

Improving life support processes

We have published a consultation paper seeking your feedback

The Australian Energy Market Commission (AEMC) has published a consultation paper in response to a rule change request from South Australian Power Networks and Essential Energy (the proponents). The request seeks to amend the National Energy Retail Rules (NERR) to improve the existing processes of retailers and distributors in registering and serving customers that require life support equipment at their premises.

We are seeking your feedback on the issues and proposed solutions identified in the rule change request, including:

- the scale of the problems identified by the proponent
- the characterisation of the proposed issues and considerations we need to take into account for each proposed solution
- whether the proposed solutions best address the issues raised in the rule change requests
- if the proposed changes will best promote the long-term interests of consumers
- implementation considerations, including the costs of any such changes.

The rule change request seeks to improve outcomes for life support customers by amending definitions and processes

The rule change request stems from the Energy Charter's #BetterTogether Life Support Customer initiative. This consultation process was carried out over two years. The findings of this work have led the proponents to suggest that:

- retailers and DNSPs can not readily identify life support customers using life-sustaining equipment (i.e. those with more critical needs) compared to those that rely on life support equipment to improve the quality of life
- life support registers are inaccurate because of unclear processes and responsibilities
- communications with life support customers often do not happen according to customer preferences.

The rules regarding life support are set out in Part 7 of the NERR, with guidance for retailers and distributors outlined in the AER's Life Support Registration Guideline.¹

We have grouped the extensive set of issues and associated proposed solutions into three themes

The rule change request identifies 10 issues and related solutions, which we have grouped into three themes:

1. Improving definitions of life support customers to ensure resources are triaged to those most in need, and civil penalties align with potential harms.
2. Improving registration and deregistration processes by clarifying roles and directions. This is to ensure registers are accurate and up to date.
3. Improving communication methods to contact life support customers. This is to allow retailers and DNSPs to contact life support customers faster and via the customer's preferred method.

¹ AER, [AER Life support registration guide 2021](#), September 2021.

Table 1: Issues identified in the rule change request

THEMES	ISSUE
Improving definitions to better target life support customers and related civil penalties for breaches	Issue 1: Retailers and DNSPs cannot distinguish between, or effectively triage, customers with critical needs
	Issue 2: Civil penalty provisions are not aligned to the potential harm caused
Improving registration and deregistration processes	Issue 3: There is confusion around who may deregister a premise when there is a change in the customer's circumstances
	Issue 4: The NERR does not require up-to-date medical confirmation for all registered premises and permanent medical conditions cannot be identified
	Issue 5: Life support registration can be misused to avoid disconnection
	Issue 6: There is an inconsistency in how life support is assessed, and back-up planning is lacking
Improving communication methods to contact life support customers	Issue 7: A second person can not be contacted about planned outages
	Issue 8: Electronic contact details are not always captured for life support customers
	Issue 9: There is confusion around permitted written communication methods
	Issue 10: There is no central database for storing medical confirmations

This rule change request is focussed on process improvements and is not seeking to reduce protections to life support customers under the NERR.

The rule change request aligns with our vision for a [consumer focused net zero energy system](#), which seeks to inform, empower and protect consumers individually and as a collective.

We will use four criteria to assess the rule change request

We consider that there are four assessment criteria that are most relevant to this rule change request:

1. Outcomes for consumers. We will consider the impact of amending life support definitions, processes and communication arrangements on:
 - existing consumer protections, including interactions and potential redundancies
 - consumer behaviour
 - impacts on different types of consumers, including from an equity and vulnerability perspective.
2. Principles of market efficiency. We will consider the impact of changes to life support roles and responsibility, including the impact on the:
 - allocation of risks and costs between DNSPs, retailers and consumers, and other market participants, including medical practitioners
 - transparency of information and information-sharing around life support requirements
 - structural barriers to enabling all consumers to access benefits relating to energy.
3. Implementation considerations. We will consider key implementation considerations of the rule change, including:
 - costs of the proposed solutions to retailers, DNSPs, market bodies, jurisdictions and consumers, including new and
 - the interaction with existing processes
 - the impact on market bodies or jurisdictions, other parties including medical practitioners, and across different groups of consumers, including with changing

responsibilities.

4. Principles of good regulatory practice. We will consider principles of good regulatory practice including whether:
 - prescriptive or principles-based provisions in the NERR are in the long-term interests of consumers
 - setting clear rules and responsibilities to reach the intended outcome and would minimise costs to industry participants and support consumers.

Submissions are due by 4 September 2025 with other engagement opportunities to follow

Written submissions responding to this consultation paper must be lodged with the Commission by 4 September 2025 via the Commission's website, www.aemc.gov.au.

Our expected timeline for the rule change is provided below:



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