

Essential Services Commission
Level 8/570 Bourke St
Melbourne VIC 3000

Submitted via Engage Victoria

4 September 2025

Dear Commissioners,

Better protections for life support customers in Victoria

The Australian Energy Council (AEC) welcomes the opportunity to provide input to the ESC's review of life support protections. Please find our submission below, which was originally prepared for the AEMC's life support rule change consultation.

While this submission was prepared for the AEMC, the AEC encourages alignment between the outcomes of the AEMC and ESC life support rule change processes. Harmonising the resulting rules and obligations will promote consistent best practice across jurisdictions, streamline industry requirements, and enhance protections for customers reliant on life support equipment.

We appreciate the ESC's consideration of these points and look forward to engaging further to support the delivery of safe and effective life support protections.

Any questions about this submission should be addressed to Braeden Keen by email to braeden.keen@energycouncil.com.au.

Yours sincerely,

Braeden Keen
Policy Advisor

Improving life support processes

The Australian Energy Council ('AEC') welcomes the opportunity to make a submission in response to the Australian Energy Market Commission's ('AEMC') *Improving life support processes* consultation paper ('Paper').

The AEC is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. AEC members generate and sell energy to over 10 million homes and businesses and are major investors in renewable energy generation. The AEC supports reaching net-zero by 2050 as well as a 55 per cent emissions reduction target by 2035 and is committed to delivering the energy transition for the benefit of consumers.

The AEC supports improving life support processes, recognising the critical importance of reliable protections for customers who depend on life support equipment. The existing mechanisms to protect these customers can and should be strengthened. We believe that this consultation provides an important opportunity to enhance current practices and deliver better, more consistent outcomes for customers across the market.

We do, however, note that the proposed rule change, particularly the proposed introduction of two distinct levels of life support, will require significant system development and operational adjustments. This will have flow-on impacts across the B2B framework, including how information is exchanged between retailers and distributors. In addition, there will likely be material costs involved in building out these B2B transactions and integrating them into retailer systems. The AEC supports reforms that deliver tangible benefits for life support customers, and we encourage implementation pathways that balance those benefits with the costs and complexity involved in system changes.

On this basis, the AEC recommends that a minimum period of nine months is required for B2B processes to be updated and tested post the final rule, with an additional nine months needed for retailer system implementation. Recognising the significant program of reforms currently being implemented across the energy market, such sufficient lead time is critical. This will minimise the risk of any implementation issues and ensure that the intended benefits for life support customers are delivered in practice.

Additionally, the AEC encourages the AEMC and ESC to work closely to align the outcomes of the current life support rule change process. As these reforms are consulted on by both regulators, we want to ensure that the resulting rules and obligations are closely harmonised to ensure consistent best practice across both jurisdictions.

The AEC offers the following considerations regarding some additional issues below:

Issue	AEC Views
Re-registration Cycles	<ul style="list-style-type: none">The paper seeks to introduce a four-year re-registration cycle for life support customers, with deregistration if updated medical confirmation is not received. The AEC supports ensuring registers are accurate and effective but highlights the need to balance safety with workability. We encourage the AEMC to consider options such as permanent confirmation for

	ongoing conditions, staged transitions for legacy customers, and safeguards to prevent inadvertent deregistration and loss of protections.
<i>Proposed amendments to civil penalty provisions</i>	<ul style="list-style-type: none"> The AEC believes that proportional civil penalties proposed by the paper would be appropriate.
<i>Medical Confirmation Form</i>	<ul style="list-style-type: none"> The AEC is supportive of a standard medical template form. However, we have some considerations for the proposed template. For instance: <ul style="list-style-type: none"> The proponent suggested that the AER would be responsible for the ownership and periodic reviews of both outlined templates in collaboration with industry and relevant stakeholders. However, the paper does not clarify if this is to be the case besides publication on their website. We suggest that there is clear ownership as required for regular updates. The form lacks guidance for medical practitioners, particularly on the distinction between critical and assistive. There are no controls for the 'other' category, which can be misused with claims for equipment that have little relation to life support. There is a need for a mandatory justification for 'other' with practitioner explanation and sign off. The inclusion of a question around life support concession information in the 'medical practitioner' section should be excluded. Its inclusion will create unnecessary confusion. We suggest this information ought to be provided by the party accepting registration.
<i>Status of gas in the life support framework</i>	<ul style="list-style-type: none"> While there is no gas life support equipment included within the life support equipment definition, customers are presently able to register against either fuel. We consider transitioning gas out of the framework to be the most appropriate long-term approach. However, we acknowledge some customers still rely on gas for purposes such as heat and humidification, and therefore support retaining gas in the definitions for now, with

	<p>a view to revisiting its removal as electrification progresses. Considerations include:</p> <ul style="list-style-type: none"> - In the life support frameworks of other jurisdictions, such as WA, gas accounts are excluded from life support obligations. - It is difficult to assign a single process owner across both electricity and gas if the customer has registered again in either category.
<i>Central database for storing medical confirmations</i>	<ul style="list-style-type: none"> • While the AEC acknowledges this is out of scope during this rule change process, we believe a national database to store medical confirmations would be the most viable long-term solution to improving information-sharing among businesses. We acknowledge implementation would be complex, requiring significant investment, changes to existing B2B processes, and careful management of frequently updated life support data to avoid customers falling through the cracks. Nonetheless, we would encourage the AEMC to recommend the progression of this issue as part of this rule change process.
<i>Discretion to remove life support flag on move out/meter abolishment</i>	<ul style="list-style-type: none"> • The AEC believes there is an opportunity to harmonise the remove of life support flag timeframes when a customer is moving out with current Victorian practice. The present NECF process requires a notification and 15 business days to deregister, which creates unnecessary holdup for customers needing critical site works or disconnection.

Overall, this is a complex and highly operational reform where the detail of implementation will be crucial to its success. We encourage the AEMC to continue to provide adequate consultation time and opportunities for industry and subject matter experts to work through the practical issues as the rule change progresses. We acknowledge the consultative approach taken to date and look forward to continuing to closely engage with the AEMC in this process.