



16 April 2026

Geoffrey Rutledge
Chief Executive Officer
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Dear Mr Rutledge,

Improving Life Support Processes – Draft Rule Change

Origin Energy (Origin) appreciates the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) consultation on Improving life support processes draft Rule change.

It is vitally important that the regulatory framework ensures that customers who rely on life support equipment receive appropriate and timely support, including clear communication and effective management of both planned and unplanned outages.

We retain our view that these objectives would be best achieved through a centralised life support register. A single register would enable customers, carers and medical professionals to register and deregister life support needs directly through a single, standardised system, ensuring consistency. This approach would eliminate unnecessary complexity and enable medical confirmation forms to be provided and stored in one location. A centralised body managing a single source of truth would also ensure that distributors, retailers and metering service providers all rely on the same record before undertaking any activity.

We share the Rule change proponents' concerns that life support registers include customers registered unnecessarily which has resulted in over-sized registers that diminish resources that should be allocated to genuine life support customers.

However, resolving this issue requires balancing significant risks. Introducing a mandatory deregistering of customers who fail to return a medical confirmation will result in a significantly reduced life support register which will result in lower costs for all customers. However, the trade-off is the risk that a legitimate life support customer could be deregistered. The consequence of making an error with a life support customer can be catastrophic.

In balancing these trade-offs, the AEMC has placed a greater weight on ensuring the Rules minimise the risk of a genuine life support customer being deregistered. While we think this is appropriate it is unlikely to result in any meaningful reduction in the size of the life support registers.

We support the defined registration and deregistration process where retailers are required to send medical confirmation reminders under given fixed timeframes, and seek medical confirmation annually, from customers that have not previously provided one.

Furthermore, we support the AEMC recognising that retailers are best placed to determine whether deregistration is appropriate when a customer has not provided medical confirmation, given their direct relationship with the customer.

Notwithstanding, we believe there are several improvements that could be made to the proposed Rules. We maintain our view that there needs to be a single point of accountability for the registration process. Allowing both retailers and networks to perform this task increases the risk of error and creates confusion for customers. This responsibility should sit with retailers.

In terms of timing, several proposed timeframes for retailers to perform certain activities are too prescriptive. For example, requiring updates within one business day creates administrative burden when there is no impact to the customer as they are already registered.

Origin's views on these matters and the draft Rules are set out further in Attachment A.

If you have any questions regarding this submission, please contact Caroline Brumby on (07) 3867 0863 or caroline.brumby@originenergy.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', written over a faint circular stamp or watermark.

Sean Greenup
Group Manager Regulatory Policy

Responses to Draft Determination

1. Definitions

1.1 *Life threatening condition definition*

We continue to have concerns regarding how medical practitioners will interpret the definition of a “life-threatening condition”. The classification is subjective, and there is a risk that practitioners may adopt a precautionary approach—defaulting to classifying customers as having a “life-threatening condition” in circumstances of uncertainty or as a matter of professional risk management.

This risk may be further exacerbated in the absence of clear guidance and targeted education for medical practitioners to support consistent and appropriate application of the classification. Without such support, there is the potential for this definition to be applied inconsistently across medical practitioners.

1.2 *Life Support User definition*

The AEMC has proposed introducing the concept of a “life support user” into the Rules to distinguish between the customer (that is, the account holder) and an individual residing at the premises who relies on life support equipment.

We do not object to the capture of information relating to the individual reliant on life support equipment, we do not consider it necessary to establish a distinct “life support user” category within billing and customer management systems. This reflects that, while such information may be recorded against an account, retailers’ contractual obligations under the National Energy Retail Rules (NERR) are to the account holder. Consistent with this framework, all communications and account interactions are conducted with the account holder, and no corresponding contractual obligations extend to additional individuals recorded against the account.

The formal incorporation of a “life support user” concept into the Rules would introduce additional administrative and system complexity. We recommend that this definition not be incorporated into the Rules and that retailers continue to capture relevant information within the existing operational frameworks.

