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**Australian Energy Market Commission**

Level 15, 60 Castlereagh Street  
Sydney NSW 2000

Online submission: [Lodge a submission | AEMC](#)

# M2 Energy Pty Ltd Submission to the AEMC's Improving Life Support Processes

## 1. Executive Summary

M2 Energy Pty Ltd (trading as Dodo Power & Gas) (M2 Energy) welcomes the opportunity to provide feedback on the draft determination released by the Australian Energy Market Commission on improving protections for customers requiring life support.

We strongly support the policy intent of ensuring that customers relying on life support equipment receive appropriate and reliable protections within the National Energy Customer Framework.

The proposed rule changes introduce additional procedural requirements for retailers and provide greater clarity on roles and responsibilities. Whilst these measures may strengthen accountability, M2 Energy considers that they primarily reallocate responsibility within the existing framework rather than addressing the underlying causes of data fragmentation across retailer and distributor systems.

Under the current model, life support information is maintained across multiple systems, with ongoing reliance on information exchange between market participants. This creates inherent risks in maintaining accurate and up-to-date records, particularly where processes depend on customer engagement and timely data transfer.

M2 Energy considers that, whilst improvements to processes are beneficial, it is not clear that the draft determination demonstrates systemic harm arising from current arrangements that would justify a significant increase in procedural obligations on



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retailers alone, In this context, it is important that regulatory responses remain proportionate to the risks identified.

Whilst the establishment of a centralised life support register is beyond the scope of this rule change, M2 Energy considers this consultation an appropriate opportunity to highlight the potential benefits of a more integrated approach to life support information management. A centralised register could support improved data integrity, continuity of protections, and operational resilience across the market.

M2 Energy encourages the Commission to consider whether long-term reforms to the structure of the framework may better support the objective of delivering consistent and reliable protections for life support customers.

## 2. Structural Limitations in the Current Life Support Framework

Life support protections represent one of the most critical consumer safeguards within the energy regulatory framework.

Currently, retailers are responsible for identifying and maintaining life support registers based on information provided by customers, whilst distributors also maintain their own registers and rely on notification from retailers. Whilst this arrangement allows life support customers to be identified, it also means that critical safety information is spread across multiple systems operated by different market participants.

This decentralised approach can give rise to a number of structural challenges.

### 2.1 Fragmented Data Management

Life support information exists across multiple retailer and distributor systems. Although notification processes are in place, maintaining parallel registers can lead to inconsistencies or delays in updating information. In practice, we have observed that even minor timing gaps between updates can affect operational visibility of life support status.

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## 2.2 Customer Switching Risks

Customers often switch retailers, requiring life support status to be transferred through operational processes that depend on accurate data exchange. Where these processes fail or are delayed, the incoming retailer may not immediately recognise a customer's life support status. Such gaps, whilst rare, can introduce operational risk.

## 2.3 Reliance on Customer Disclosure

Retailers rely heavily on customers to inform them when life support equipment is present. Some customers may not be aware of registration process or its significance, meaning the accuracy of life support registers is partly dependent on customer engagement and understanding.

### Evidence of Systemic Harm and Regulatory Proportionality

The draft determination notes about the accuracy of life support registers. However, it is not clear whether the evidence demonstrates systemic harm or widespread failures in protecting life support customers.

Specifically, the determination does not quantify the extent to which inaccuracies have led to missed outage notifications, inappropriate disconnections, or other material impacts. M2 Energy encourages the Commission to provide further analysis on the scale and nature of these risks, to ensure that any regulatory response remains proportionate.

These limitations suggest that improving life support protections may require more than procedural obligations on retailers. This is not to say that register accuracy is unimportant. Rather, the key question is whether inaccuracies have caused material failures—such as missed outage notifications, inappropriate disconnections, or other safety risks.

Where issues are primarily administrative, rather than resulting in direct customer harm, structural solutions — such as enhanced data-sharing frameworks or a centralised life support register — may be more effective than simply increasing procedural requirements for retailers.

Whilst improving the accuracy of life support registers is an important objective, the proposed reforms primarily reallocate responsibility for registration and ongoing

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management to retailers rather than addressing the underlying causes of data fragmentation.

Under the current framework, both retailers and distributors maintain life support registers, and this dual register model will continue under the proposed arrangements. As a result, life support information will remain distributed across multiple systems, with ongoing reliance on notification and the data exchange processes between parties.

In this context, the proposed reforms may improve accountability and procedural clarity, but may not fully resolve the root causes of register inaccuracies.

