasmania, Australia's largest producer of renewable energy. We pride ourselves on providing competitive pricing, innovation and outstanding customer service to electricity consumers in Victoria, New South Wales, South Australia, Queensland, the ACT and on the Bass Strait Islands. We also retail natural gas to Victorian customers. We offer competitive rates to both residential and business customers along with a range of innovative energy products and services.

Viability of Proposed Rule Change

All consumers of retail energy ought to have access to the benefits of the industry's competitive market. This should certainly include consumers requiring life support equipment, whose increased reliance on energy should not render them less entitled to those benefits. If it were evident that the unencumbered market was in fact hindering life support consumers' ability to participate in the competitive market, Momentum asserts that an appropriate response would indeed be to amend the National Energy Retail Rules.

However, neither the Proponent (the Energy and Water Ombudsmen of New South Wales) nor the AEMC has evidenced to stakeholders that customers who are dependent on life support equipment face any additional barriers to switching energy retailers compared to customers who do not have such a dependency. Momentum believes that in the absence of such evidence, any proposed change cannot satisfy the National Energy Retail Objective.

This is due to the fact the AEMC is positing a solution to a problem which has not been demonstrated to exist.

We suggest that the AEMC seek evidential data from the Proponent to determine the basis for the proposed rule change. This evidence ought to be presented to stakeholders before the AEMC reaches a Final Decision, so that the viability of the proposed rule change can be properly considered by all.

Implementation of Proposed Rule Change

In the event that the AEMC does discern an evidential need for this rule change, Momentum has only one material issue with the approach outlined in the AEMC's Draft Rule Determination (5 November 2020). Namely, we are concerned that the implementation time outlined is unachievable.

Momentum submits that an appropriate implementation window would be at least three months. We acknowledge that the proposed rule change is not technically complex and does not require significant lead times for the development of systems solutions. However, the proposed implementation time does not appreciate the training requirements and correspondence and process changes involved. With a Final Decision currently expected on 25 February 2021, and a commencement date of 4 March 2021, retailers will have just 5 business days to effect the required changes. Momentum asserts that such a reduced timeframe seems wholly unnecessary. As previously stated, the AEMC has failed to demonstrate the need for this rule change at all, let alone the requirement for such an urgent implementation.

Should you require any further information regarding this submission, please don't hesitate to contact me on 0478 401 097 or email randall.brown@momentum.com.au.

Yours sincerely

[Signed]

Randall Brown
Regulatory Manager