

3 September 2025

Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Dear Sir/Madam

Re: National Energy Retail Amendment (Improving life support process) Rule 2025

TasNetworks appreciates the opportunity to provide comments to the Australian Energy Market Commission in response to its Consultation Paper on Essential Energy and SA Power Networks' rule change on improving processes for life support customers.

TasNetworks supports the intent of the rule change, which will make life support customers safer and more resilient to planned and unplanned power outages. As Tasmania's Distribution Network Service Provider (**DNSP**), TasNetworks considers that whilst current life support processes are largely fit-for-purpose, there is opportunity to clarify roles and responsibilities to improve outcomes for customers.

TasNetworks endorses the submission provided by Energy Networks Australia and makes the following additional comments.

TasNetworks supports defining the equipment used by life support customers as either assistive or critical. The new definitions will allow for appropriate customer prioritisation, increasing the safety of Tasmanian electricity users.

Given that less than 1% of life support equipment users are registered with the DNSP in Tasmania, we consider it would be inefficient to modify the National Electricity Retail Rules (**NERR**) to make DNSPs responsible for medical confirmations and the deregistration processes. However, TasNetworks does consider there to be an opportunity to strengthen the wording in the NERR to require deregistration to occur when requested by the customer or when the retailer or DNSP becomes aware that a customer is no longer considered a life support equipment user. We consider existing Business to Business (**B2B**) communications and processes are sufficient to implement this proposed change.

TasNetworks supports the proposal to introduce a requirement to maintain up-to-date medical confirmations. This change will assist in ensuring registers remain accurate. However,

introducing a permanent medical confirmation may undermine the intention of the four-year review as DNSPs and retailers would not have oversight of when permanently registered life support users need to be deregistered. We consider that processes can be kept simple by requiring all customers provide an updated medical confirmation every four years. This approach ensures life support protections are maintained without adding unnecessary burden on life support equipment users.

We acknowledge that life support equipment users may not always be the most appropriate contact person for planned outages. We are supportive of changes to the NERR that clarify the ability to have a nominated contact person and use of electronic contact details. Based on our experience, the current B2B process would require a small adjustment to implement this change by updating the Life Support Contact Person to be the Nominated Contact Person. This change acknowledges that the life support equipment user does not need to be contacted for outages unless they are also the customer or nominated contract person. We consider this change will keep outage notification processes simple and effective by limiting the number of people that must be contacted.

TasNetworks agrees that the NERR is currently ambiguous when it comes to the interpretation of "written notice" for planned outages. Given many customers' preferred contact method is via SMS or email notification, we support the proposal to clarify that outage notifications are not limited to a postal letter.

To discuss the views expressed in this submission please contact Calvin Godwin, Regulatory Analyst, at [REDACTED].

Yours sincerely

[REDACTED]

Matthew Clarke
Acting Head of Regulation