M2 Energy considers that addressing data integrity risks may require more structural solutions, including improvement to how life support information is shared, maintained and accessed across market participants.

### 3. Consideration of a Centralised Life Support Register

M2 Energy notes that the draft determination confirms that consideration of a centralised life support register is beyond the scope of this rule change.

However, M2 Energy considers it appropriate to provide commentary on this issue within the context of the current consultation, as it relates to the longer-term effectiveness and resilience of life support protections.

A central register could operate as a single source of truth for life support status across the energy market, accessible by authorised retailers and distributors. Potential benefits include:

- Improved continuity of protections – life support status would remain associated with the premises regardless of retailer switching.
- Reduced duplication of records – a single authoritative register reduces inconsistencies across multiple retailer and distributor systems.
- Stronger system resilience – emergency response and outage coordination could be enhanced.

The concept of a centralised register also draws parallels with other critical infrastructure sectors where the reliability and availability of critical customer information is essential for public safety.



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For example, in the telecommunications sector, the nationwide outage experienced by Optus on 8<sup>th</sup> November 2023 highlighted the risks that can arise when critical communications infrastructure fails. The outage disrupted mobile, broadband and fixed-line services for more than 10 million customers across Australia and prevented thousands of customers from accessing essential services. Importantly, investigations later found that thousands of attempted calls to Australia's emergency call service (000) were unable to connect during the outage, raising serious public safety concerns and triggering regulatory investigations and enforcement action.

The incident also resulted in significant scrutiny of how critical service providers manage emergency communications infrastructure and customer safety obligations. Following the outage, the Australian Communications and Media Authority (ACMA) imposed penalties on Optus after finding that more than 2,000 people were unable to connect to emergency services and that required welfare checks were not undertaken for hundreds of affected customers.

These events demonstrate the importance of clear accountability frameworks and resilient information management systems when critical services are involved. In sectors where public safety may depend on the reliability of service delivery, centralised systems and clearly defined operational responsibilities can assist in ensuring that critical information remains accessible during system disruptions or operational failures.

M2 Energy forms part of the broader Vocus Group, which operates telecommunications infrastructure and services across Australia. Through this broader corporate group, we are familiar with the regulatory expectations that apply to critical communications infrastructure and the importance of robust system design, governance and operational resilience in sectors where service reliability directly affects public safety.

M2 Energy recognises that the establishment of a central register would require careful consideration of governance, privacy, and system integration. Whilst not part of the current rule change, we encourage the Commission to note this as a potential area for future policy development, particularly where customer safety is directly affected.

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## 4. Comments on Specific Draft Rule Reforms

The rule change request was originally submitted by distribution network service providers and is mainly aimed at streamlining how retailers and distributors handle life support customer registration and communications.

M2 Energy supports the overall goal of strengthening protections for customers who rely on life support equipment.

That said, the draft rule changes seem to focus largely on adding more procedural obligations for retailers.

Whilst we have already highlighted some structural limitations in the current framework, we also want to provide our observations on the specific draft reforms the Commission is proposing.

### 4.1 Retailer Responsibility for Registration and Deregistration

The draft rule proposes that retailers take primary responsibility for the registration and deregistration of life support customers. M2 Energy supports this approach.

Retailers are usually the main point of contact for customers and already manage important information such as billing, concessions, and hardship assistance. In practice, many retailers already perform functions consistent with life support registration as part of existing processes.

The proposed reform therefore does not introduce fundamentally a new concept, but rather formalises and strengthens retailer accountability for these activities.

Clearer allocation of responsibility may assist in reducing ambiguity within the current framework. However, as life support information will continue to be maintained across both retailer and distributor systems, the effectiveness of this will still depend on the accuracy and timeliness of information exchange between market participants.

### 4.2 Improved Definitions of Life Support Users

The draft rule introduces a clearer distinction between the “life support user” and the customer account holder. M2 Energy supports improving definitions where it helps identify customers who need protection.

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In some cases, the person relying on life support equipment may not be the energy account holder. For example, an elderly parent may reside at a premises where a family member holds the electricity account. Capturing information about the actual life support user may assist distributors and retailers in responding more effectively during outages or emergency situations.

However, implementing this distinction will require changes to existing customer and account data structures. For M2 Energy, this would necessitate system enhancements within the Gentrack Velocity CRM platform to support capturing and maintaining relationships between account holders and life support users at a more granular level. These changes are not trivial and would involve updates to customer hierarchy structures, data fields, system logic and associated business processes. Therefore, sufficient implementation time will be required to design, build, test and deploy these changes effectively.