1.3 *Secondary Contact Person definition*

It is proposed that a secondary contact person details are captured to allow for these individuals to receive notifications of outages and where there is a request to confirm life support status. While this concept is supported, the ability to capture and utilise this information will require time to design, develop and test.

We understand from discussions with the AEMC that a secondary contract person will have no authority on an account and cannot request amendments to account details. The role of the secondary contact person should be made clear in the Rules.

1.4 *Civil Penalties*

We consider it is unreasonable to attach breach penalties to the collection of “life-threatening condition” data. While retailers are obliged to request this information, the completed information is dependent upon completion by a medical practitioner and submission to the retailer by the customer. In this context, we do not believe that it is appropriate to apply a penalty provision to a retailer for actions outside of their control.

2. Registration and Deregistration

2.1 *Life support registration*

The existence of multiple “registration process owners” creates ambiguity in both the registration and deregistration processes. We support retailers assuming sole ownership for the registration and

deregistration process. This creates a single point of responsibility which reduces risk and customer confusion.

We do not support allowing customers to advise either their retailer or distributor to register as requiring life support protections. Where a customer approaches a distributor directly to inform them of a life support customer, the network should refer that customer to their retailer. The network should not be recoding this notification and then passing this onto the retailer. Partial participation by distributors introduces unnecessary complexity to systems and processes and may constrain the retailer's ability to engage with customers in a clear and effective manner to inform them of their life support obligations.

Distributors should be removed from the registration process to ensure clear lines of communication between the life support customer and to create a single point of accountability.

The proposed Rule also requires that where a retailer is informed of a life support need by either the customer or distributor, the retailer would need to inform the distributor of a life support registration within one business day. In practice, such a timeframe is unlikely to be operationally achievable having regard to: 1) the volume of life support-related transactions processed daily; and 2) the fact that most updated information is received via email and requires manual review, verification and system entry prior to onward notification.

We strongly believe the existing obligation to act "as soon as practicable" is legally robust and should be retained. It requires a retailer to act promptly and efficiently, while the terms preserve the necessary flexibility for retailers to manage competing demands and maintain data integrity.

2.2 Medical confirmation

The use of different medical confirmation forms leads to inconsistency in data collection and confusion. We agree a standardised medical confirmation form would improve the consistency and quality of data captured about life support customers.

The Rules appear to lack clarity in relation to circumstances where a customer initiates contact with a retailer and provides a valid medical confirmation form at the outset. Under the current drafting of Rule 124 of the NERR, retailers are nonetheless required to issue dated medical confirmation forms upon notification of life support registration. This obligation may be unnecessary where the customer has already provided the required documentation. We seek that the Rules be reviewed to address this scenario.

We support the development of a standardised template, as it will streamline the completion of life support forms and improve overall usability for customers. While the information included on the form will be relevant to the life support person, we also propose that the form include a confirmation that the individual seeking life support declaration is living at the address.

In terms of the content of the form, we support the removal of a medical practitioner selecting whether the life support equipment is either electricity or gas related. This introduces a risk of an incorrect selection which may subsequently necessitate the customer to re-register against the relevant fuel type. From an operational perspective, this creates unnecessary complexity and administrative burden.

We support the proposed four-year validity period for the medical confirmation form. We understand that the form will remain valid where the customer remains with the same retailer, including where they change products. However, if a customer transfers to a new retailer, they will be required to ensure that the form meets the applicable criteria at the time of transfer.

Development of the template

It is important that the content of these forms is developed through consultation not only with the medical profession and consumers, but also with retailers. Retailers will be responsible for capturing and recording this information, and due consideration must be given to current system capabilities in this context.

Finally, while we note that the medical confirmation form is scheduled to be published by 1 December 2026, it will not be available for use until 1 December 2027. It is critical that this distinction is clearly communicated to both medical practitioners and consumers as retailers may not have the capability to accept or capture this information prior to the effective date.

Medical confirmation reminder process

The proposed Rules introduces a highly prescriptive medical confirmation reminder process. Specifically, it requires confirmation reminder notices to be provided no earlier than 15 business days and no later than 25 business days from the date of either the issue of the medical confirmation or the previous reminder notice.

