

OFFICIAL



Better Protections for Life Support Customers in Victoria

Draft Decision

5 March 2026

Acknowledgement

We acknowledge the Traditional Owners of the lands and waterways on which we work and live.

We acknowledge all Aboriginal and Torres Strait Islander communities, and pay our respects to Elders past and present.

As the First Peoples of this land, belonging to the world's oldest living cultures, we recognise and value their knowledge, and ongoing role in shaping and enriching the story of Victoria.

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Summary

Better protections for life support customers in Victoria

The Essential Services Commission ('the commission') is reviewing the state's energy rules to strengthen protections for life support customers in Victoria. The review aims to improve processes and communications with life support customers. It also aims to support emergency services to better identify and triage life support customers during prolonged power outages.

Our preferred options have considered implementation and ongoing costs as well as benefits across regulated energy businesses (retailers, distributors, exempt sellers and exempt distributors), consumers, government agencies and departments.

We intend to strike the right balance between providing strong protections for life support customers and:

- ensuring customers can access protections in a simple and timely manner
- increasing the accuracy of life support registers to support emergency services to triage and contact customers during prolonged power outages
- aligning Victorian rules, to the extent possible, with other jurisdictions under the National Energy Customer Framework (NECF).

The commission is working closely with the Australian Energy Market Commission (AEMC), who is progressing a similar review in parallel to ours.

Table 1 summarises the key draft reforms. Our proposed reforms include amendments to the Energy Retail Code of Practice, the Electricity Distribution Code of Practice and the Gas Distribution Code of Practice (the codes of practice).

We are working with Victoria's Department of Energy, Environment and Climate Action to assess any regulatory changes that may require legislative amendments or changes to Orders in Council to implement the proposed reforms.

We invite interested parties to provide feedback on our proposed reforms by **5 pm, 16 April 2026**. We will consider all feedback received in our final decision, which we expect to publish in June 2026.

Table 11: Summary of proposed reforms

Proposed change	Proposed reforms
<p>New ‘life-threatening’ system flag</p>	<p>We propose creating a ‘life-threatening’ flag in registers. This will enable medical practitioners to identify customers at higher risk of injury or death during prolonged power outages.</p> <p>This can support emergency services to triage customers for more urgent support during prolonged power outages.</p> <p>This flag in registers will not affect ongoing consumer protections: all life support customers will receive the same level of protections currently available in our codes of practice.</p>
<p>Updating the responsibility for the life support register, including all related processes</p>	<p>Under our proposal, retailers will be exclusively responsible for updating life support registers. Only retailers can make changes to the register, including:</p> <ul style="list-style-type: none"> • registering new customers • following up on medical confirmation • initiating updates to information in life support registers • deregistering customers. <p>Life support customers can still contact a distributor directly to be included on a life support register. In those cases, the distributor must notify the customer’s retailer so they can undertake the registration process.</p> <p>Retailers will be responsible for any changes following registration. If a customer contacts a distributor for any other reason than initial registration, the distributor must inform the customer that they need to contact their retailer directly.</p> <p>Retailers must deregister customers when:</p> <ul style="list-style-type: none"> • a customer requests to be removed from the register • retailers become aware that life support equipment is no longer required at a premises. <p>Retailers can still choose whether they deregister customers who do not provide medical confirmation. However, retailers</p>

	<p>must record the reason for retaining a customer that has not provided medical confirmation on the register.</p>
<p>Updating medical confirmation processes</p>	<p>We propose to work with key interested parties to design a standard medical confirmation form.</p> <p>Medical confirmation would only be accepted through the new standard medical confirmation.</p> <p>The form will include information about:</p> <ul style="list-style-type: none"> • the type of equipment used • whether the life support resident has a life-threatening condition • contact details for the customer and for a secondary contact person. <p>Customers who have already provided medical confirmation would not have to update their medical confirmation. If a customer wants to be identified as having a life-threatening condition, they would need to submit the new proposed medical confirmation form.</p>
<p>Yearly check-ins</p>	<p>We are proposing that retailers will need to check in with life support customers at least once a year. They will need to confirm whether life support equipment is still required at the premises and ensure details are up to date.</p> <p>If the customer is not medically confirmed, the retailer must remind the customer to provide medical confirmation.</p> <p>Retailers will need to check whether:</p> <ul style="list-style-type: none"> • life support equipment is still needed at the premises or has changed • the life support resident's condition has changed (especially whether they might now have a life-threatening condition) • the life support customer's contact details are up to date • the secondary contact person's details are up to date. <p>If the life support customer fails to respond to a yearly check-in and has not provided medical confirmation, retailers must</p>

Improving communication methods for contacting life support customers

send reminder notices to begin a deregistration process. However, retailers can still choose whether to deregister the customer after completing this process.

Under our proposal, retailers must collect information about the preferred communication method (such as email, SMS or post) for life support customers and secondary contacts.

Retailers must provide information and notices related to life support according to the life support customer's and secondary contact's preferred method of communication.

Some electronic methods may already be used for some life support communications. This rule will require energy businesses to allow life support customers and secondary contacts to nominate a preferred contact method. Energy businesses must use the preferred contact method for all mandatory notifications.

Retailers, exempt sellers and distributors would have to accept customers' nominated secondary contact for contact during outages and emergencies. The secondary contact could be the life support resident (the user of the equipment), if they are not the account holder, or a third party.

Our approach to options development

We assessed different reform options for each theme considered in this review. Each chapter presents the options considered and explains our preferred option.

Each reform theme has been divided into four sections:

- introduction
- feedback received
- analysis
- draft decision.

The analysis section of each reform theme outlines the options proposed in this draft decision paper. They have been weighed against a base case scenario. For the purposes of this review, the base case is the *status quo*, where there is no regulatory intervention or change to the current life support framework.

Summary

Summary of questions

We welcome feedback on the following questions and any other issues related to this draft decision.

Table 22: Questions for interested parties

Proposed change	Questions
New 'life-threatening' system flag	<ol style="list-style-type: none"> 1. What are your views on the proposed identification of customers with a life-threatening condition to support emergency agencies? Are there any alternative approaches that should be considered? 2. Is the terminology of 'life-threatening condition', including the definition and the term itself, appropriate and useful for the purposes of emergency triage? If not, what other terminology or definition should we use?
Retailer ownership of registration, deregistration and updating of details	<ol style="list-style-type: none"> 3. Do you have any views on making retailers solely responsible for registration, deregistration and updating life support customers' details? 4. Are there any preferable alternative methods to streamline processes to register, deregister or update life support customer details? 5. Do you have any views on specific components of the proposed updated deregistration process (including mandatory deregistration following changes in a customer's circumstances and the requirement to record reasons for retaining a customer on the register where medical confirmation has not been provided)?
Updating medical confirmation processes	<ol style="list-style-type: none"> 6. Do you have any views on our proposal to update medical confirmation processes? 7. Do you have any feedback on mandating retailers to undertake a yearly check-in process to update the information in their life support register?
Improving communication methods for contacting life support customers	<ol style="list-style-type: none"> 8. Do you have any views on our proposed approach to enable the nomination of a secondary contact person to receive communications in addition to a life support customer? 9. Do you have any views on our proposal to mandate energy businesses to collect and use a life support customer and secondary contact's preferred communication method (including electronic communications)?
Implementation	<ol style="list-style-type: none"> 10. Are there any additional costs and benefits that we should consider for the proposed reforms?

11. Are there any additional implementation issues we should consider for each proposed reform?
12. Do you have any feedback on the proposed implementation timeframes for the proposed reforms?

Structure of this paper

The [introduction](#) section of this paper outlines the background that informed this review, our approach for supporting life support customers and a summary of the feedback we have received to date.

The section on our [preferred options](#) to enhance life support protections for Victorian consumers presents our preferred policy options.

The [implementation](#) section outlines our proposed approach to transition arrangements while the proposed reforms are being implemented.

The [next steps](#) section presents the key upcoming milestones of this review.

Indicative timeline

The key dates for this review are:

Consultation period for the draft decision: 5 March to 16 April 2026

Final decision and updated codes of practice: expected June 2026

Updated obligations take effect:

- Transitional check-in: 1 July 2026 – 31 December 2026
- First yearly check-in: 1 January 2027 – 31 December 2027
- All other reforms: 1 December 2027.

How to provide feedback

Submissions should be made via [Engage Victoria](#) by **5 pm on 16 April 2026**.

Submissions will be published on the commission's website, except where the submitting party has identified the submission or part thereof as commercially sensitive or confidential, in accordance with our [Submissions Policy](#).

Submissions should clearly identify which information is sensitive or confidential and the basis for the claim.

We are also open to meeting with interested parties to discuss specific feedback. We will continue to proactively engage with the community, industry, government departments and agencies through individual meetings as this review progresses.

Please contact energyreform@esc.vic.gov.au if you have any questions or would like to arrange a meeting.

Introduction

This draft decision paper seeks feedback on our proposed reforms to life support protections applicable to energy businesses (retailers, distributors, exempt sellers and exempt distributors). Our draft decision has been informed by feedback from interested parties on our *Better protections for life support customers in Victoria* consultation paper, and extensive engagement with key organisations.

This review is informed by the Victorian Government's Network Resilience Review and Network Outage Review.¹ Those reviews evaluated the stability and reliability of Victoria's distribution network infrastructure, as well as their operators' response to prolonged power outages. While the reviews had different purposes, they shared common goals in minimising network disruptions and enhancing service continuity.

Both reviews indicated that life support rules needed to be improved to address issues with the accuracy and size of life support registers. The current size of these registers has negatively impacted emergency services' ability to identify, triage and prioritise people with critical needs, who are reliant on life support equipment during prolonged power outages.

The Victorian Government supported all 19 recommendations stemming from the Network Outage Review, including delivering better outcomes for life support customers during major outages.² The Victorian Government's response commits to working with industry to improve customer support and progressing measures that uplift protections for people relying on life support equipment.

