
Consultation paper: National Energy Retail Amendment (Improving life support processes) Rule 2025

STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

To submit this form, [follow this link](#), and select the project reference code **RRC0064**.

SUBMITTER DETAILS

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DATE 16 April 2026

PROJECT DETAILS

NAME OF RULE CHANGE: Improving life support processes

PROJECT CODE: RRC0064

PROPONENT: SA Power Networks and Essential Energy

SUBMISSION DUE DATE: 16 April 2026

CHAPTER 3 – IMPROVING DEFINITIONS TO BETTER SERVE LIFE SUPPORT CUSTOMERS, AND RELATED CIVIL PENALTIES FOR BREACHES

<p>Theme 1</p>	<p>Evoenergy believes these changes will help retailers and distributors better understand the life support requirements, provide clarity on the devices used by life support customers, and identify those with life threatening conditions.</p> <p>Adding both the <i>life support user</i> and the <i>secondary contact person</i> will aid distributors, specifically around contact information and risk analysis during unplanned outages. This is notably in situations of prolonged loss of electrical supply.</p> <p>Evoenergy notes that customers who wish to have their life support registration updated to reflect a life-threatening classification will be required to submit a new medical certificate. However, Evoenergy is concerned that existing life support customers may misinterpret the proposed arrangements as requiring re-registration for their current, unchanged medical conditions, or that retailers may initiate unnecessary re-registration processes. This could result in customer uncertainty and avoidable costs and disruption, including additional medical appointments and practitioner fees. Further clarity is required to ensure both customers and retailers clearly understand that re-registration is only required where a customer is seeking to change their classification, and to avoid unintended impacts on existing life support customers.</p> <p>Evoenergy is also concerned about how these new requirements will be communicated to life support customers. There needs to be a clear and concise communication plan for all of industry, which must include healthcare providers.</p> <p>Evoenergy accepts the recommendation to not increase the Life Support equipment list. Retaining the 'Other' life support equipment field will allow inclusion of future devices initially without the need to add into the defined list in the short term, avoiding repeated Rule changes.</p> <p>Evoenergy agrees that the additional details for a 'toggle' to include if life support equipment is for gas/electricity is a must, as some customers cannot regulate their body temperature and may have existing gas heating systems.</p> <p>As a distributor, Evoenergy believes that the registered medical practitioner is the person qualified to define life-threatening conditions and appropriate life support equipment for their patients. Evoenergy understands that these changes will result in additional implementation costs across Evoenergy systems, including the need to incorporate further detail on Evoenergy's website and communication protocols.</p>
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CHAPTER 4 – IMPROVING THE REGISTRATION AND DEREGISTRATION PROCESSES

<p>Theme 2</p>	<p>Evoenergy supports a Rule whereby the Retailer is responsible for customer registration and deregistration. This approach will simplify communications, reduce duplication between retailers and distributors, and align with Retailers' communication strategies and systems, reducing implementations costs.</p> <p>The proposed changes implement a clear line of reporting, allows minimal changes to existing B2B communications as the customer can still approach either party, provides certainty for the Retailer to complete registration and would then enforce one party to be responsible for deregistration processes, including when medical confirmation has not been provided.</p>
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	<p>Evoenergy agrees that having one centralised and standard Life Support form will benefit customers, reducing localised variations and confusion of whether a retailer or distributor sent the customer a form and then who to send the completed form too.</p> <p>A standardised medical confirmation form completed by a registered medical practitioner will provide greater clarity and consistency regarding the types of equipment eligible for classification as 'Other', ensuring the life support register is utilised appropriately as a resource for eligible persons.</p> <p>In the proposed Rule, can you please review and determine best locations for the following two questions.</p> <p>Evoenergy notes that the proposed Rule change [s123B(3)(c)(iv) & (d)(ii)] includes listing the "life support equipment used by the life support user;" twice. Is this necessary for a standard form to request the same information twice as only the registered medical practitioner would have the details of the required device?</p> <p>The proposed Rule change [s123B(3)(c)(v)] requires identification of whether life support equipment is powered by gas or electricity as part of the life support user details. To ensure appropriate protections are applied during the period in which medical confirmation is being sought, Evoenergy considers this should be a clear and explicit question asked by the retailer at the point of initial registration. This would reduce the risk of unrequired protections being applied, particularly in relation to gas supply, while medical confirmation is pending.</p> <p>There will be requirements in the B2B Procedures to add new fields for a secondary contact person and their relevant contact information, along with other changes, such as to add whether support is required for 'Life Threatening' circumstances.</p> <p>These changes will likely require system upgrades that will incur significant costs to Retailers and Distributors. AEMC should consider this in the consultation to allow sufficient time to accommodate relevant changes.</p> <p>Evoenergy believes that there should be annual checks to verify life support requirements are still applicable. This will support retailers' current communication strategies, along with strengthening the customer/retailer relationship. However, for this to be effective this should be communicated to the customer immediately i.e. during sign-up/transfer or in 'welcome packs' so that they are aware of this annual requirement.</p> <p>Evoenergy welcomes the proposed changes to the deregistration process, again simplifying a very complicated process will benefit customers wholeheartedly.</p>
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CHAPTER 5 – IMPROVING COMMUNICATION METHODS TO CONTACT LIFE SUPPORT CUSTOMERS

Theme 3	<p>Evoenergy's experience with Life Support customers has shown regularly that the <i>life support user</i> is not always the account holder, thus creating some communication gaps as outlined by the Rule change proponents. We agree that having a life support application that has the ability to define the <i>life support user</i> separately from other contacts allows for improved coverage of contact.</p> <p>Evoenergy understands that costs will be incurred by all parties; however, it considers the changes to be beneficial in improving customer communication.</p> <p>Having alternative communication methods can only benefit the customer in receiving the appropriate alerts from the retailer or distributor. Evoenergy believes this will clarify these Rules requirements of notifications, along with improving outcomes for customers.</p>
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