We support the requiring retailers not to send a reminder notice within 15 business days. Any sooner would compress actions on the customer. Furthermore, we do not think imposing notices to within the proposed time windows is practicable and does not provide retailers with flexibility to deal with individual circumstances. We consider that the existing provision of no sooner than 15 days for a notice has worked effectively to date and should be retained.

In terms of addressing concerns that this leaves the issuing of reminder notices open ended is addressed by the obligations of the annual check-in.

2.3 Ongoing requirement

We agree the introduction of an annual check will improve outcomes for consumers and support the accuracy of the register. We think this would operate effectively with our proposed position on the issuing of reminder notices. We also agree that the annual check-in will assist in confirming that the customer's details remain up to date, that they still require life support protections, and to review their emergency backup plan.

We do not believe that this process is relevant to commercial and industrial customers. These customers are registered on the basis of type or use of business rather than the use of individual medical equipment. The only time it should apply to a business customer is when someone residing at the business property is a life support customer, otherwise these sites should be treated as a sensitive load.

2.4 Deregistration

It is vitally important that the risk of incorrectly deregistering a premise that still requires life support equipment, where the customer or life support user is unable to provide medical confirmation is minimised to every extent practicable. Retailers are best placed to determine whether deregistration is appropriate when a customer has not provided medical confirmation, given their direct relationship with the customer.

We agree that the draft Rule adds robustness to the registration and deregistration process by requiring retailers to send medical confirmation reminders under given fixed timeframes, and seek medical confirmation annually, from customers that have not previously provided one. We believe this strikes a balance between the desire to better manage (reduce) life support registers while also managing the risk that a life support customer is not incorrectly deregistered.

As part of the proposed arrangement, there is a requirement for retailers to document and potentially report the reasons also give rise to uncertainty as to how this information may be used, including whether it could expose retailers to regulatory scrutiny or enforcement action for retailers exercising their discretion not to deregister a customer.

We are concerned that if incorrectly applied this provision would undermine retailer confidence in the Rules. For example, retailers face increased risk of penalties if they are not deregistering for the "right" reasons while also facing penalties if they incorrectly deregister a customer. These decisions are not straight forward and carry significant risk.

There needs to be greater certainty regarding what are acceptable reasons for not deregistering. There needs to be a better sharing of ownership of these risks between retailers and regulators, rather than retailers assuming all the risk.

In addition to clarity around regulator expectations on reason for retaining registration, we consider that a review of the applicable penalty settings is warranted to ensure a more proportionate and balanced regulatory approach to deregistration. This would better support retailers in exercising appropriate discretion to deregister an account without defaulting to unduly risk-averse outcomes.

Customer switching

Where a customer switches retailers and the status of the NMI is life support without the new customer registering as life support, distributors should remove the life support status from their end. Without this provision, the status may be repeatedly reregistered, creating a cyclical issue—particularly during the quarterly reconciliation process undertaken with distributors.

Discretion to de-register in certain situations

Origin supports the introduction of an exemption within the Rules to permit the removal of a life support registration where a customer is vacating the premises or has advised the retailer that life support equipment is no longer required.

We consider that enabling customers to provide explicit informed consent (EIC) to facilitate an expedited deregistration process will deliver meaningful benefits particularly where the request is initiated by the customer.

Date of deregistration

Under Rule 125(4)(e) of the NERR, a retailer is required to complete the deregistration of a customer's premises within five business days of the deregistration date specified in the deregistration notice. This suggests that once a deregistration notice has been issued with a specified effective date, the retailer must complete deregistration within five business days of that date or defer any action until the next annual review.

This requirement to complete deregistration within five business days of the nominated date is operationally restrictive, particularly considering the retailer's obligation to undertake additional contact attempts, including by telephone or in person, prior to proceeding with deregistration. We support the retention of the requirement to deregister "as soon as practicable" to allow retailers to complete the appropriate checks prior to completing the process.