Aligned with this commitment, the Victorian Government supported working with the Energy Charter's #BetterTogether rule change initiative to help implement a nationally consistent approach to the life support framework. This rule change proposal brings distributors, retailers, government agencies and consumer groups together to make improvements such as:

- clearer life support definitions
- a standard medical confirmation form
- better registration and deregistration processes
- improved communications during outages.

¹ Electricity Network Resilience Review Expert Panel 2022, [Electricity Distribution Network Resilience Review: Final Recommendations Report 2022](#), Department of Environment, Land, Water and Planning, State Government of Victoria, Melbourne; Network Outage Review Expert Panel, [Storm and Power Outage Event Independent Review of Transmission and Distribution Businesses Operational Response: Final Report 2024](#), State Government of Victoria, Melbourne.

² Department of Energy, Environment and Climate Action 2024, [Victorian Government Response to the Network Outage Review 2024](#), Department of Energy, Environment and Climate Action, State Government of Victoria, Melbourne.

The Australian Energy Market Commission (AEMC) is conducting a similar review of life support protections. The AEMC's review responds to a rule change request from Essential Energy and SA Power Networks (the proponents). The rule change request is based on the Energy Charter's #BetterTogether Life Support Customer initiative, with proposed changes to the National Energy Retail rules (NERR).³ The NERR does not apply in Victoria. Therefore, if the AEMC makes the proposed rule changes, those changes would not apply in Victoria.

We are working closely with the AEMC to align rules across jurisdictions where possible. A consistent approach to life support protections and processes across different states and territories would provide greater clarity for life support customers (particularly those moving interstate), energy businesses and medical practitioners.

Our approach to this review

Our approach to this review is centred on improving processes to deliver more accurate and up-to-date life support registers. This will help emergency services and energy businesses assist customers who rely on life support equipment during power outages.

Victoria's life support framework applies to both gas and electricity. Gas heating can be particularly critical for some life support customers during winter. For this reason, we propose that the reforms outlined in this paper extend to gas. This will grant protections for customers who rely on gas to fuel their life support equipment. As part of the development of the medical confirmation form, we will assess how best to identify life support customers' electricity and gas needs to improve the accuracy of life support registers.

Victoria's life support framework is distinct from that in the National Energy Customer Framework (NECF). In Victoria, life support provisions are set in the *Electricity Industry Act 2000* and *Gas Industry Act 2001*, and prescribed in the Energy Retail Code of Practice, Gas Distribution Code of Practice and Electricity Distribution Code of Practice (the codes of practice).

Additionally, the General Exemption Order 2022 and the Gas Embedded Network General Exemption Order 2025 regulate persons exempt from holding a licence. The Governor in Council issues and reviews these instruments. We are working with Victoria's Department of Energy, Environment and Climate Action to determine if any of the proposed reforms require legislative amendments or changes to these orders. The proposed amendments to the Gas Distribution Code of Practice include a proposed new Schedule 1A. This schedule clarifies which provisions of that

³ Essential Energy & SA Power Networks, [Rule Change Request # BetterTogether Better Protections for Life Support Customers](#), 23 August 2024.

code of practice applies to exempt gas distributors, in accordance with clause 5 of the Gas Embedded Network General Exemption Order 2025. We have kept the same provisions listed in Schedule 1 of the Gas Embedded Network General Exemption Order 2025 and made adjustments to reflect the proposed amendments within scope of this review. Schedule 1 of the Gas Embedded Network General Exemption Order 2025 will no longer apply if the proposed amendments come into effect.

Our engagement to date

We have engaged extensively with interested parties to enhance protections for life support customers in Victoria. Our consultation process involved multiple opportunities for feedback and discussion.

Consultation paper

On 31 July 2025, we released a [consultation paper](#) that invited feedback on reforms intended to strengthen life support protections for Victorian customers.

This included improving registration and deregistration processes, new and amended life support definitions and improving methods for contacting life support customers during an emergency.

The consultation period closed on 4 September 2025. We received 22 written submissions and 6 survey responses from energy businesses, consumer advocates, organisations representing medical practitioners, government and peak industry bodies.

Submissions to our consultation paper are available on our [website](#).

Online information session

During the public consultation period, we held an online information session on 14 August 2025 to provide an overview of the proposed reforms and facilitate discussion.

This session was attended by representatives from the energy industry, health and emergency sectors, and consumer advocates, who contributed valuable insights and views. Their feedback indicated a desire for clear and improved processes. These include medical confirmation forms, registration and deregistration processes, and communication with emergency services and medical professionals.

A recording of the session is available on our [website](#).

Joint workshops with industry members

The Australian Energy Market Commission (AEMC) and the commission held joint workshops with industry following feedback to the consultation paper.

Introduction

Participants highlighted the need for clearer delineation of roles and responsibilities in the registration and deregistration process, particularly when customers change retailers.

Distributors' feedback

On 21 October 2025, the commission and the AEMC co-chaired a workshop with distributors to test reform options.

Distributors raised concerns about the:

- lack of retailer compliance with deregistration procedures
- operational and system costs associated with reform implementation
- challenges posed by inconsistent rules across jurisdictions.

There was broad support for retailer-led registration, as long as there are stronger incentives and enforcement mechanisms to ensure registers are accurate.

Retailers' feedback

On 23 October 2025, we held another joint workshop with the AEMC and engaged with retailers to discuss proposed reforms to the life support registration and deregistration processes. This workshop focused on improving the accuracy of life support registers, clarifying roles and responsibilities across market participants, and addressing inefficiencies in customer transfer processes.

Retailers were concerned of ambiguity in the obligations, particularly the use of 'may deregister', which was viewed as contributing to inflated registers and operational uncertainty.

Several participants advocated for a shift toward mandatory deregistration requirements, supported by clear timeframes and safeguards.

Others emphasised the need to retain flexibility for unique customer circumstances.

We also heard feedback on the challenges of obtaining timely medical confirmation and the potential benefits of standardising confirmation forms across jurisdictions. There was broad support for reforms that strengthen retailer accountability, reduce duplication between retailers and distributors, and improve customer outcomes without imposing excessive compliance burdens.

Meetings with consumer advocates, medical practitioners and emergency service representatives

To ensure that reforms are practical and feasibly address life support customer needs, we also met with consumer advocates, medical practitioners and emergency services representatives. We were interested in ways to support emergency services agencies prioritise life support customers at higher death or injury risk during prolonged power outages.

Introduction

We spoke with consumer advocates to test the proposed registration and deregistration processes, and how to reduce burden on life support customers.

Medical practitioners provided insights into the types of life support equipment available in the market. They also shared how practitioners might make assessments of customers' medical conditions, which will be used by emergency services for triage during prolonged outages.

Emergency services shared their experiences on prolonged power outages. They suggested ways to prioritise life support customers in line with broader emergency response protocols, and help improve customer resilience during an outage event.

Our approach to assessing options for reforms

For each set of reforms, we considered the benefits and disadvantages of our proposals to life support customers, and the potential costs and benefits to energy businesses.

Base case

The base case assumes that no reform is progressed, and the current rules apply.

Under the base case:

- Responsibility for the accuracy of registers is shared between retailers and distributors. Neither party has the primary responsibility for ensuring the accuracy of life support registers. Retailers likely continue to remain risk-averse in their deregistration practices, leading to potential further inaccuracy in life support registers.
- There is no standard medical confirmation form. Customers and medical practitioners may fill out different forms depending on their retailer. It is unclear whether retailers can accept the medical confirmation forms of other retailers (for example, if a life support customer changes retailer) or across jurisdictions.
- During a prolonged outage, emergency services would need to spend time cleaning the data received from distributors. The data would have limited use for emergency triage.

Options design and development

To maximise alignment with other jurisdictions, our starting point for developing options was the rule change proposal submitted by Essential Energy and SA Power Networks to the AEMC.

We consulted extensively, sent data requests to retailers and distributors, organised a formal engagement period, and held meetings with interested parties. This helped us understand the issues faced by customers, energy businesses, and emergency services.

We refined the existing rule change proposal and developed alternative options that could achieve a similar intent. Our aim is to help life support customers access protections easily, and to ensure emergency services receive more useful data for triage.

Central register

The original rule change request suggested a central register for life support customers. Many interested parties agreed there would be benefits for a central register.

We note that Australian Energy Market Operator's (AEMO) B2B system does not currently store any customer information. It only facilitates the exchange of life support customer information between retailers and distributors. A new system and IT infrastructure would be needed to store registration information centrally. It would also need to be designed so that all relevant businesses can access and update the register, as required under the life support rules. This may require external investment from an independent third-party or government department to implement.

A central database would also likely require legislative change at the Commonwealth and Victorian level. It would also likely involve coordinating discussions with other agencies that may fall outside our regulatory remit. Our role only extends to improving the current protections for energy customers and the rules for energy businesses in Victoria. The latter includes an obligation to record data in their registers and provide it to emergency services for use during prolonged power outages. A centralised register would be outside our powers and functions. However, we support exploring the benefits of a national register.

Approach to analysis

In each section, we assess each reform option against four broad criteria:

- the extent it improves the accuracy of life support registers
- the extent it improves the data given to emergency services for triage
- the benefits or drawbacks to life support customers
- the benefits or costs to energy businesses.

When weighing up each option, we prioritised improving the accuracy of life support registers for emergency services.

When considering potential costs to businesses, most options did not vary greatly in terms of overall cost to industry. For example, cost savings to distributors often came at the expense of higher costs to retailers or vice versa.

We also noted that the proposed options would reduce the current cost of maintaining large registers. Registers have become larger over time, and appears to include many customers who no longer require life support equipment. Where other factors were approximately equal, we selected the option with the lowest estimated costs to industry.

