



28 April 2026

Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
Sydney NSW 2000  
Submitted on-line [www.aemc.gov.au](http://www.aemc.gov.au)

### **Draft Rule Determination – Improving Life Support Processes (RRC0064)**

Dear Sir / Madam

Alinta Energy welcomes the opportunity to make a submission on the Draft Rule Determination – “Improving Life Support Processes”

We acknowledge that, alongside the AEMC's consultation on life support process reforms, the Essential Services Commission of Victoria is also reviewing protections for life support customers. This presents an important opportunity to better align life support obligations across Victoria and NECF jurisdictions, so customers experience consistent, simple and reliable protections regardless of where they live.

Any new or amended obligations placed on retailers must ultimately make it easier for customers to access life support protections. Processes should be efficient, transparent and designed around customer needs. Simplicity is essential to ensure customers receive timely and appropriate support.

The focus on improving register accuracy, clarifying roles and responsibilities, and strengthening communication reflects current operational challenges and is a positive step toward better outcomes for life support customers. However, several areas require further clarity to ensure the rule change can be implemented effectively and without creating unintended customer or compliance risks.

#### **Improving the deregistration and registration process.**

Alinta Energy considers some of the proposed data collection requirements exceed what is necessary to identify and support life support customers.

For example, collecting information about the relationship between a customer and their secondary contact does not contribute to outage notification processes or enhance customer protections. Gathering unnecessary personal information increases privacy risks without delivering customer benefit.

Information shared with distribution businesses should be limited to what is essential for them to perform their functions. Detailed customer data is not required for distributors to meet their obligations.

Where customers attempt to register directly with distributors the process of distributors engaging with retailers is inefficient. Distributors notifying retailers indirectly adds unnecessary steps, as retailers must still contact the customer to gather required information.

A more streamlined approach would be for distributors to advise customers to register directly with their retailer, ensuring timely engagement and reducing duplication.

If distributors continue to notify retailers of new registrations, the rule should include clear service level timeframes to ensure customers are not left waiting for protections to be activated.

The draft rule also assigns responsibility for registrations and deregistration's to retailers but does not address how this applies to existing customers currently managed by distributors. There is no clarity on:

- whether retailers will assume responsibility for all existing life support customers
- whether distributors will retain responsibility for current registrations
- how existing data, including medical confirmation forms, will be transferred

Without clear guidance, there is a risk of confusion, delays, duplication or missed registrations, which could compromise customer protections. Retailers should not be required to assume responsibility without complete and verified medical information.

To avoid these risks, the rule should clearly define ownership for existing customers, confirm whether a full transition will occur, and establish a formal process with service level obligations for transferring data and medical documentation.

### **Balance Between Accuracy and Customer Risk (Medical Confirmation)**

While annual checks and improved data capture support register accuracy, the draft rule does not place enough emphasis on maintaining valid medical confirmation, particularly for long-standing customers.

Annual contact alone may not be sufficient where customers are unresponsive. Stronger requirements for renewing and validating medical confirmation would help ensure protections remain accurate and appropriate.

### **Life-Threatening Condition Identification and Legacy Customer**

The introduction of a category for life-threatening conditions is supported, but guidance is needed on how this applies to customers registered before this distinction existed.

Given that all life support customers receive the same protections, the practical value of collecting this additional information is unclear. Geographic dispersion may limit its usefulness for prioritising restoration, and storing additional sensitive information increases administrative and compliance risks if it is not consistently relied upon.

There is also a risk that customers identified as “life-threatening” may assume they will receive priority restoration and reduce their own emergency preparedness.

### **Validation of Medical Confirmation and Escalation Pathways**

The draft rule introduces standardised medical forms but does not outline how retailers should respond when medical confirmation appears inconsistent, incomplete or potentially invalid.

Retailers are not responsible for clinical assessment, but situations may arise where:

- information appears incorrect or incomplete
- the equipment listed does not align with life support intent
- documentation appears fraudulent

There is currently no defined escalation pathway for these scenarios. A clear framework with defined roles and responsibilities is needed to maintain register accuracy and ensure customers receive appropriate protections.

### **Role and Scope of Secondary Contact**

The proposal to collect secondary contact details assumes the nominee is willing and able to receive and act on outage notifications. However, no criteria or confirmation requirements are defined.

There is no guidance on:

- who can be nominated
- whether the nominee has agreed to the role
- whether they are capable of fulfilling it

It is also unclear how this interacts with Do Not Contact obligations, particularly where the secondary contact has no existing relationship with the retailer and may be listed on the Do Not Contact Register.

Clarification is needed on whether retailers are exempt from Do Not Contact provisions when contacting nominated secondary contacts. Consideration should also be given to exempting life support notifications from SPAM Act and Do Not



Contact Register requirements to ensure customers and their nominees receive critical information without delay.

Should you have any questions or wish to discuss our submission further I may be contacted on (02) 9372 2653 or via email: [shaun.ruddy@alintaenergy.com.au](mailto:shaun.ruddy@alintaenergy.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "Shaun Ruddy", written in a cursive style.

**Shaun Ruddy**

Manager National Retail Regulation