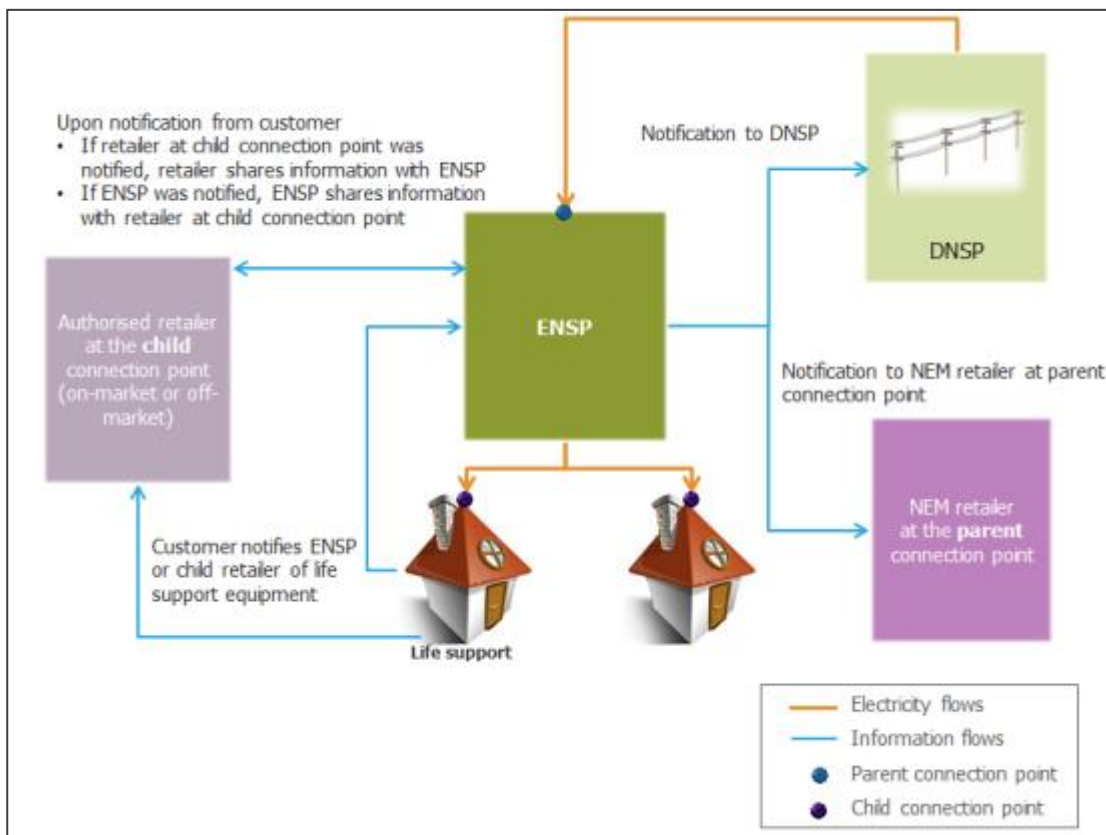
2.5 *Embedded networks*

Origin supports the strengthening of life support protections for customers within embedded networks. However, in relation to on-market child NMIs, the proposed draft Rule lacks clarity and introduces unnecessary complexity through the involvement of the Embedded Network Manager (ENM).

Consistent with the Australian Energy Market Commission's 2019 Embedded Networks Review (see figure 4.2 below)¹, we consider that life support obligations should rest with the Embedded Network Service Provider (ENSP) and not the ENM. The draft Rule does not clearly require the ENSP to notify the distributor or the parent financially responsible market participant (FRMP)/retailer of the presence of a life support customer. This creates a material risk that critical information may not be communicated to the parties best placed to respond to outages.

¹ AEMC, Updating the Regulatory Frameworks for Embedded Networks, Final Report, 20 June 2019, p. 98.

Figure 1: AEMC Life support information flows in an embedded network



Source: AEMC, Updating the Regulatory Frameworks for Embedded Networks, Final Report, 20 June 2019, p. 97.