Our preferred options to enhance life support protections for Victorian consumers

Our preferred options to enhance life support protections for Victorian consumers

Proposed new 'life-threatening' system flag

Summary of draft decision

The commission is proposing not to implement the categories of assistive or critical life support equipment recommended by the rule change proponents to the AEMC.

Instead, under our proposed approach, we will:

- Create a 'life-threatening' flag to be used in life support registers. It will not affect a customer's life support consumer protections, and is only intended to support emergency triage purposes. Customers can only be flagged with a 'life-threatening' condition via a medical confirmation form.
- Work with relevant emergency agencies⁴ to improve the data they receive from distributors during prolonged power outages.
- Mandate the collection of equipment type for life support customers – this information is already a required field in B2B systems.

We proposed to not change or introduce other definitions, as interested parties did not suggest any changes were needed. This includes terms such as 'registered medical practitioner', 'life support user', or the current list of life support equipment.

Introduction

This reform aims to support emergency services to better triage and prioritise customers at higher risk during prolonged power outages. We considered what information should be collected from customers and shared with emergency services when needed.

Under the current framework, we regulate the type of information that energy businesses collect from customers. Electricity distribution businesses must also provide some of that information to emergency services during a prolonged outage.

⁴ The Department of Energy, Environment and Climate Action, Department of Health, and Department of Families, Fairness and Housing.

Using life support data during widespread power outages

In Victoria, distributors must provide certain information to the Department of Health under both the Electricity Distribution Code of Practice and protocols issued by the department.⁵ This information includes the street address of any point of supply when a widespread power outage is likely to last for more than 24 hours. It also includes the names and contact details of life support customers impacted by the outage. We understand that information about the type of life support equipment used is not currently shared with the department.

During extended power outages, the Department of Health cross-references the distributors' list of life support customers with a list of customers on ventilators provided by the Austin Hospital. The Department of Health and the Department of Families, Fairness and Housing then organise welfare checks by SMS, phone calls and door-knocking, as required.

By including information on equipment type used (such as a ventilator) in life support registers, the Department of Health can spend less time cleaning and cross-checking data. This will free up emergency resources during critical periods.⁶

The Department of Health and the Department of Families, Fairness and Housing informed us that many life support customers contacted during emergencies do not require assistance. Some may have moved house, may no longer need life support equipment, or have alternative arrangements for when power goes out. This restricts efficient use of limited emergency management resources, potentially further endangering life support residents who need assistance. A key objective of this reform is to provide emergency services with a more targeted list of people who need help during an emergency.

In its rule change request, the proponents also suggested creating two categories of life support equipment: critical and assistive. Critical equipment would be that necessary to sustain life or avoid irreversible injury. Assistive equipment would encompass all other equipment that a medical practitioner considers necessary to assist life. This information could also be used for triaging.

Feedback received

Support for assistive and critical definitions differed between industry and consumer groups.

⁵ Section 11.8 of the [Electricity Distribution Code of Practice](#).

⁶ Within Victorian energy regulation, a 'life support resident' means a person who requires life support equipment.

Retailers and distributors were either neutral on the definitions or supported them, arguing they would help with triage during prolonged power outages.⁷

Consumer groups, including the Consumer Action Law Centre (CALC), Westjustice, Victorian Council of Social Service (VCOSS), and Energy Consumers Australia, opposed the critical and assistive distinction. They mentioned that the new definitions would lead to a tiered category of life support customers, with reduced protections for customers under the assistive category.⁸

The Australian Medical Association (AMA) and the Royal Australian College of General Practitioners (RACGP) supported implementing assistive and critical definitions. They noted that these definitions align with current clinical assessments made by practitioners.⁹ Both the AMA and RACGP expressed that the definitions must be clear for practitioners and patients.

Groups representing medical practitioners and medical assistive technology users emphasised the importance of time and context when assessing the criticality of life support equipment.

However, the AMA noted it is not feasible to ask practitioners to assess the amount of time a life support resident could go without power.¹⁰

The Australian College of Rural and Remote Medicine (ACRRM) mentioned the importance of clearer guidance for clinicians. It suggested practical examples to distinguish different needs. It also recommended a model that recognises how medical criticality can change over hours, days or weeks, rather than a rigid binary split, which might be too restrictive.¹¹

The Department of Families, Fairness and Housing and the Department of Energy, Environment and Climate Action emphasised the importance of accurate life support information to assist with triage during emergencies.¹² They advocated for distributors to only share data from medically

⁷ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), 4 September 2025: AusNet (4 September 2025, p. 4); Australian Gas Infrastructure Group (4 September 2025, p. 4); EnergyAustralia (4 September 2025, p. 1); Energy On (3 September 2025, p. 1); Jemena (4 September 2025, pp. 1 & 4).

⁸ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), 4 September 2025: Consumer Action Law Centre and Westjustice (16 September 2025, p. 6); Energy Consumers Australia (4 September 2025, pp. 9–11); Victorian Council of Social Service (16 September 2025, p. 3).

⁹ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), Australian Medical Association (19 December 2025); Royal Australian College of General Practitioners (15 December 2025).

¹⁰ Australian Medical Association, op cit., p. 2.

¹¹ Australian College of Rural and Remote Medicine (ACRRM), email, 28 January 2026.

¹² Department of Energy, Environment and Climate Action, email, 27 November 2025; Department of Families, Fairness and Housing, email, 28 November 2025.

Our preferred options to enhance life support protections for Victorian consumers

confirmed life support customers. They also confirmed that a marker of priority, such as an assistive/critical flag, would help them during emergencies.

These departments were broadly supportive of the changes. They noted that emergency services need to prioritise whom they proactively contact, as some customers are at higher risk during a power outage.

Analysis

When assessing the options, we balanced maximising consumer protections and providing accurate data for emergency services to help triage customers during major outages.

Life support registers currently serve two important functions:

- they identify the customers that cannot be disconnected for non-payment (they may still be disconnected during planned or unplanned outages)
- they are a source of data for emergency services during prolonged power outages that can be used to direct help to those who need it the most during an emergency.

We considered two types of customer information that energy businesses should collect:

- the type of equipment a life support customer relies on
- the criticality of that customer's condition.

Requiring energy businesses to record equipment type

We propose requiring retailers to collect 'equipment type' data in life support registers.

This information can be useful to emergency services when triaging customers during an emergency. The data is currently a mandatory field in B2B systems, which retailers and distributors use to share information. We also understand that energy businesses currently collect this data, however it is not required by our codes of practice.

Options for recording the criticality of a life support resident's condition

Emergency services noted that the criticality of a customer's condition was an important factor in emergency triage. It can also recognise the nuances of a customer's medical condition, based on their individual circumstances.

We considered the following three options to record this information.

Table 33: Options for recording the criticality of a life support resident’s condition

Option	Description
Critical and assistive categories of life support equipment	Implementing assistive and critical definitions for life support equipment, as described in the original rule change request to the AEMC.
‘Life-threatening’ condition	Implementing a system flag for medical practitioners to indicate, via the medical confirmation form, that a life support customer has a life-threatening condition.
Time-based measure of criticality	Implementing a system flag for medical practitioners to indicate, via the medical confirmation form, how long a life support customer could go without power before facing a significant likelihood of serious injury or death (for example, 24 hours, 48 hours or 72+ hours).

Critical and assistive categories of life support equipment

Under the approach of the original rule change request, retailers were concerned of the responsibility to assess whether a customer had assistive or critical life support equipment (before medical confirmation). Consumer groups were also concerned about the perception that customers with ‘assistive’ needs were not important, have fewer protections, or lose their protections entirely.

‘Life threatening’ system flag

Our preferred option is to allow customers to be recorded in the register as having a ‘life-threatening’ condition.

A retailer can only flag the customer after receiving medical confirmation. Medical practitioners will use the medical confirmation form to flag customers with a higher likelihood of permanent injury or death during a prolonged power outage.

This recognises that medical practitioners are better placed than energy businesses to assess a customer’s condition.

The ‘life-threatening’ condition flag is only intended to support emergency triage. All life support customers will still receive the same protections as they do now. This addresses consumer groups’ concerns of a two-tier system of consumer protections.

Time-based measure of criticality

We are proposing not to implement a time-based measure of criticality.

This option would allow medical practitioners to record how long a life support customer could go without energy before becoming critical (for example, 24 hours or 48 hours).

Several interested parties, including medical professionals, noted that some customers could develop a critical need the longer a power outage goes on. However, medical professionals would need to consider many factors to make an assessment (for example, temperature and the availability of non-emergency services). Making an assessment without the context of a specific outage could be unreliable.

Benefits to emergency services and life support customers

Emergency services can benefit from better information to help triage customers and speed up welfare check times during a power outage. This could also reduce the time and cost spent triaging during emergency events. Some life support customers may receive more timely help at critical times, especially those at higher risk of permanent injury or death during a prolonged power outage. The Department of Health, the Department of Families, Fairness and Housing and the Department of Energy, Environment and Climate Change supported these views.

We are also working with these departments to ensure the suitability of the data that distributors provide during emergencies.

Implementation costs

We do not expect a 'life-threatening' system flag to impose a large burden on life support customers. Medical professionals noted the assessment could be made during a regular appointment when completing a medical confirmation form.

However, if an existing medically confirmed customer wants to be flagged as having a 'life-threatening' condition, they must submit a new form (signed by their medical practitioner). This will be a once-off, but optional burden for some current life support customers. It will be important for retailers to clearly communicate this to customers during their first round of yearly check-ins.

Adding a flag to record a customer's criticality would require system changes to B2B processes, and retailer and distributor systems. It would cost industry to setup its systems and processes to accurately record extra customer information. These costs would apply to any of the options we considered. To minimise these costs, we propose that retailers only flag a customer's 'life-threatening' condition after receiving back a medical confirmation form. This would take fewer steps and processes, compared to a retailer making an initial assessment of a customer's condition, or flagging a provisional status for some customers.