M2 Energy considers that an implementation timeframe of at least 12 months would be required to support these system changes, noting the complexity of CRM enhancements and the need to maintain operational stability and data integrity during implementation.

### 4.3 Annual Confirmation of Life Support Status

The draft rule proposes that retailers undertake periodic confirmation of whether life support protections are still required. M2 Energy supports the objective of maintaining accurate and up-to-date life support registers.

Customer circumstances may change over time—for example, medical equipment may no longer be needed, people may move, or the occupants of a premises may change. Periodic confirmation processes can therefore play an important role in ensuring the ongoing accuracy of life support information.

However, these requirements will introduce ongoing operational effort and cost for retailers, particularly where repeated customer engagement and follow-up activities are required. To manage this effectively and minimise administrative burden for both customers and retailers, M2 Energy considers that such processes would need to be implemented through digital channels, such as outbound communications (e.g. email or SMS) supported by structured response mechanisms or digital forms.

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Implementing these capabilities would require system development and integration, including updates to customer communication platforms and CRM workflows. M2 Energy estimates that a development timeframe of approximately 6 months would be required to design and implement an efficient digital solution.

Accordingly, it will be important that any regulatory implementation timeframe provides sufficient runway to enable retailers to develop and deploy these capabilities prior to enforcement.

#### 4.4 Secondary Contact Details

The proposal to record a secondary contact for life support customers could help improve communication during outages.

In some circumstances, life support users may be elderly, medically vulnerable, or unable to respond quickly to communications. Capturing an additional contact, such as a family member or carer, may assist in ensuring that outage notifications are received and acted upon when the primary contact is unavailable. This approach has the potential to improve safety outcomes during both planned and unplanned outages.

However, implementing this requirement will necessitate changes to existing customer and account data structures. For M2 Energy, this would require enhancements to the Gentrack Velocity CRM platform to support capturing and maintaining secondary contact relationships within the customer and account hierarchy. This would involve updates to data models, additional fields, system logic, and associated business processes, as well as changes to communication workflows. These are not minor changes and would require dedicated development effort, testing and deployment. These changes would also result in additional implementation and ongoing operational costs associated with system development, maintenance and customer communication processes.

As such, M2 Energy considers that a technical implementation timeframe of at least 12 months would be required to deliver these changes effectively, and that the associated development effort would also result in additional implementation costs.

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## 4.5 Use of Electronic Communications

The draft rule clarifies that retailers and distributors can use electronic channels such as SMS or email, to notify life support customers about outages. M2 Energy supports this clarification.

Electronic communications are typically faster and more reliable than traditional mail and align with modern customer preferences. For example, instead of mailing a letter days in advance, a retailer could send a text as soon as outage information becomes available. That said, customers should still have the option to receive notifications through channels if that is their preference.

## 5. Operational Considerations for Retailers

M2 Energy has identified several operational considerations associated with the proposed reforms.

### 5.1 Increasing Administrative Complexity

The proposed rule changes introduce additional process requirements relating to customer confirmation, verification and record-keeping obligations.

These include more prescriptive obligations around maintaining up-to-date life support information, undertaking periodic confirmation activities, and retaining evidence to demonstrate compliance.

Whilst these measures are intended to strengthen customer protections, they also introduce additional process layers and compliance touchpoints for retailers. This may increase administrative complexity without necessarily improving the underlying accuracy or integrity of life support data, particularly where the framework continues to rely on information provided by customers and third parties.

### 5.2 Operational Scalability for Small Retailers

The impact of increased process complexity is likely to vary depending on the size and operational maturity of retailers.

Larger retailers may be better positioned to manage additional obligations through automated systems, integrated customer platforms and dedicated compliance resources. In contrast, small retailers may rely heavily on manual processes and have more limited system capability. As a result, the proposed obligations may

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create disproportionate compliance impacts for smaller market participants, particularly where repeated customer follow-ups, data management and record-keeping requirements cannot be really automated.

### 5.3 Continued Reliance on Customer Engagement

Many life support processes still rely on customers responding to requests for information or providing confirmation of medical equipment.

In practice, customers may not always respond within expected timeframes, creating operational uncertainty for retailers.

### 5.4 Risk of Incomplete or Inaccurate Information

Retailers rely on information provided by customers and medical practitioners.

Where information is incomplete, outdated or inaccurate, retailers may face compliance risk despite acting in good faith.