Origin recommends that the Rule be amended to:

- Remove the Embedded Network Manager (ENM) from the life support notification process.
- Require Australian Energy Market Operator (AEMO) to make the registered Embedded Network Service Provider (ENSP) list available to retailers enabling them to identify the relevant ENSPs for their NMIs.
- Require the financially responsible market participant (FRMP) or retailer for on-market child NMIs to notify the ENSP.
- Explicitly require the ENSP to notify the distributor and the parent FRMP or retailer of the existence of life support customers at on-market child NMIs.

These amendments would align with the AEMC's prior review, simplify the allocation of obligations and strengthen accountability across the framework.

3. Transitional arrangements

3.1 Distributor notification to retailer

Origin questions whether the requirement that a distributor must advise the retailer of any shared customer who, immediately prior to the effective date, is registered by the distributor is necessary, noting that existing obligations already require parties to notify one another of life support registrations.

It may be more appropriate for retailers to rely on the status of registrations as at 1 December 2027 and apply the new Rules prospectively from that date.

Clarification is also sought as to whether distributors are expected to provide retailers with copies of medical confirmation forms as part of these transitional arrangements.

3.2 *Where the distributor has commenced communication with the customer*

The draft Rule further provides that, where a distributor has previously advised a customer that their life support registration would cease and the nominated date occurs after the commencement of the new Rules, the distributor must instruct the retailer to deregister the customer if the customer does not respond to confirm that life support is still required.

Similarly, where a distributor has issued a deregistration notice due to a failure to provide medical confirmation and the customer does not provide that confirmation by the specified date, the distributor must inform the retailer within one business day to proceed with deregistration of the premises.

Origin seeks clarification as to whether these requirements are intended to impose a mandatory obligation (“must”) or whether some degree of discretion is intended. We are particularly concerned about scenarios in which the information provided by the distributor does not align with the details held by the retailer. In such circumstances, retailers may be unable to proceed with deregistration and would not be in a position to de-register the customer without further verification.

4. Additional Origin Comments

4.1 *Application of Part 7 of the NERR*

Part 7 of the NERR sets out the obligations in relation to life support equipment. In particular, Rule 123 states *“This Part applies in relation to a customer who is a party to a contract with a retailer for the sale of energy...”*

The reference to a ‘customer’ suggests that the life support obligations are intended to apply to all customer classes rather than being confined to residential customers. This appears inconsistent with the underlying policy intent of the Rules which is to provide targeted consumer protections for small customers.

Origin considers that these obligations should only apply to residential customers. This would better align with the policy objective and ensure consistency with the position in Victoria.

4.2 *Central database*

We retain our view that the most effective and efficient approach to the management of life support customers is through a centralised life support register. A single register would enable customers, carers and medical professionals to register and deregister life support needs directly through a single, standardised system, ensuring consistency. This approach would eliminate unnecessary complexity and enable medical confirmation forms to be provided and stored in one location. A centralised body managing a single source of truth would also ensure that distributors, retailers and metering service providers all rely on the same record before undertaking any activity.

Importantly, a centralised register would deliver tangible benefits for customers. It would provide greater clarity and certainty for life support households, reduce the administrative burden of managing registrations across multiple parties and ensure that the protections they rely on are applied consistently and reliably. For customers who may already be vulnerable, this model would offer improved confidence in the integrity of the life support framework and reduce the requirements to regularly confirm medical life support status.

Origin suggests a single register could be developed and operated on a similar basis to the “Do Not Call Register”. The Do Not Call Register provides a single, centralised platform where individuals can register their preference not to receive telemarketing calls, with service providers required to check the register before initiating contact. Industry participants interact with the register through API interfaces which are regulatory utilised by the energy market.

We recommend that the AEMC continue to pursue the development of this solution. This will provide greater benefits to consumers and industry rather than continuing to apply incremental fixes to the framework.

4.3 *Market System Implications*

While the AEMC has consulted with the B2B Working Group on the proposed amendments to electricity systems, it is unclear whether equivalent consideration has been given to gas schema changes. The introduction of changes to the gas schema adds a further layer of complexity.

Origin considers that the proposed commencement date should be extended by six months to enable participants to effectively manage the combined impacts of both gas and electricity market changes.