

14 January 2021

Ms Merryn York
Acting Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

Lodged via the AEMC's website

Dear Ms York,

Re: Maintaining life support customer registration when switching (RRC0038) – Draft determination

Simply Energy welcomes the opportunity to provide feedback on the draft determination for the maintaining life support customer registration when switching rule change.

Simply Energy is a leading energy retailer with over 730,000 customer accounts across Victoria, New South Wales, South Australia, Queensland and Western Australia. As a consumer-centric retailer, Simply Energy supports improvements in protections for life support customers across all jurisdictions.

Simply Energy supports the Australian Energy Market Commission's (Commission) more preferable draft rule, which addresses concerns raised in stakeholder feedback to the consultation paper. Simply Energy's submission provides specific feedback on the implementation date of the rule change and other issues related to life support.

The Commission's more preferable draft rule

In response to the consultation paper, Simply Energy urged against any rule change that required direct retailer-to-retailer sharing of sensitive life support customer information due to privacy risks. Simply Energy is pleased that the Commission's draft rule has addressed this issue.

The Commission's proposed solution in the draft rule would have lower implementation and ongoing costs than the solution proposed by the Energy and Water Ombudsman of New South Wales in the rule change request. This is appropriate because the benefits that may arise from the rule change are not yet clear. Simply Energy does not consider that life support medical confirmation resubmission is a barrier to customers switching energy retailers as customers currently have adequate time to send through medical confirmation to their new retailer after completing a transfer.

While Simply Energy is supportive of the draft rule, the proposed commencement date of 4 March 2021 is concerning. Following the publication of the Commission's final determination, Simply Energy will need to commence the redesign of several existing processes (including call centre scripts, work instructions, staff training and customer communications). Simply Energy will also require some system validation changes arising from this rule change, to enable the medical letter retrieval and its provisioning to the customer. As such, Simply Energy expects and recommends at least six months implementation timeframe from the date of the final determination. This would

enable Simply Energy to update its internal processes and ensure it will be compliant with the new rule once it commences.

Other issues related to life support

Simply Energy understands that the Commission is focused on reducing barriers to retail competition for life support customers during this rule change process. Following the final determination on this rule change, Simply Energy would support the Commission progressing either a holistic review of the life support framework or a consolidated rule change process.

Simply Energy has previously raised several issues with the current life support framework, such as inconsistent processes and outcomes across different jurisdictions of the National Electricity Market. Simply Energy is considering making a rule change request that would seek to improve the efficiency of aspects of the current life support rules.

Concluding remarks

In closing, Simply Energy supports the Commission's draft rule but would find it challenging to meet the proposed commencement date of 4 March 2021. Simply Energy is very supportive of a holistic review of the life support framework to ensure that the framework is providing the best long-term outcomes for life support customers.

Simply Energy welcomes further discussion in relation to this submission and future reviews of the life support framework. To arrange a discussion or if you have any questions please contact Matthew Giampiccolo, Senior Regulatory Adviser, at matthew.giampiccolo@simplyenergy.com.au.

Yours sincerely

A handwritten signature in black ink that reads "James Barton". The signature is written in a cursive, slightly slanted style.

James Barton
General Manager, Regulation
Simply Energy