



18 November 2011

General Manager
Retail Markets Branch
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Via email to: AERInquiry@aer.gov.au

Dear General Manager

Comments on Exempt Selling Guideline amendments

COTA Australia welcomes the opportunity to provide further comment on the Exempt Selling Guideline (the Guideline). COTA has previously provided input to the Draft Guideline with particular reference to older people who are exempt customers of energy.

As noted in its submission to the Draft Guideline, COTA's key concern is for the growing number of older people living in retirement villages, residential parks and other exempt networks. COTA is pleased that its concerns have been recognised by the AER and that changes are proposed to bring protections for exempt customers into closer alignment with those for retail customers. For this reason COTA supports the changes outlined in October Consultation Paper.

However COTA notes concerns raised by the Energy Division, South Australian Department for Transport, Energy and Infrastructure, in its submission to the Draft Guideline. It noted that r116(1) and r120(1) of the National Energy Retail Rules (NERR) forbid the disconnection of customers for non-payment during a defined extreme weather event. COTA is concerned that extreme weather events – particularly heatwaves – can have significant health impacts on older people and that exempt customers should receive the same protections as retail customers in this regard.

Notwithstanding the issue of disconnections during extreme weather events, COTA supports the AER's decision to re-examine the Guideline and to improve the protections it provides to exempt customers.

If you have any questions regarding this submission, please contact Tom Stead, Senior Policy Adviser, COTA SA, on (08) 8224 5515 or email tstead@cotasa.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ian Yates', written over a large, light-colored scribble or background mark.

Ian Yates AM
Chief Executive