



Date: 4<sup>th</sup> September 2025

Submitted Online

## Consultation Paper – Improving Life Support Processes

Alinta Energy welcomes the opportunity to provide comment on the proposed rule change consultation paper – “Improving Life Support Processes.”

As an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3,000MW and more than 1.1 million electricity and gas customers Alinta Energy has a strong interest in opportunities to improve consumer experiences, and access to support schemes such as those provided under life support protections.

While we recognise the intent to improve consistency, data accuracy, and consumer protections, we hold significant concerns that the proposed changes may unintentionally undermine the objectives of safety, equity, and practicality in protecting vulnerable energy customers.

Our detailed comments are provided in the following sections. Should you have any questions or wish to discuss any aspect of our submission please contact Shaun Ruddy, Manager National Retail Regulation. (02) 9372-2653 or via email: [shaun.ruddy@alintaenergy.com.au](mailto:shaun.ruddy@alintaenergy.com.au)

Yours Sincerely

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# **Consultation Paper – Improving Life Support Processes**

## **Risk of Unintended Exclusion of Vulnerable Customers**

The proposed differentiation between “critical” and “assistive” life support equipment raises concern. The rigid application of definitions may result in the exclusion of customers who, while not using life support continuously or with critical equipment, still face genuine health risks during planned or unplanned outages.

The AEMC should consider a more inclusive framework that prioritises medical need and risk over strict equipment classifications. Vulnerability is not binary, and deregistering customers based on technicality may compromise safety.

## **Disproportionate Administrative and Operational Burden**

The proposed changes involve extensive process alterations, including:

- Re-certification of medical confirmation every four years (except for ‘permanent’ conditions),
- System changes across retailers and distributors,
- National awareness campaigns and staff retraining, and
- More complex registration and deregistration workflows.

These changes will require significant financial and human resources without demonstrable improvements in life support outcomes. Smaller retailers and distributors, in particular, may struggle to meet these requirements, leading to inconsistent implementation across jurisdictions.

## **Data Privacy and Consumer Consent Risks**

The collection and sharing of additional data, such as the contact details of secondary support persons, introduces new privacy risks. Given recent concerns around data breaches across industries, expanding sensitive data handling without sound safeguards may place vulnerable customers at additional risk.

Furthermore, there is insufficient clarity around how consumer consent will be obtained and maintained, particularly when sharing life support data across parties.

## **Complex Implementation Timeline and Risks of Transitional Gaps**

The implementation plan anticipates an 18-month transition period, which includes MSATS changes, the development of new templates, and a national communication campaign. However, the phased rollout could lead to inconsistency and confusion during the interim.

We are concerned that customers currently registered may be adversely impacted as new systems come online, particularly if the deregistration processes is accelerated under the new regime.

## **Limited Marginal Benefit Over Existing Framework**

It is unclear whether the proposed changes will materially improve customer outcomes beyond what is possible through targeted reforms within the existing life support framework.

Rather than a wholesale rule change, we believe greater benefit could be achieved by:

- Enhancing compliance enforcement under current rules,
- Improving customer and stakeholder education,
- Streamlining the current registration process, and
- Increasing coordination and data-sharing standards with existing privacy protections.

## **Recommendations**

We suggest the AEMC consider the following alternative approach:

1. Reassess the necessity of distinguishing between types of life support equipment and consider a more risk-based, clinician-led approach to determining eligibility.
2. Reevaluate the administrative impact and assess whether simpler alternatives exist.
3. Postpone or reconsider the mandatory sharing of personal information until a robust privacy framework is in place.
4. Pilot any major system or process changes in one jurisdiction before national rollout.
5. Undertake a regulatory impact assessment comparing the current rule's performance with the proposed changes.

## **Conclusion**

While we support efforts to improve accuracy and coordination in supporting life support customers, we urge the AEMC to reconsider whether this rule change is proportionate and necessary given the associated costs, risks, and limited additional benefit.

The safety of vulnerable customers is paramount however, reform must be pursued with care, equity, and practicality.

## **Detailed Operational Observations and Comments**

### **Deregistration Process.**

The deregistration process should be aligned with the Victorian processes, that is to allow for a shortened timeframe for deregistration where deregistration is requested by the customer. The current length of the deregistration process can have unintended consequences for other operational activities. For example, where a customer has requested a meter abolishment, and a lengthy delay occurs whilst waiting for the deregistration to be processed so that the abolishment can proceed.

### **Transition Plan for Legacy Customers**

Customers who have been registered for Life Support protections for more than four years may fall outside of new confirmation rules. A clear process is required to manage existing customers with "expired" confirmations that includes a staged transitional approach to avoid bulk deregistration's.

### **Incomplete Site Details**

Enforce minimum data standards for registration of life support protections. Sites can be registered by the relevant Distribution Network Provider, where key information, customer name and contact details have not been included. Sites should not be able to be registered without these details.

### **Clarification on Institutional Sites**

There is no clear guidance in any of the rules governing the application of Life Support protections that defines or excludes the application of protections to institutional organisations (hospitals, aged care facilities etc).

Whilst Clause 124(2) of the NERR references Life Support protections applying to a "premise" where a person resides, this may be interpreted in the broad sense to include institutional organisations.

Clarity needs to be provided to explicitly detail the application if any, of Life Support protections for institutional organisations. This also includes clarification where non-institutional / non-residential sites (small business and commercial premises) are seeking to claim Life Support protections.

### **Retailer Notification Upon Site Transfer – Life Support Continuity**

We acknowledge that updates to the B2B Procedures(v39) are in progress and support the structural change made to align with the proposed rule change. However key operational and integrity gaps remain.

When a site with Life Support changes retailers, there can be a delay in the distributor notifying the new retailer of the status of the site, being a Life Support site.

We have experienced cases where this notification is not received until site reconciliation has occurred, well after the site has been transferred.

As a result, the new retailer may be unaware of the site's Life Support status. Creating both a compliance and consumer protection risk for the Life Support customer.

We suggest that the introduction of a defined notification timeframe for Distributors to advise new retailers of a Life Support registered site during the site transfer process would ensure greater levels of consumer protection.

This could be achieved through the strengthening of B2B obligations and compliance expectations regarding Life Support Continuity, through the inclusion of system triggers or automatic alerts in MSATS/B2B to flag high risk accounts instantly upon transfer between retailers.

**Application Process.**

Improvements and simplification of application forms will improve application efficiencies. Customers should not be required to complete multiple forms so as to receive a Life Support rebate and to also receive Life Support protections. (refer NSW operational requirements)

To reduce the potential for fraud, to occur. A medical practitioner validation process could be introduced to ensure the legitimacy of the medical practitioner responsible for completing the Life Support form. Assuming that audit processes are not already in place where relevant authorities audit these forms.

We also assume that medical application forms will be updated to clearly articulate any difference between Critical and Assistive Life Support requirements.

In addition, guidance materials should be updated to explicitly state the eligible practitioners that are qualified / authorised to complete the application form so as to avoid any unnecessary confusion and administrative burden in correctly completing the Medical Conformation form.