We do not consider there are any new costs for retailers to record a customer's equipment type. B2B systems already provide for retailers to record equipment type, and energy businesses have existing systems and processes in place to collect this data. Importantly, distributors already have access to this data during a prolonged outage.

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While the proposed reforms will add some cost to industry, we value the added benefit to emergency services during prolonged outages. We also aimed to minimise further costs to industry by using the information and processes that energy businesses already use.

Suggestions that have not been progressed for reform

New and updated definitions

The proponents suggested creating a definition for ‘life support user’ and ‘registered medical practitioner’. We do not consider that these changes are needed. The definition of ‘life support user’ already aligns with the definition of ‘life support resident’ in Victorian legislation.

Victoria’s *Interpretation of Legislation Act 1984* defines a ‘registered medical practitioner’ as ‘a person registered under the Health Practitioner Regulation National Law to practise in the medical profession (other than as a student)’.¹³ This definition already applies to the relevant codes of practice and Acts.

We are not proposing to update the list of life support equipment, as suggested by the proponents. In Victoria, this list is defined in the *Electricity Industry Act 2000*, the *Gas Industry Act 2001* and complemented by Schedule 7 of the Energy Retail Code of Practice.¹⁴ There was no clear rationale to progress this change. We also received feedback from interested parties against the suggested list, as it imposes age restrictions for some equipment without clear medical justification.¹⁵

Backup plans for life support customers

The proponents suggested using a [backup plan template](#) developed by the Energy Charter, including an associated awareness campaign, to help and encourage life support customers to develop backup plans in case of outages.¹⁶ This has the potential to assist emergency services by ensuring more life support customers are as prepared as possible in the case of a prolonged power outage. It will also likely reduce pressure on critical emergency resources.

We acknowledge the importance of power outage preparedness. We welcome views on how to increase consumer awareness of backup plans.

¹³ Subsection 38EA(1) of the *Interpretation of Legislation Act 1984*.

¹⁴ Clause 40SA of the *Electricity Industry Act 2000* and Clause 48DC of the *Gas Industry Act 2001*.

¹⁵ [Submissions to the Essential Services Commission ‘Better Protections for Life Support Customers in Victoria: Consultation Paper’](#), Consumer Action Law Centre and Westjustice (16 September 2025, pp. 6–10), Origin, (9 September 2025, p. 3).

¹⁶ Essential Energy & SA Power Networks, op. cit., pp. 20 & 26–27; ‘Power Outage Plan’, The Energy Charter, accessed 11 December 2025, <https://lifesupport.poweroutageplan.com.au/>.

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We also propose to include links to The Energy Charter's [backup planning template](#): Power Outage Plan for Life Support in the Home both on our website and on the proposed medical confirmation form.¹⁷ Retailers can also share this information with life support customers upon registration.

Our draft decision

We are proposing to require energy retailers to collect two kinds of data for life support registers:

- equipment type
- whether a life support resident has been flagged as having a 'life-threatening' condition.

We are also proposing to require distributors to provide the Department of Health more specific information during a widespread supply event, including as a minimum:

- the contact details and communication preferences of the life support customer and any secondary contact person
- whether the life support customer has provided medical confirmation
- the life support equipment used by the life support resident and
- whether the life support resident has a life-threatening condition.

We will work with energy businesses and AEMO to ensure that all data required to support emergency agencies is collected by retailers and appropriately shared with distributors through B2B processes. Distributors would then be able to provide this information to emergency agencies when required.

The 'life-threatening' system flag is only intended to be used for emergency management purposes. Consumer protections for life support customers will remain unchanged and apply to all life support customers. We are proposing a definition of 'life-threatening' condition as follows:

A life-threatening condition means a condition that a registered medical practitioner has identified in the relevant *medical confirmation* as being one where the *life support resident* would be at a high likelihood of death or permanent injury if the *life support equipment* used by that *life support resident* was to be without power during a prolonged power outage.

This approach balances the accessibility and accuracy of life support registers. Customers will still receive protections immediately upon registration request. At the same time, if this data is needed

¹⁷ 'Power Outage Plan for Life Support in the Home', The Energy Charter, accessed 11 December 2025, <https://lifesupport.poweroutageplan.com.au/>.

during emergencies, emergency services can be confident that a medical practitioner has assessed a customer's condition.

Questions

1. What are your views on the proposed identification of customers with a life-threatening condition to support emergency agencies? Are there any alternative approaches that should be considered?
2. Is the terminology of 'life-threatening' condition, including the definition and the term itself, appropriate and useful for the purposes of emergency triage? If not, what other terminology or definition should we use?

Proposed new approach to registering and deregistering life support customers

Summary of draft decision

We propose to make retailers and exempt sellers exclusively responsible for registering and deregistering life support customers.

Under our proposed approach:

- Retailers and exempt sellers will also be responsible for maintaining and updating life support registers. Only retailers and exempt sellers can make changes to the register, including for registration, medical confirmation and deregistration.
- Life support customers can continue to request registration through a retailer, exempt seller, distributor or exempt distributor. If a customer contacts their distributor or exempt distributor, the distributor or exempt distributor must notify the retailer or exempt seller. Only retailers and exempt sellers can start registration of a customer in a life support register.
- Retailers must deregister customers when a customer requests to be removed from the register or a retailer becomes aware that life support equipment is no longer required at a premises.
- Deregistration for lack of medical confirmation will remain at a retailer's discretion. However, the retailer will be required to record the reason for maintaining a customer in the life support register despite medical confirmation not being provided.

Introduction

This reform aims to clarify the roles and responsibilities of retailers, exempt sellers and distributors for registering and deregistering life support customers. We are also proposing to introduce mandatory deregistration obligations. This aims to support more accurate life support registers, through clear lines of responsibility for accuracy.

The life support framework was designed to reduce barriers to customer registration and to help them quickly access protections. To enable a 'no-wrong-door' approach to life support registration processes, the current rules allow customers to register through their retailer or distributor. The party that registers the customer becomes the registration process owner, who is then responsible for following up on medical confirmation (and deregistering the customer if required).

Existing rules place most of the risk of wrongful deregistration (and potential disconnection) on retailers. On the other hand, the operational costs of large, inaccurate registers (for example,

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during power outage recovery planning and field responses) are borne by distributors.¹⁸ This has led to inconsistent industry practices, long deregistration timeframes and a tendency to avoid deregistration altogether, even when life support protections may no longer be needed.

The rule change proposal submitted to the AEMC mentioned that when one party deregisters a customer, it is common for another party to refuse deregistration. This causes discrepancies in energy businesses' life support registers. When retailers and distributors reconcile life support information across their registers, customers who should have been deregistered are re-registered instead.

As noted in the Victorian Government's response to the Network Outage Review, inaccuracy of life support registers makes prioritising those in most need difficult during prolonged power outages.¹⁹ We heard that many customers contacted during emergencies no longer required life support equipment.

This also leads to duplicated efforts and higher management costs for energy businesses. It can also cause distress for family members of life support customers, when they receive a (re)registration package or a new registration notice related to a person who has died.

New proposed approach

Our proposed approach would make retailers (and exempt sellers where relevant) the owners of registration and deregistration processes. Retailers would be solely responsible for the end-to-end life support process.

We did not propose this change in our consultation paper. We developed it in response to feedback on other changes that we proposed in the consultation paper.

We also propose that retailers would have to deregister customers at their request or when they become aware that life support protections are no longer needed. Retailers would also need to maintain records of any decision to not deregister a customer who has not provided medical confirmation.

Under current rules, retailers and distributors may deregister customers who no longer require life support protections, but they are not required to do so.²⁰ Registers have become large and contain many customers who may no longer rely on life support equipment.

¹⁸ Essential Energy & SA Power Networks, op. cit., p. 23.

¹⁹ Department of Energy, Environment and Climate Action, op. cit., p. 18.

²⁰ [Energy Retail Code of Practice](#), clause 166(6)(a); [Electricity Distribution Code of Practice](#), clause 12.5.5(a); [Gas Distribution Code of Practice](#), clause 7.10.1(a).

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This proposed approach:

- removes ambiguity about responsibility
- supports consistent industry practices
- enables better compliance monitoring.

Retailers are best positioned to own this process, given their relationship with customers and established systems for communication and account management.

By tightening registration and deregistration rules, this reform seeks to maintain protections for customers who rely on life support equipment. It also improves register accuracy, reduces operational inefficiencies and supports fair and transparent practices across the industry.

Feedback received

Many interested parties emphasised that the roles and responsibilities for registration, medical confirmation and deregistration processes were unclear and that processes could be streamlined.²¹

Exclusive retailer management of life support registrations was not tested in our consultation paper. However, some interested parties shared their views on how this could be applied. AGL, Energy Consumers Australia, and Jemena suggested that retailers own the register.²² Origin, on the other hand, suggested that responsibility for managing the register should sit with distributors.²³

We also tested our approach with retailers and distributors through separate workshops, run jointly with the AEMC. Both retailers and distributors were broadly supportive of the proposed changes. However, industry members raised that retailers' ownership of the registration process on its own would not significantly address the inefficiencies in registers.

Most interested parties opposed the recommendation to mandate deregistration when medical confirmation is not obtained from a life support customer.

Consumer groups preferred some flexibility for deregistration. Energy Consumers Australia stated that shifting from a discretionary to a mandatory approach removes the flexibility needed to protect households experiencing vulnerability, who may face genuine barriers to providing timely medical confirmation.²⁴ It cautioned that instances in which a customer does not provide medical

²¹ Energy Consumers Australia, op. cit., p. 6; Origin, op. cit., p. 1.

²² [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), AGL (4 September 2025, p. 3); Energy Consumers Australia (4 September 2025, p. 9); Jemena (4 September 2025, p. 7).

²³ Origin, op. cit., p. 2.

²⁴ Energy Consumers Australia, op. cit., p.12–13.

