

Australian Energy Market Commission (AEMC)  
via online submission

Dear Commissioner,

### **Re: Improving Life Support Processes: Draft Determination**

Australian Gas Infrastructure Group (AGIG) welcomes the opportunity to provide feedback on the AEMC's draft determination outlining proposed reforms to improve life support processes in the National Energy Customer Framework (NECF) jurisdictions.

AGIG's vision is to deliver infrastructure essential to a sustainable energy future. We deliver energy to more than two million Australians every day through our transmission pipelines, distribution networks, and renewable gas projects, supporting homes, businesses, and major industrial customers that value gas for its reliability, affordability, and performance. As a gas distributor, AGIG has direct obligations under the life support framework, including providing planned outage notifications to registered life support customers and maintaining accurate life support registers.

The effectiveness of life support protections depends on a framework that can produce accurate, complete, and current life support registers and support obligations that are proportionate to actual customer risk. AGIG supports the AEMC's overall reform direction to improve outcomes for life support customers and to support accurate and current life support registers. AGIG's feedback highlights the value of a nationally consistent framework, the need for further consideration around the proportionality of distributor obligations to customer risk, and outlines the benefits of refinement of the registration and deregistration processes as to ensure the framework operates as intended.

#### **Ensuring national consistency of the life support framework**

AGIG supports a nationally consistent life support framework across the NECF and Victoria to improve interoperability of the framework across jurisdictions. This would provide greater clarity for life support customers and support for consistent customer protections across jurisdictions.

We support the AEMC's proposed content requirements for the medical confirmation form, including capturing the energy type (electricity and/or gas) used to power life support equipment. This provides an important foundation for consistent identification of relevant obligations and supports the framework's interoperability across jurisdictions.

As Victoria operates outside the NECF, there is a risk that its life support rules may diverge from the national framework in their design and application. While the AEMC has clearly specified medical confirmation content requirements, differences in how these requirements are adopted or applied across jurisdictions may expose customers to duplicative medical confirmation processes when customers move between jurisdictions.

AGIG recommends that the AEMC continue working closely with the Essential Services Commission and the AER to ensure key elements of the national framework are reflected consistently in the Victorian framework to support interoperability and consistent application of life support protections.

#### **Proportionality of life support obligations**

Under the current rules, a life support customer with only electricity-dependent equipment is automatically treated as a life support customer for their gas connection. In practice, very few life support devices rely on gas. As a result, the current rules produce a significant volume of gas life support registrations that do not reflect genuine gas dependency, undermining the utility of life support registers.

This automatic extension leads to obligations that are not proportionate to the actual risk. Gas distributors may provide planned outage notifications and other communications to customers whose life support equipment would not be impacted by a gas interruption. Furthermore, customers would be required to prepare a backup plan for gas outages that are unlikely to impact their life support equipment.

While capturing energy type information for each piece of life support equipment is an important improvement to the framework, it does not resolve the lack of clarity in distributor communication obligations across energy types. The final rule should prevent automatic extension of registration to gas distributors where no gas dependency exists in the medical confirmation form. This would ensure obligations are appropriately directed to customers with genuine gas dependency.

### **Resolving discrepancies in existing life support registers**

Distributors rely on accurate and reliable registers to fulfil their obligations, including planning and responding to outages and notifying customers of planned interruptions. AGIG supports the retailer-led model for registration, deregistration, and updating life support customer details. A single point of responsibility ensures accountability and consistency of the registers.

While the proposed approach will improve the future accuracy of registers, the draft rule does not address how existing discrepancies between retailer and distributor registers will be resolved during the transition to the new framework. Without a reconciliation process in place prior to the transition, there is a risk that these discrepancies will persist under the new framework, undermining the accuracy and reliability of the registers.

To support a consistent and reliable register from the framework commencement, AGIG recommends that the AEMC consider incorporating a reconciliation protocol between life support registers maintained by retailers and distributors prior to the new framework commencement on 1 December 2027 in the final rule.

This protocol should, at a minimum, provide clarity on which party holds the source of truth following reconciliation and sufficient time for distributors and retailers to align their registers before the new framework takes effect. Consistent with the retailer-led model, AGIG considers retailers to be the appropriate party to hold the source of truth for the register, given their role as the primary point of contact for customers.

### **Clarifying distributor obligations at initial customer contact**

We note that the draft rule enables customers to notify distributors directly for life support registration, upon which distributors must apply life support protections from that time. The draft rule also maintains that retailers are responsible for undertaking the registration process. However, the draft rule lacks clarity on whether distributors should collect customer details at first contact or whether distributors should refer customers to retailers to record customer details.

This ambiguity creates a material operational gap for distributors. Distributors could not fulfil their obligation to notify customers of any planned outages without collecting basic customer details. Conversely, if distributors collect and act on customer data, it risks creating duplication of retailer processes and inconsistencies in customer registrations and accountability.

The draft rule would benefit from explicit clarification on distributor obligations where customers notify distributors directly for registration and whether distributors would be required to collect any customer details at first contact. AGIG recommends that collecting customer details for registration purposes remain at the responsibility of retailers as it is consistent with the retailer-led model and to avoid duplication of customer records.

### **Strengthening customer information update and deregistration processes**

The effectiveness of life support registers depends not only on accurate registration and the currency of information, but also on effective and timely deregistration. Without clear guidance and obligations for customers to update their medical circumstances and for retailers to deregister customers where medical confirmation is not provided, a discretionary approach is likely to result in limited retailer action. As a result, life support registers may continue to expand over time, reducing their overall reliability.

AGIG considers that the draft rule does not sufficiently address this issue. The provision that retailers “may” deregister a premise where a customer fails to provide medical confirmation does not establish a clear expectation of action. This results in customers remaining on the register without current medical confirmation for extended periods. In addition, the draft rule does not specify any obligation for customers to respond to annual check-ins from retailers and no requirement for periodic medical reconfirmation.

Retailer churn further exposes these gaps, as changes in retailer responsibility are not necessarily visible to distributors. In the absence of clear deregistration obligations, there is a risk that outdated or unverified customer

information persists as customers move between retailers. For example, where a customer transfers to a new retailer and no longer identifies as a life support customer, the draft rule does not require the previous retailer to deregister when customers are changing retailers, nor does it enable distributors to update or remove an existing registration based on the new retailer's information alone.

These issues limit the ability of the framework to maintain accurate and current life support registers and highlight the need for a clearer and more consistent deregistration process. Therefore, AGIG recommends that the final rule mandates retailers to deregister customers where medical confirmation is not provided, unless there is a clear and documented reason the customer is unable to obtain it. This would establish clear and enforceable deregistration requirements, while maintaining sufficient flexibility to support vulnerable customers. The final rule should also clarify obligations when customers transfer between retailers, including ensuring that life support registrations remain accurate and current.

### Conclusion

The proposed reforms represent a meaningful step forward in improving life support protections across the NECF jurisdictions. Targeted refinements outlined in this submission would ensure the framework delivers on its objectives to create accurate and reliable life support registers and proportionality of obligations to actual customer risk. This would, in turn, strengthen protections and outcomes for life support customers.

Should you wish to discuss any aspect of this submission further, please contact Chris Fidler, Head of Customer and Market Services ([chris.fidler@agig.com.au](mailto:chris.fidler@agig.com.au)).

Kind regards,



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