### 5.5 Liability Exposure

Given the life-critical nature of electricity supply for certain medical equipment, retailers may face significant reputational and regulatory consequences if life support protections fail.

However, retailers do not control many of the factors that determine whether life support information is accurate or complete.

Without reconsideration of the structural responsibilities within the framework, additional procedural obligations may inadvertently increase compliance burden without materially improving outcomes for customers.

## 6. Additional Policy Considerations

Whilst M2 Energy supports the policy intent of the proposed reforms, we consider there are several areas where further clarification or flexibility could improve the practical operation of the framework.

These considerations are intended to support the effectiveness of the life support framework whilst ensuring that implementation remains operationally workable for retailers of different sizes.



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## 6.1 Clarification of “Reasonable Steps” Obligations

Several aspects of the proposed framework rely on retailers taking “reasonable steps” to obtain or confirm life support information.

Whilst this approach provides flexibility, greater clarity regarding regulatory expectations would assist retailers in implementing the requirements consistently.

For example, it would be helpful for the Commission to clarify:

- what constitutes reasonable steps to obtain medical confirmation
- how many attempts should be made to contact customers
- whether automated communications (such as SMS or email) satisfy these obligations.

Providing clear guidance could help ensure consistent implementation across retailers and reduce the risk of differing interpretations.

### **What this means in practice**

For example, if a retailer sends three reminders asking a customer to confirm life support status but receives no response, it is unclear whether the retailer would still be expected to maintain the registration indefinitely.

Clear guidance could help determine when a retailer has met its obligations and what further steps, if any, should be taken.

## 6.2 Standardised Medical Verification Processes

The proposed reforms rely on medical confirmation of life support equipment use.

M2 Energy considers that a standardised medical confirmation form or process could help improve the consistency and efficiency of this requirement.

Currently, retailers may receive medical documentation in a variety of formats, including handwritten doctor notes, hospital discharge summaries, and informal confirmation letters.

A standardised approach could help ensure that:

- medical information is consistent across retailers
- healthcare providers understand the information required
- customers experience a simpler verification process.

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### Example

Instead of customers obtaining different forms of documentation from their doctor, a standard national life support medical confirmation form could be used.

This would allow doctors to simply:

- tick the type of life support equipment used
- confirm whether it is medically required
- provide contact details if verification is needed.

This would simplify processes for both retailers and customers.

## 6.3 Alignment with Jurisdictional Consumer Protection Frameworks

Life support protections also intersect with jurisdictional consumer protection frameworks administered by regulators such as the Essential Services Commission.

M2 Energy considers it important that any new obligations align closely with existing state-based consumer protection requirements to avoid duplication or conflicting obligations.

Consistency across regulatory frameworks will assist retailers in implementing the reforms efficiently and minimise the risk of customer confusion.

### Example

Retailers operating across multiple jurisdictions may need to comply with:

- national life support rules
- jurisdictional consumer protection requirements
- distributor-specific procedures.

Where possible, aligning these frameworks would reduce compliance complexity and improve consistency for customers.

## 7. Implementation Considerations

Should the rule changes proceed, retailers will require sufficient time to update internal systems, processes and compliance frameworks.

Implementation will likely require system configuration updates, process changes, staff training, and updates to compliance monitoring frameworks.



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M2 Energy encourages the Commission to allow a realistic implementation period so retailers can adopt the reforms properly without disrupting day-to-day operations.

## 8. Conclusion

M2 Energy supports the objective of strengthening protections for customers requiring life support equipment and acknowledges the intent of the proposed reforms to improve the identification of life support users and enhance communication processes.

The proposed rule changes provide greater clarity of responsibility and introduce additional procedural safeguards. However, these reforms primarily increase administrative obligations for retailers and may not fully address the underlying structural limitations associated with maintaining life support information across multiple systems.

In particular, where data fragmentation remains and reliance on customer engagement continues, additional procedural requirements alone may not materially improve the accuracy or reliability of life support registers.

M2 Energy considers there is value in exploring whether more structural solutions—including more integrated or centralised approaches to life support information management—could better support long-term improvements in data integrity and customer outcomes.

M2 Energy welcomes further engagement with the Commission on approaches that strengthen life support protections whilst ensuring that regulatory arrangements remain proportionate, practical, and scalable for retailers.

If you have any queries about this submission, please contact Beata Janetzki (Head of Consumer Risk & Compliance) on 03 90023440 or [Beata.Janetzki@vocus.com.au](mailto:Beata.Janetzki@vocus.com.au).

Yours sincerely,

Signed by:  
  
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Annie Mackin

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