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confirmation do not necessarily mean they no longer have life support needs. Instead, they may indicate they cannot comply with administrative requirements.

VCOSS expressed concerns about shifting the burden of proof for removal from life support registers onto customers experiencing vulnerability. VCOSS opposed mandatory deregistration and stressed that deregistration should only occur when the life support customer has informed the retailer or distributor that registration is not required.²⁵

Most distributors and retailers also cautioned against mandatory deregistration and advocated for flexibility when dealing with customers who had not provided medical confirmation.²⁶ They highlighted the need for discretion to prevent negative outcomes such as wrongful disconnection or loss of protections for customers. Engie highlighted the need for transitional arrangements while new processes are being set up.²⁷

Origin supported making the deregistration process mandatory when medical confirmation is not provided, but only if responsibility is clearly assigned to one party.²⁸

Analysis

The dual responsibility for maintaining life support registers has led to confusion and inaccuracy. We have considered whether to make retailers or distributors the sole owners of the registration and deregistration processes.

Key considerations included ensuring registering for life support is easy for customers, which businesses have the greatest incentives to maintain accurate registers, and minimising the cost and burden for industry.

We considered the options based on:

- consumer burden and risk of incorrect deregistration
- efficiency gains in joint/individual responsibility for life support registers
- costs for additional capability to handle registration, medical confirmation and deregistration processes
- benefits of streamlining processes.

²⁵ Victorian Council of Social Service, op. cit., p. 4.

²⁶ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), AusNet (4 September 2025, p. 6); EnergyAustralia (4 September 2025, p. 2); Engie (4 September 2025, p. 3).

²⁷ Engie, op. cit., p. 3.

²⁸ Origin, op. cit., p. 7.

Ownership of life support registers and processes

We considered two options for who should own the life support process, the retailer or distributor. There are pros and cons for each approach.

Distributors face high costs to communicate with life support customers during outages, due to a growing and large life support register. Registers have grown due to outdated information (such as a life support customer no longer living at a property or not providing medical confirmation after a long period). Distributors want accurate and smaller life support registers.

On the other hand, retailers face serious penalties and reputational risk for incorrectly removing a customer from the life support register and disconnecting them. This means that some retailers avoid deregistering customers (even if they follow the processes correctly).

Additionally, energy customers usually contact their retailer, rather than their distributor, for administrative issues. For life support, over 90 per cent of registrations are through retailers.²⁹

We propose having retailers own the registration and deregistration processes for life support customers. This would give customers a single point of contact for life support processes and can reduce customer confusion.

A yearly check-in would also provide financial incentives to help counterbalance the risk aversion retailers have historically shown to deregistration (see [Proposed new approach to medical confirmation](#)). The fewer the number of entries in life support registers for people who do not require life support, the lower the ongoing cost of conducting yearly check-ins.

Once a retailer registers a customer, they must also pass any relevant information (and any updated information) to distributors. Distributors must keep this information to contact life support customers about outages and to pass it on to the Department of Health as required.

Ease of registration for customers

A key concern is that registering for life support protections remains accessible. We want to ensure there is a 'no-wrong-door' policy for registration. Customers can request to be registered through either retailers or distributors.

Under our proposal, if a customer contacts a distributor to register, the distributor will collect the customer's details and notify their retailer within one business day. The retailer then adds the

²⁹ Jemena cites that retailers have registered over 98 per cent of their life support customers while the #BetterTogether rule change request cites that 95 per cent of life support registrations in the Energex (QLD) network area and 89 per cent in the Ergon Energy (QLD) network area are through retailers (Essential Energy & SA Power Networks, op. cit., p. 23; Jemena, op. cit., p. 7).

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customer to their life support register and completes the registration process (such as providing relevant information and a medical confirmation form to the customer).

This option will create a small delay for a customer to receive life support protections if they apply directly to their distributor. It would mean a two business days registration, compared to one business day if they applied to their retailer.³⁰ We consider this delay is outweighed by the benefits for customers of being able to apply to either retailers or distributors.

If a customer contacts a distributor for other purposes (for example, to update contact details), the distributor would not make any changes to their register nor would they be obliged to contact the relevant retailer. Instead, they must advise the customer to contact their retailer. This approach differs to the one proposed for registration requests made through distributors. We consider this distinction necessary to avoid inconsistencies in the register. Unlike registration, updating the register would likely require one of the two options:

- distributors to make changes to their records before passing the updates to retailers
- distributors to maintain a provisional list of updates, separate from their life support register.

Either approach would introduce additional complexity and potential confusion. These could perpetuate existing inconsistencies in the registers. Assigning end-to-end responsibility for register updates to a single entity is critical to ensuring the accuracy and reliability of life support data.

When considering the life support customer experience holistically, retailers have access to additional information about their customers. This means retailers can more easily identify vulnerabilities that may be relevant when contacting a customer, such as payment difficulty or family violence.

Updating details or applying to deregister

Under our proposal, life support customers can contact only their retailer to update their details or to ask to be deregistered. If a customer contacts their distributor for these reasons, the distributor must re-direct the customer to speak to their retailer. This could result in some delays for the customer.

However, the risks of these delays are lower than the risks of the delays for registration. If a customer takes longer to be deregistered or to update their details, protections still apply.

³⁰ Currently, if a customer applies for life support protections with their distributor, they receive the protections within one business day. Under our proposal, life support protections from the distributor will only apply once the distributor has notified the retailer (within one business day) and the retailer has, in turn, added the customer to their life support register and sent the update to the distributor (also within one business day). This means it will take a maximum of two business days for a life support customer to receive all protections if they contact their distributor.

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If distributors continue to be able to update life support customers' details or deregister those customers, they must also comply with other reforms proposed in this draft decision paper, such as undertaking yearly check-ins. This would also add further costs and complexity for B2B and energy businesses systems. Having both distributors and retailers make changes to life support registrations can also increase the risk of error.

Our proposal to only allow retailers to update details or deregister can create extra burden for some life support customers. However, because most customers already contact their retailers for these processes, this burden will not affect many customers or diminish consumer protections.

Mandatory deregistration

As noted by many interested parties, there are risks with mandatory deregistration. However, there are some circumstances in which the benefits of deregistration are clear, and the risks are relatively low.

We heard during consultation about customers asking to be deregistered because the life support resident had died, only to be contacted again about life support protections. This has been distressing for customers. These accounts matched findings from the Electricity Distribution Network Resilience Review.³¹ We also heard that at least part of the problem has been retailers' risk-aversion to deregistration.

Therefore, we propose that retailers must deregister a customer when the customer advises that they no longer require life support equipment at their premises. This could be because the life support resident has moved, died or because they no longer require life support equipment.

As per current deregistration requirements, retailers will need to give a written notice and wait 15 days before deregistering a life support customer, as a precaution against incorrect deregistration. A life support customer can give explicit informed consent for a shorter period.

This reform will help improve life support register accuracy by ensuring those who report life support equipment is no longer needed are removed from registers.

Retailers are still expected to begin the deregistration process for customers who do not provide medical confirmation.

³¹ Electricity Network Resilience Review Expert Panel, op. cit., p. 48.

Retailers to keep a record of reasons for not deregistering a customer

Deregistration for failure to provide medical confirmation will remain at the retailer's discretion. This gives retailers flexibility to assess a customer's particular circumstances. It also allows a retailer to give a customer more time to provide medical confirmation.

However, we propose that retailers must keep a record of the reason for not deregistering a customer (if they have not provided medical confirmation). This will help ensure transparency and accountability when managing the life support register. It also provides some disincentive for a retailer to keep a customer on the register, even if they should be deregistered.

Maintaining records will also support compliance monitoring and enforcement activities. For example, it may help identify cases where discretion has been exercised to retain customers on the register because of their particular circumstances. This approach is aligned with the AER's Life Support Registration Guide, which emphasises this record-keeping requirement as a key safeguard that balances register accuracy with consumer protections.³² Finally, keeping records will help us monitor the implementation of the proposed reforms and assess the need for additional reforms.

Costs and benefits of implementation

Currently, life support customers can register, deregister and update their details through either their retailer or distributor. This means that both retailers and distributors must maintain customer service processes for these purposes, even though distributors are the process owners for only a small minority of life support customers.

Making one party solely responsible for these processes reduces duplication.

On average, distributors register 10 per cent or less of life support customers. Making them solely responsible for life support registration would require a substantially broader customer-facing role in the energy market. In turn, this would require increased customer service capability (including building new systems), staff, and training requirements. This would likely represent a substantial cost to their business.

In comparison, retailers are currently responsible for more than 90 per cent of life support registrations. Additionally, retailers already have established communication channels to notify and follow-up customers. This means most retailers would not incur high additional costs. It will also cost less for retailers to be solely responsible for life support registers, compared to distributors. These costs could also be partially offset by savings to distributors.

³² Australian Energy Regulator, [Life support registration guide 2021](#), 23 September 2021, p. 6.

There are also benefits to this proposed reform. We understand that some retailers and distributors have different information on life support customers (depending on who the process owner is). Having retailers solely responsible for life support registers will reduce these inconsistencies. More accurate life support data will benefit emergency services, who rely on accurate information during prolonged outages.

We do not expect retailers to incur substantial costs for additional record-keeping requirements. Retailers already have broad record-keeping requirements under the Energy Retail Code of Practice. We have intentionally aligned these requirements to minimise the burden. The recorded data is also beneficial to the commission for monitoring implementation, checking compliance, and informing future reforms.

We expect minimal additional burden to life support customers. Customers will be able to register by contacting either retailers or distributors, which is largely unchanged from the current situation. When updating details, customers will need to contact their retailer. This represents a slight additional burden only for the small percentage of life support customers who contact their distributors rather than retailers.

Our draft decision

We propose that retailers own all processes related to the registration, deregistration, and updating of life support customers' details.

