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Essential Services Commission
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Review of Energy Retail Code of Practice – Issues Paper

CitiPower, Powercor and United Energy (the networks) welcome the opportunity to provide feedback on the Essential Services Commission (ESC) Review of Energy Retail Code of Practice – Issues Paper (Issues Paper). We appreciate the ESC initiating this comprehensive review of the current framework and consideration of potential improvements.

We support the intention to strengthen the regulatory framework to protect customers experiencing vulnerable customers. The Issues Paper highlights the key challenges and potential harms for the customers experiencing payment difficulty or vulnerability. Through our reset engagement program, our networks have conducted extensive engagement with both end use customers and customer experiencing vulnerability. Throughout that process customers have expressed to us frustration with their experiences with energy sector in general. Many fear this will become worse through the energy transition. As a result, our draft regulatory proposals will include a customer package which we are developing with our Customer Advisory Panel. If the ESCV is interested, we would welcome an opportunity to discuss what we have heard from customers or what we are including as part of our customer package.

Specifically for this submission, we would like to draw attention to the challenges experienced by retailers and networks related to the life-support customers. Our real-life experience with life support customers through both planned and unplanned outages has provided insights into ways we believe retailers could enhance their processes and systems to improve the life-support customer's journey and better ensure their care and safety.

Life support customer register

Networks such as us, face challenges in maintaining accurate and current life support registers due to the current shared responsibility model. Shared responsibility has resulted in information gaps, particularly where customers transition between retailers. The cause is primarily the absence of a robust follow-up process. The accuracy of network life support registers are crucial if the prioritisation and protection of life support customers is to be paramount during outages.

Based on our records, approximately 98 per cent of life support registrations are completed through retailers. This highlights the critical role retailers play as the initial interaction point. The current process does not consistently require customers to provide medical confirmation. This has resulted in exponential growth in the number of not-medically confirmed registrations. This exponential growth in life support customers registration has increasingly impacted our ability to prioritise genuine, medically confirmed life support customers potentially threatening their wellbeing.

We rely exclusively on retailers for all customer-related information and data, including life support registration and deregistration. Retailers have multiple opportunities to confirm a customer's life support

status. Networks have fewer opportunities, usually only in cases of faults, outages, and some general meter-related inquiries.

Therefore, we propose the following key changes to “Part 8 Life Support Equipment” of the Energy Retail Code of Practice:

1. **Mandate medical certificate submission:** the registration owner must ensure that customers provide medical certificates within a specified period, supported by a robust follow-up process.
2. **Retailers to confirm life-support status every four years:** retailers must follow up with customers to confirm their life support status every four years similar to that applied in New South Wales (NSW). In NSW, for the NSW Government Life Support Rebate, life support customers are required to re-submit their medical paperwork, including a doctor’s certificate, every four years to continue receiving the rebate. Consequently, retailers have a dedicated follow-up process exclusively for NSW customers. This requirement does not apply to customers ineligible for the rebate. The follow-up process includes two reminders are provided one month apart, followed by a final warning letter threatening deregistration if the customer does not provide a medical certificate. The exception would be a customer who has a permanent need verified by medical paperwork.
3. **Mandate de-registration:** a robust deregistration process must be mandated to ensure life support registers are accurately maintained in the absence of medical confirmation or when there are changes in customer scenarios, such as moving out.
 - **Change of address:** retailers should inform customers at the time of organising their move out or on their bills that if they are life support customers, they will be deregistered at the time of change of address. This will prompt customers to register themselves at their new residence.
 - **Non-medically confirmed:** in the absence of medical confirmation, retailers must deregister the customers and notify the relevant network.
4. **Periodic audits:** given that customer information and data is held by the retailers, on which networks rely, there should be a monthly reconciliation process established managed by retailers to ensure networks have the most current information.

These changes to the Energy Retail Code of Practice we believe would enhance the accuracy and reliability of life support registers. This will provide better protection for life support customers during outages. By creating greater responsibilities on retailers, and mandating robust follow-up processes, we can achieve better systems and processes that more adequately protect customers in life support situations.

Should you have further queries or require clarification on this proposal, please contact Zahra Crocker, Manager Regulatory Projects on [REDACTED] or at [REDACTED].

Yours sincerely,

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