

8/9/2025

Rudy Zverina  
Project Lead  
Australian Energy Market Commission

Dear Mr Zverina,

**Improving life support processes – Consultation paper [RRC0064]**

Energy Networks Australia (ENA) welcomes and appreciates the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper on Improving life support processes.<sup>1</sup>

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA is strongly supportive of the proposed rule change to provide clarity to life support processes and thereby improve outcomes for life support customers. It is important to ensure any changes only improve processes and do not create additional difficulty or confusion for life support customers or unnecessarily increase costs.

ENA would like to recognise the significant uplift needed in systems and costs as a consequence of the amendments in the rule change request. While costs may be significant, as life support numbers are expected to grow, investment in system uplift now provides long-term benefits to customers. The costs of not updating systems and investing in processes now is likely to be far greater, including financial, economic and social costs.

### Proposed definitions

ENA is strongly supportive of the proposed definitions for critical and assistive life support customers. The proposed definitions provide clarity to Distribution Network Service Providers (DNSP) on how best to prioritise customers in need of urgent support in outages, especially those disaster related, without sacrificing support for any life support customers. With forecasts suggesting the number of life support customers will grow, clarity is important for DNSPs to manage resources effectively during an outage.

ENA is not supportive of the proposed permanent confirmation for either critical or assistive life support. The potential benefits from permanent confirmation are small compared to the potential adverse outcomes. The proposed amendment for permanent confirmation also does not extend relevant protections, potentially creating gaps in obligations.

---

<sup>1</sup> AEMC, Improving life support processes, [Consultation paper](#), 31 July 2025.

It is not the customer directly who is registered, rather the premises at which the customer resides. The four yearly medical confirmation for life support customers creates a notification system to ensure the life support equipment is still required and checks whether the customer has a backup plan. Allowing premises to be permanently registered creates difficulties when customers move residences. Medical confirmation occurs infrequently enough that requesting documentation from customers would align with regular appointments and would not result in additional appointments or unnecessarily increase customers' appointment costs.

Obtaining and maintaining correct contact details to notify life support customers of planned outages is a significant issue for DNSPs. Permanent confirmation provides fewer opportunities for DNSPs to ensure contact details are correct. This could lead to difficulty in contacting customers prior to outages.

### Amendments to registration and deregistration processes

ENA believes the retailer is best placed to maintain the registration process, streamlining the process for customers. Retailers have a stronger direct relationship with customers, and networks have a stronger understanding of the premises. DNSPs currently manage very small proportions of registrations for life support customers. Customers are often required to contact retailers, regardless of who they first contact, to be eligible for life support related concessions.

The systems required to accept and maintain customer registrations are costly. Duplicating requirements for maintaining the registration processes between retailers and DNSPs increases costs for all customers. Retailers owning the registration process would simplify the process for customers and reduce costs.

ENA supports amendments to require upfront medical confirmation from the customer to register after two failed attempts. Costs to provide life support infrastructure and related processes are socialised among all customers, therefore, minimising the costs associated with these processes is in the best interests of all customers. Deregistration for no medical confirmation should only occur where there is no customer contact. Customers can request additional time or support in the registration process, ensuring deregistration does not occur for customers in need.

Up to date contact information is a significant issue for DNSPs. A second nominated contact for life support customers would support ensuring customers are notified and prepared for planned outages. For timely awareness of outages, DNSPs should not be obligated to notify the second nominated contact via letter. Instead, phone number or email contact details should be required for the second nominated contact. Where contact details change, the process should be simple and not require the same registration form to be completed.

ENA supports the proposal to amend the obligations for deregistration from 'may' to 'must'. Deregistration requirements should be strengthened to avoid misuse and ensure the register of life support customers is up to date. The deregistration process overcomes situations where the life support equipment is no longer required, such as when the customer moves residences and the premises remains registered. This minimises costs for networks, and ultimately customers.

### Consistency of penalties with impact

ENA supports the proposed amendments to deregistration penalties to be consistent with the level of impact. A customer will not be adversely affected from a failure to deregister, therefore an equivalent penalty to the failure to register, where there could be significant impact to the customer, is inconsistent. Amending the failure to deregister a customer when requested to a tier

2 penalty does not reduce the incentive for DNSPs or retailers to be compliant with obligations, however, it better reflects the impact of any wrongdoing.

ENA recommends implementing a timeframe of 25 business days for the deregistration to be implemented prior to penalty infringement. The timeframe is consistent with other timeframes within the life support regulatory framework, is a reasonable period of time to implement changes and supports an up-to-date register.

### Other considerations

Currently, the rules do not permit DNSPs to provide additional support other than prescribed. ENA is strongly supportive of allowing DNSPs the option to provide additional support, such as offering to provide portable batteries, where warranted. As life support customer numbers and the occurrence of extreme weather events are expected to grow, it may be more cost effective and necessary to provide additional support, especially in disaster-affected areas. However, it should not be an obligation for DNSPs to provide such additional support as it may not always be necessary and would be costly to provide on a mass scale. The rules should only permit DNSPs the option to be able to provide such additional services, not force DNSPs to do so and penalise them for not doing so.

ENA encourages the AEMC to consider implications for gas DNSPs, especially for jurisdictions with declining gas connections, and to de-couple gas obligations from electricity obligations. Currently, gas networks life support obligations mirror that of electricity networks. However, the equipment listed in the rule change proposal does not rely on a gas connection, therefore, an extension of the rules would be unnecessary. Further, where gas connections are constant or declining, additional investment related to an extension of the rules would drive up costs for the remaining customers on the network.

To ensure all customers who need life support equipment understand these amendments, ENA recommends the AER champion a national awareness campaign, as is consistent with similar work programs. This is particularly important due to the changes to a medical practitioners proposed role in life support processes. The campaign helps contribute to life support customers having a backup plan, correct contact information and being registered which is of increasing importance due to the rising occurrence of extreme weather events.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, on [vbaikie@energynetworks.com.au](mailto:vbaikie@energynetworks.com.au).

Yours sincerely,



**Russell Pendlebury**  
**General Manager Policy & Regulation**