Under our proposed approach:

- If a customer contacts their distributor to be registered for life support protections, the distributor must pass these details on to the relevant retailer, who then proceeds to conduct all other registration processes. If a customer contacts their distributor for other life support-related purposes (for example, to update their contact details), the distributor will advise them to contact their retailer.
- When a customer advises a retailer that life support equipment is no longer required at a premises, retailers will be required to deregister the life support customer. They will still need to give customers 15 days' notice before deregistration.
- Where a retailer may deregister a life support customer for not providing medical confirmation, if the retailer chooses not to deregister the life support customer, it must record the reason for doing so.

We consider that this approach will provide clear lines of responsibility for maintaining accurate life support registers while providing a no-wrong-door policy for life support registration. We also estimate it to be the lowest-cost option for industry as a whole.

We note that our proposed approach still retains discretion for retailers to deregister a customer who does not provide medical confirmation. This flexibility allows retailers to account for a

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customer's specific circumstances. However, a retailer would need to record the reasons for not deregistering a customer. We recognise that some interested parties advocated for mandatory deregistration. We welcome views on whether our proposed approach is appropriate.

We note that there will be a slight additional delay if a customer contacts their distributor rather than their retailer to register for life support. However, we believe this is offset by the benefits outlined above, especially given that this currently appears to be only a small minority of cases.

Exempt electricity sellers will continue to be required to notify their retailer and any exempt distributors if no life support customer remains registered with that exempt seller. We propose to clarify that if an exempt seller has multiple sites, this obligation applies if no life support customers remain registered at a particular supply point.³³

Questions

3. Do you have any views on making retailers solely responsible for registration, deregistration and updating life support customers' details?
4. Are there any preferable alternative methods to streamline processes to register, deregister or update life support customer details?
5. Do you have any views on specific components of the proposed updated deregistration process (including mandatory deregistration following changes in a customer's circumstances and the requirement to record reasons for retaining a customer on the register where medical confirmation has not been provided)?

³³ [Energy Retail Code of Practice](#), clause 171(3).

Proposed new approach to medical confirmation

Summary of draft decision

- The commission will work with the AEMC, the AER and other key interested parties to design a standard medical confirmation form.
- We propose for retailers to check in with customers at least once a year, to ensure life support equipment is still required at a premises and that customer details are up to date.
- We do not agree that life support customers should need to update their medical confirmation every four years. We also do not agree in capping the times a customer can apply to register as a life support customer without upfront medical confirmation.

Introduction

This reform aims to improve the accuracy and integrity of life support registers while reducing the burden on customers, medical practitioners, and energy businesses.

In the rule change request to the AEMC, the proponents stated that one in five premises registered for life support lacked medical confirmation. Data from energy businesses ranged from 40 to 70 percent for medically unconfirmed life support customers.³⁴ Data reported to the AER indicates 31 per cent of life support customers were unconfirmed.³⁵

Findings from the Electricity Distribution Network Resilience Review also noted that during prolonged power outages, welfare checks were conducted for properties where the life support resident had died.³⁶ This aligns with feedback from emergency services, who reported that during doorknocks, many people contacted no longer needed life support equipment, while others could not be contacted at all.

To increase the number of customers in the register with medical confirmation, the proponents suggested:

- **Four-year medical confirmations.** This would require customers to provide medical confirmation every four years. They also proposed allowing medical practitioners to indicate a permanent condition, exempting the customer from this requirement.

³⁴ Essential Energy & SA Power Networks, op. cit., p. 23. We also received direct data on non-medically confirmed life support customers from Jemena (45 per cent) and a retailer (78 per cent).

³⁵ Australian Energy Regulator, [Schedule 6 - Quarter 1 2025 – 26 retail performance data](#), 24 December 2025. NB: This data is for other jurisdictions but is still indicative for Victoria.

³⁶ Electricity Network Resilience Review Expert Panel, op. cit., p. 48.

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- **Yearly check-ins.** This would require retailers to check-in with customers yearly, to ensure life support equipment was still required at a property and that customer details were up to date.
- **Cap on registrations.** This would cap the number of times a customer could apply to register for life support protections, without upfront medical confirmation. They suggested that this would reduce misuse of the register.

The proponents also developed a sample medical confirmation form. It suggested using the standard medical confirmation form across the industry.

Feedback

Medical confirmation form

There was broad support in principle for developing a standard medical confirmation form. However, we received substantial feedback on the content of the form.

Industry stated that standardisation would make it easier to complete and submit forms.³⁷ Groups representing medical practitioners were also supportive of a standardised form.³⁸ The RACGP emphasised that the form should be designed to minimise administrative burden on practitioners.³⁹ The ACRRM mentioned that clinicians prefer paper-based options (with a simple, easily accessible online alternative) and supported uniform forms across states based on health needs. The ACRRM also raised the importance of simple instructions and culturally appropriate communication for First Nations communities.⁴⁰

Consumer groups were more neutral about the proposal for a standard form. However, CALC and Westjustice supported a standardised form in principle.⁴¹

Many interested parties, including consumer groups, energy businesses and government organisations gave feedback on the form designed by the proponents to make it more useful and accessible.⁴²

³⁷ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), AusNet (4 September 2025, p. 6); CitiPower, Powercor & United Energy (4 September 2025, p. 7); Engie (4 September 2025, p. 3); Origin (9 September 2025, p. 8); Shell (4 September 2025, p. 5).

³⁸ Australian Medical Association, op. cit., p. 2; Royal Australian College of General Practitioners, op. cit., p. 1.

³⁹ Royal Australian College of Medical Practitioners, op. cit., p. 2.

⁴⁰ Australian College of Rural and Remote Medicine (ACRRM), email, 28 January 2026.

⁴¹ Community Action Law Centre & Westjustice, op. cit., p. 16.

⁴² [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), Community Action Law Centre & Westjustice (16 September 2025); Department of Health (11 September, p. 30); Origin (9 September 2025, p. 12); Victorian Council of Social Service (16 September 2025, p. 12).

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CALC and Westjustice highlighted potential risks around privacy and data sovereignty relating to enabling First Nations customers to self-identify within a medical confirmation form.⁴³

Four-year medical confirmation and yearly check-ins

Consumer groups opposed the requirement for an updated medical confirmation every four years.⁴⁴ They highlighted that mandating to update medical confirmation would increase the barriers to obtaining life support protections. CALC and Westjustice cited a report by the Australian Energy Foundation, which indicated that very few life support residents describe themselves as having a temporary medical condition.⁴⁵ Therefore, regular updates would provide minimal improvements to register accuracy.

Most retailers and distributors supported the four-year medical confirmation requirement, stating they consider this would help maintain the accuracy of registers and slow their expansion.⁴⁶

However, Engie emphasised that the four-year requirement would impose unnecessary costs on certain customers. Origin highlighted that renewing medical confirmation every four years could be costly for energy businesses.⁴⁷ As an alternative, Engie suggested that retailers could regularly check in with customers to confirm if they still require life support equipment.⁴⁸

Cap on registrations

There was mixed feedback on the proposed cap on registrations. Industry broadly supported the cap, highlighting the importance of deterring bad actors who misuse the register.⁴⁹ The Australian Gas Infrastructure Group and AusNet noted there would be potential implementation difficulties.⁵⁰

Consumer groups opposed the cap. CALC and Westjustice refuted claims about people misusing the register. Energy Consumers Australia raised more research was needed to determine if the

⁴³ Consumer Action Law Centre & Westjustice, op. cit., p.18.

⁴⁴ Community Action Law Centre & Westjustice, op. cit., pp. 11–13; Energy Consumers Australia, op. cit., 14.

⁴⁵ Consumer Action Law Centre & Westjustice, op. cit., p.11; Australian Energy Foundation, [Better outcomes for energy consumers using life support equipment at home](#), August 2021, p. 61.

⁴⁶ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), AGL (4 September 2025, p. 4); AusNet (4 September 2025, p. 2); Australian Gas Infrastructure Group (4 September 2025, p. 2); Red and Lumo (4 September 2025, p. 2).

⁴⁷ Engie, op. cit., p. 2; Origin, op. cit., p. 6.

⁴⁸ Engie, op. cit., p. 2.

⁴⁹ AGL, op. cit., p. 2; AusNet, op. cit., p. 7; Engie, op. cit., p. 2; Jemena, op. cit., p. 2; Origin, op. cit., p. 6.

⁵⁰ AusNet, op. cit., p. 7; Australian Gas Infrastructure Group op. cit., p. 4.

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issue was systemic or just anecdotal.⁵¹ All three organisations stated they believed a cap could result in genuine life support customers missing protections.

Analysis

In assessing the proposals, we aim to improve data for emergency services while placing minimal burden on life support customers. We also want to ensure protections are accessible to customers, while considering the cost to industry. As these reforms complement each other, we have assessed them separately against the base case.

Introducing a standard medical confirmation form

We propose to design a standard medical confirmation form, following the overwhelming support from interested parties. A standard form would bring clarity for customers and medical practitioners, if it is well-designed for those users.

We plan to consult directly with customers with lived experience of using life support equipment, medical practitioners and other key parties on the content and format of the medical confirmation form. We aim to collect the right information and make it easy for medical practitioners to complete during a regular consultation.

We will design the form so that it can be used across jurisdictions – we will engage with the AER to help design the form. This could simplify processes for medical practitioners and retailers who operate across different states.

Under our proposal, retailers will continue to provide a medical confirmation form to customers as part of the registration process. The form will be made available online, allowing easy access for customers and medical practitioners. We will work with retailers, distributors and other parties to ensure the form is promoted among key groups, including life support residents and customers, and medical practitioners.

We consider the ability for First Nations customers to self-identify may be better assessed as part of the development of the medical confirmation form.

Yearly check-in requirements

We consider there are substantial benefits of requiring retailers to conduct a yearly check-in with registered life support customers.

⁵¹ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), Community Action Law Centre & Westjustice (16 September 2025, p. 11); Energy Consumers Australia (4 September 2025, pp. 13–14).

