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Strengthening protections for life support customers – Draft decision, 15 August 2019

Jemena Electricity Networks Vic Ltd (**Jemena**) welcomes the opportunity to respond to the Essential Services Commission's (the **Commission**) draft decisions on strengthening protections for life support customers.

Jemena supports all of the draft decisions as they provide better protections for energy consumers on life support and further clarify our support to draft decisions 9, 12 and 16, which are set out below.

Draft decision 9

We believe adopting clause 90(1)(c) of the National Energy Retail Rules (**NERR**) in isolation would not be practical. Clause 90 (1)(c) provides an opportunity for a life support customer to bring forward the specified date of a planned interruption. This would only be possible where planned works do not impact any other customers. Such activities typically include routine meter testing and replacement, affecting a single customer.

For planned maintenance, repair or augmentation works on the distribution system; we typically notify about 50-100 customers. In these instances, it will not be practical to bring forward the specified date of a planned interruption for a life support customer as a shorter timeframe may not be workable to the other customers, particularly if some of those customers are life-support customers themselves. In these circumstances we notify customers of planned interrupting giving them at least four business days' notice.

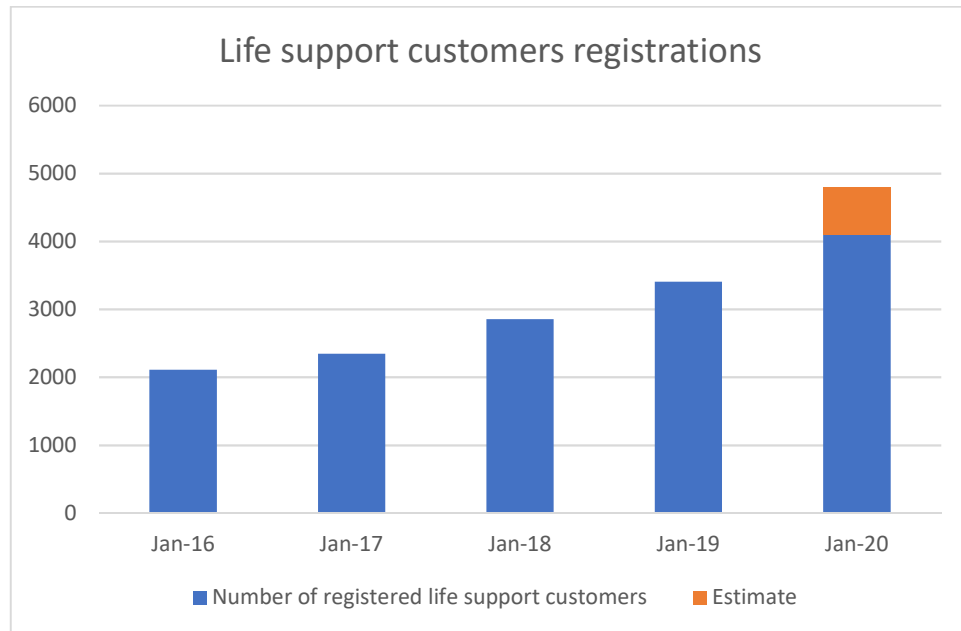
We believe clause 90 as a whole is better than the current clause 5.5.1 of the Electricity Distribution Code (**Code**) as it also allows distributors, with the explicit consent of the customer, to arrange for an interruption on any day within a date range of 5 business days or a specific date *for non-life support* customers.

Draft decision 12

We support the Commission's decision to align with the NERR in relation to how energy businesses seek medical certification from life support customers, but *do not support* the Commission's considerations on doing away with the requirement to seek

medical confirmation from a registered medical practitioner – that is, “taking customers at their word that they require life support equipment”.¹

The chart below shows the increase of life support customers in Jemena’s distribution area.



We observe the year on year growth of customer with life support is disproportionate with customer growth on the network, there appears to be a trend caused by unknown factors and this trend could accelerate if medical practitioner certification is removed. To have a robust process to manage the life support register, we support retention of the obligation on life support customers to provide medical confirmation from a registered medical practitioner.

An increase in registration of life support customer registrations has a flow-on effect on distributors when planning outages for new connections, maintenances, repair and augmentations of the distribution system.

We support the NERR medical confirmation process, which requires life support customers to provide confirmation from a registered medical practitioner.

Draft decision 16

Jemena supports this new obligation, in addition to those in the NERR, which requires retailers and exempt sellers to verify whether the customers have life support equipment at the time of renewing or first entering into a contract.

Currently, our practice is to continue the life support registration status at a supply address unless advised otherwise by the customer’s electricity retailer. This new obligation would enhance the accuracy of life support registers more generally.

¹ ESC, *Strengthening protections for life support customers, Draft decision*. 15 August 2019, Pg. 29.

The Commission is seeking stakeholder's view on whether it is still necessary to allow distributors to de-register some life support customers, given the additional new obligation on retailers.

We believe there is value in retaining the right of distributors to de-register the life-support status for customers as we may still encounter customers who have not notified their retailer that they are not a life support customer. We are likely to come across these customers during our interactions in performing our obligations in the Code – namely, annual notices to customers under clauses 5.6.1 (c) and 9.1.2A; planned interruption notifications and connection related matters. We believe, the distributor's right to de-register in the NERR should be reflected in the Code.

After the Commission has made its decisions on the Code review, Jemena requests an opportunity to review the changes, as well as being afforded an opportunity to comment on the drafting, to reduce the interpretation risk.

If you require further information in relation to the submission, please contact Siva Moorthy on (03) 9173 8774 or at siva.moorthy@jemena.com.au.

Yours sincerely

[signed]

Matthew Serpell
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