

16 September 2019

Life Support Review
Essential Service Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000

By email: energylifesupport@esc.vic.gov.au.

Submission – Strengthening protections for life support customers 2019

Thank you for the opportunity to provide a submission in response to the draft decision, *strengthening protections for life support customers*.

Momentum Energy is a 100% Australian-owned and operated energy retailer. We pride ourselves on competitive pricing, innovation and outstanding customer service. We retail electricity in Victoria, New South Wales, South Australia, Queensland, the ACT, and on the Bass Strait Islands. We offer competitive rates to both residential and business customers along with a range of innovative energy products and services. We also retail natural gas to Victorian customers.

Momentum Energy is owned by Hydro Tasmania, Australia's largest producer of renewable energy.

Introduction

Momentum welcomes the latest draft of the proposed amendments to the life support obligations in the Energy Retail Code. We support the move to align with the National Energy Retail Rules and we agree that processes, communication and obligations between all parties need to be established and defined to ensure life support customers have qualified legal protections. Momentum applauds the approach and dedicated time the ESC has taken to review the existing obligations contained within the Energy Retail Code.

We also agree that life support is a critical and sensitive matter that needs a clear process to be implemented however, we have some comments in relation to the additional obligations proposed by the ESC, which we have outlined below.

Draft Decision 21 - Medical certificates can be used as medical confirmation

Momentum has concerns regarding the procedure for which the customer can provide a medical certificate as medical confirmation. In order to receive the Life Support concession rebate, customers are required to provide the Life Support Concession Form as prescribed by DHHS. This means that this obligation will create additional hassle for customers by requiring the completion of two separate processes before they can gain the full protections that the scheme is designed to provide. We are concerned that customers who may submit a medical certificate in place of a medical confirmation form will still be required to provide such a form to be eligible for relevant concessions.

We would also like to draw the ESC to the attention of the initial drivers for the national change to the life support process. In addition to the need for increased certainty for consumers who require life support, the AER raises concerns that life support registers have grown and have become increasingly

inaccurate.¹ Whilst we support the proposed changes which establish clear responsibilities and obligations of energy businesses, we urge the ESC to reconsider the use of medical certificate in place of medical confirmation. Whilst we understand the severity and importance of life support, we note that there are many medical conditions which may emphasise on the importance of supply however, may not exactly qualify as life support as intended in the Energy Retail Code.

We propose that the ESC to adopt the AER's approach to the medical confirmation process in the national framework to support a balance between customer protections and the integrity of the life support process to promote the accuracy of the registers.

If you require any further information with regard to these issues, please contact me via email at Tina.bui@momentum.com.au.

Yours sincerely

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Momentum Energy

¹ AEMC 2017, *Strengthening protections for customers requiring life support equipment, Consultation paper*, 20 June 2017, Sydney, 5.