Under our proposed approach, retailers must check in with customers once a year (on their own schedule). Retailers must notify a life support customer in writing, by electronic means (for example, email or SMS) or post. Retailers may also choose to follow up with a phone call to improve response rates. We encourage retailers to use the communication methods most likely to elicit a response from customers. The notification must remind customers to provide medical confirmation (if they have not provided it previously). It must also ask customers to confirm life support equipment is still required at the premises, and to provide any updated information. We expect retailers to make this process as easy as possible for customers.

Retailers must update any details provided by a customer. Retailers will need to consider existing family violence protections, including account security protections such as identifying a safe method of communication.

We propose to clarify in the Energy Retail Code of Practice that, if a secondary contact person has been nominated and the customer is identified as affected by family violence, a retailer must seek customer's consent to contact the secondary contact person. If the customer does not consent, the retailer must remove the secondary contact from their registers and ask whether the customer would like to nominate an alternative secondary contact person.

We also propose to clarify that a retailer must not disclose or provide access to confidential information about an affected customer to any other person without the consent of the affected customer. This includes disclosing information to a secondary contact person or an authorised representative. If a retailer updates the secondary contact details, it must notify the distributor within one business day following the regular process, so the distributor can also remove those secondary contact details.

If a customer indicates their circumstances have changed, such as using new equipment, retailers will encourage the customer to submit an updated medical confirmation form.

The currency of life support equipment and whether a condition is 'life-threatening' are important details for triage during a prolonged power outage. We strongly recommend that retailers communicate this to customers during the yearly check-in.⁵² Any changes to equipment type or whether a person's condition is considered 'life-threatening' can only be made with an updated medical confirmation form.

⁵² For example, a customer who initially required a CPAP machine may later need a ventilator and therefore become a higher priority during an emergency. Similarly, a customer who initially had not been assessed by their practitioner as having a life-threatening condition, may later have one.

Deregistration process

Under our proposal, following an annual check-in, if the customer states that life-support equipment is no longer required at the premises, the retailer must deregister the customer.

If medical confirmation has never been provided and the life support customer does not respond to the retailer’s check-in, the retailer must begin the existing deregistration process. This would use the processes under the current rules, to send customers reminders and a deregistration notice.

However, deregistration will not be mandatory, so that retailers can consider a customer’s specific circumstances. Retailers will still have discretion to deregister the life support customer.

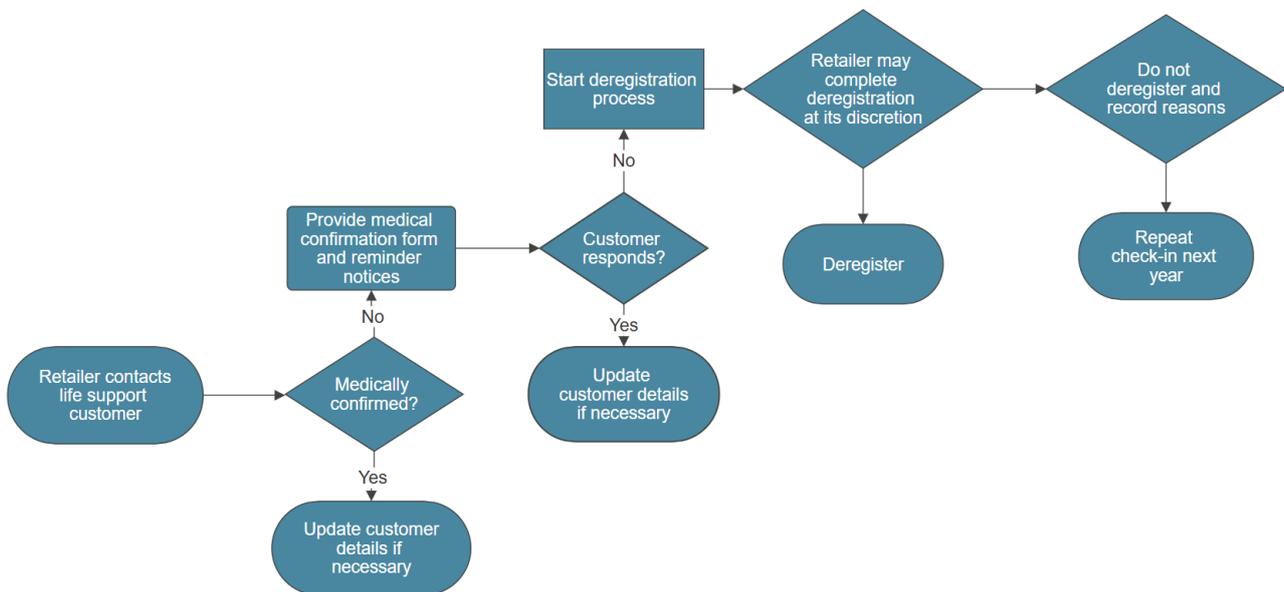
Limiting the use of existing medical confirmation forms to up to four-years

We propose not to require life support customers to provide updated medical confirmation every four years (discussed below).

However, to align with current NERR requirements, we will require that medical confirmation be no more than four years old when provided for registration. This means that if a life support customer changes retailer, they can only use a medical confirmation form that is less than four years old.

Customers who have been with the same retailer for more than four years will not have to provide updated medical confirmation.

Figure 1: The yearly check-in process



Suggestions that have not been progressed for reform

Four-year medical confirmations

In the original rule change request to the AEMC, the proponents suggested life support customers should provide updated medical confirmation every four years. They also proposed there should be an option for a medical practitioner to confirm if a customer has a permanent condition, exempting them from this requirement.

We will not proceed with this proposed reform. We consider this proposal adds more complexity and cost, compared to its benefits.

Several interested parties shared evidence that most life support residents will rely on their equipment for life. Under the proposal, most life support customers could then receive a permanent exemption from the requirement, minimising its effectiveness.⁵³ It also means that it is unlikely this proposal would significantly decrease life support registrations over time.

Customers with a lifelong condition will also face added costs and emotional burden. Recent research by the Australian Bureau of Statistics shows that almost a quarter of Australians living with long-term health conditions report they are already waiting longer than they felt acceptable for general practitioner or specialist appointments. Similarly, a third of those in outer regional or remote areas report waiting unacceptable times, more than those living in major cities.⁵⁴

This proposal would also lead to more process changes from retailers. If most customers are eligible to re-register, retailers must repeat the entire registration process for life support customers every four years.

Cap on registrations

The proponents suggested allowing customers to register, without providing medical confirmation, only up to two times. If medical confirmation were not provided during either attempt, retailers could automatically reject any subsequent applications that did not have medical confirmation up front. We will not proceed with this reform.

We appreciate the importance of ensuring that those on registers genuinely require life support equipment. However, this needs to be balanced with making life support protections accessible to customers experiencing vulnerability.

⁵³ Consumer Action Law Centre & Westjustice, op. cit., p. 11; Australian Energy Foundation, op. cit., p. 61.

⁵⁴ Australian Bureau of Statistics, [Patient Experiences](#), 18 November 2025.

The proponents shared anecdotal examples of premises being inappropriately registered as having life support equipment. However, the proponents have provided minimal evidence that misuse of life support registers is a substantial or systemic issue. In the figures cited by the proponents, only 3.6 per cent of registered life support customers with AusNet had five or more registrations or deregistrations.⁵⁵ Our efforts to verify the proponents' claim also did not return robust data.

We also considered the consequences of a legitimate life support customer missing out on protections – we consider that these potential harms outweigh the benefits of a cap.

Costs and benefits of implementation

The two reforms we are proposing – a standard medical confirmation form and yearly check-ins – will result in costs to industry and some extra burden for life support customers. However, there are benefits to emergency services and energy businesses for having up-to-date life support registers.

We are also not progressing with other proposals suggested by proponents. These proposals would have added more costs for diminishing benefits (given the yearly check-in).

Standard medical confirmation form

A standard form will simplify data collection and medical confirmation processes for retailers. Retailers will need to make system changes to accept the data from the new forms. However, all information requested in the form is either already required or proposed as new requirements in this review. The form will be available online on our website.

A standard form will lead to benefits for retailers and customers. Retailers can accept medical confirmation forms that have been used with previous retailers, including those from interstate.

This reduces the burden on customers and makes it easier for retailers to confirm customers' medical status. Customers are more likely to have medical confirmation on hand when they switch retailers. This should mean more customers can provide confirmation up front and should reduce the number of reminder notices retailers need to send. We are also aware that medical practitioners have a high workload. A standard form used by all customers can make it easier for medical practitioners to complete.

Requiring medical confirmation to be no older than four years when provided to retailers will place an additional burden on life support customers. However, we consider this burden will be smaller than requiring updates to medical confirmation every four years for all customers.

⁵⁵ Essential Energy & SA Power Networks, op. cit., p. 23.

Yearly check-ins

Yearly check-ins may place some burden on life support customers, especially those who have not provided medical confirmation.

However, medically confirmed life support customers will only need to let retailers know that their life support equipment is still required. This is substantially less burdensome than requiring customers to provide updated medical confirmation every four years.

We acknowledge that retailers will face up-front and ongoing costs to design new communications, and to update its systems and processes. However, we also recognise that most retailers have existing systems to identify and notify customers, which could be leveraged for these processes.

We are also giving flexibility for retailers to conduct these check-ins anytime within a 12-month period. This allows retailers to find the lowest cost way to conduct annual check-ins.

We expect the number of yearly check-in notifications and medical confirmation reminder notices sent by retailers to decrease over time. Customers who no longer require life support equipment will be deregistered, meaning they no longer need notifications. Similarly, medically confirmed customers will not trigger additional medical confirmation processes. This is significantly less administratively burdensome and costly for retailers than a requirement to provide updated medical confirmation every four years, where the number of medical confirmation reminders would remain relatively constant over time.

In addition, we consider this reform will create incentives for retailers to deregister customers who do not provide medical confirmation, which further contribute to an accurate register.

Benefits of the new approach to medical confirmation

For industry, there will be substantial savings for distributors. This reform could reduce the number of redundant life support registrations. This would also reduce the size of life support registers. Distributors would also need to send fewer notifications during planned outages.

We consider this reform will provide improved data for emergency services by removing redundant contacts. During widespread outages, accurate life support registers can help emergency services focus their support to those who need it most. It is also costly and difficult to coordinate welfare checks if some customers no longer require life support equipment, or contact details are outdated.

Additionally, if a customer's condition worsens and they do not update their registration, emergency services cannot prioritise them appropriately during prolonged power outages.

When weighing the costs to industry against the benefits to life support customers and emergency services, we consider the benefits of yearly check-ins to outweigh the costs.

Our draft decision

We are proposing:

- the adoption of a standard medical confirmation form
- the requirement for retailers to conduct yearly check-ins with life support customers.

We are not proposing to require regularly updated medical confirmation. However, we propose requiring retailers to only accept a medical confirmation form that is less than four years old. This would apply when a customer initially registers or changes retailer.

We are not proposing to implement a cap on registrations without up-front medical confirmation.

Transitional arrangements – customer check-ins before the full rules take effect

We aim to improve the accuracy of life support registers, especially before the upcoming bushfire and storm seasons.

We propose that retailers undertake two check-ins before all rules come into effect on 1 December 2027. The first regular check-in takes place between 1 January 2028 and 31 December 2028.

The proposed transitional arrangement includes:

1. A check-in within 6 months from the publication of our final decision:

Retailers and exempt sellers would need to contact life support customers who were registered for more than 12 months as of 1 July 2026.

2. A yearly check-in between 1 January and 31 December 2027:

Retailers and exempt sellers would need to contact life support customers who were registered for more than 12 months as of 31 December 2026.

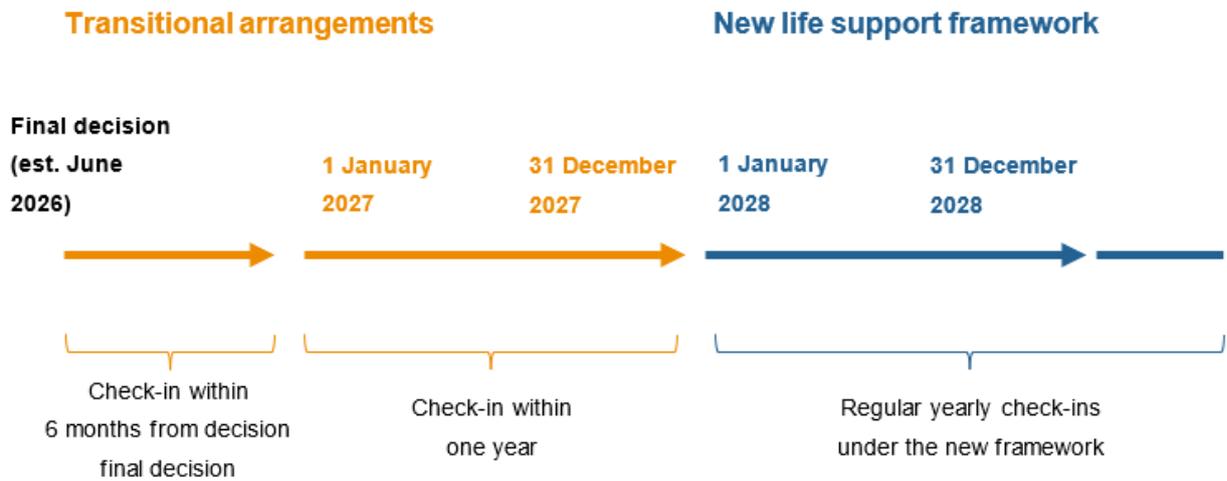
Retailers and exempt sellers can decide the specific date of its check-ins within those time ranges. We expect retailers to contact customers appropriately, but in a way that can prompt a response.

We note that AEMO's B2B systems will not have been updated, given the full reforms are not in effect until 1 December 2027. Therefore, for transitional check-ins, retailers will only need to ask a customer:

- whether a life support resident continues to reside at the registered premises, and
- whether life support equipment is still required at the premises.

If a customer confirms that it no longer requires life support equipment, the retailer or exempt seller must commence the existing deregistration process.

Figure 2: Transitional arrangements



Questions

6. Do you have any views on our proposal to update medical confirmation processes?
7. Do you have any feedback on mandating retailers undertake a yearly check-in process to update the information in their life support register?

Proposed improved communication requirements for contacting life support customers

Summary of draft decision

- The commission is proposing to require retailers, exempt sellers and distributors to accept customers' nominated secondary contact (potentially the life support resident) to receive communications about life support processes and outages, in addition to the life support customer.
- Customers may nominate a secondary contact person either through the proposed new medical confirmation form or by contacting their retailer directly.
- Under our proposed approach, retailers must allow life support customers and secondary contacts to nominate a preferred communication method, including electronic channels. Retailers must use those channels for communications about life support registration, deregistration and the updating of details. Existing communications rules for distributors will be maintained, with the addition of a secondary contact.

Introduction

This reform will improve communication methods and the quality of contact details data in life support registers to provide timely, clear and reliable information to customers.

The first part of this reform requires retailers, exempt sellers and distributors to accept customers' optional nominated secondary contact (potentially the life support resident) to receive outage notifications and communications related to life support protections. Currently, communications are only sent to the account holder, who may not be the person using life support equipment. This reliance on one individual can compromise safety, outage preparedness and emergency relief.

Retailers will need to share life support-related communications with the customer and the secondary contact person. This includes information on planned and unplanned outages, yearly check-ins, medical confirmation and the deregistration processes. We expect this will improve communication reach and responsiveness, reducing the risk of missed notifications.

The second part of this reform requires retailers to allow life support customers and secondary contacts to choose a preferred communication method to receive notifications and other information. This will include electronic communication channels, such as SMS and email, which can be more efficient.

For planned outages, distributors will still need to provide life support customers with hard copy notices. Any electronic communications will be additional.

Our preferred options to enhance life support protections for Victorian consumers

This reform also aims to align communication requirements in our codes. The Electricity Distribution Code of Practice already enables life support customers to nominate their preference and receive electronic communications.⁵⁶ Similarly, but not specifically for life support communications, the Energy Retail Code of Practice allows retailers to deliver information and notices to all customers electronically if they provide explicit informed consent. There are no similar provisions in the Gas Distribution Code of Practice.

These changes will increase customer agency, improve register accuracy and help life support customers to receive vital information when it matters most.

Notifications of planned interruptions

Clause 11.5.1(b)(ii)(A) of the Electricity Distribution Code of Practice specifies that before a planned outage, if a customer has chosen to receive electronic communications, the distributor must use that method and must additionally provide a hard copy notification.

Given the importance of a life support customer receiving notification of a planned interruption, we propose to retain this requirement.

Feedback received

Interested parties supported improving communication methods to better connect life support customers with the appropriate energy business during an outage.

Consumer groups supported reforms that improve communication methods for life support customers. The Consumer Action Law Centre, Westjustice, Energy Consumers Australia, and VCOSS supported the ability to nominate a secondary contact person.⁵⁷ CALC and Westjustice highlighted that SMS and email would be the most effective channels for planned outage notifications, alongside postal mail.

VCOSS and Energy Consumers Australia stressed the need for safeguards to protect First Nations communities and customers experiencing vulnerability, such as those affected by family violence.⁵⁸

Industry acknowledged the need for improved communication methods but expressed mixed views on nominating a secondary contact. AGL and Origin supported the ability for customers to nominate electronic communication channels, as they could enhance safety and preparedness

⁵⁶ [Electricity Distribution Code of Practice](#), clause 11.5.1(b)(ii)(A).

⁵⁷ Consumer Action Law Centre & Westjustice, op. cit., p. 19; Energy Consumers Australia, op. cit., p. 18.

⁵⁸ Energy Consumers Australia, op. cit., p. 18; Victorian Council of Social Service, op. cit., p. 7.

Our preferred options to enhance life support protections for Victorian consumers

during outages.⁵⁹ Origin also recommended considering notifications for unplanned outages, especially those lasting longer than four hours.⁶⁰

Retailers also cautioned of the need for privacy and consent safeguards, especially in circumstances of family violence.⁶¹

Engie stated that existing processes already allow for additional contacts and that further regulation would not improve outcomes for customers as current practices regarding notifications via post, email or SMS would be sufficient.⁶²

Both the Department of Health and the AER supported improving communication channels for life support customers.⁶³ Both advocated for allowing life support customers to nominate a secondary contact and supported the use of electronic communications. The department also stated that secondary contacts should receive communications about planned and unplanned outages.

Analysis

The key focus of the reforms proposed in this chapter is to ensure that life support customers consistently receive timely information, especially in case of a prolonged power outage. Each proposed reform could be implemented independently. We have therefore considered them as discrete options. We have considered the benefits and costs of each reforms against the base case.

Enabling customers to nominate a secondary contact person

Currently, some retailers allow customers to nominate a secondary contact while others do not. Additionally, distributors are not required to collect this information. This leads to inconsistency for customers, distributors and emergency services. Some of this inconsistency may be hidden from a life support customer who nominates a secondary contact with their retailer, unaware that their distributor does not collect this data.

Furthermore, an account holder (who is the life support customer) may not be the life support resident (the person who uses the life support equipment). For example, the life support resident may be a child or the partner of the account holder. This can hinder contact with a life support

⁵⁹ AGL, [submission to AEMC Rule Change](#), 4 September 2025, p. 8.; Origin, op. cit., p. 9.

⁶⁰ Origin, op. cit., p.9.

⁶¹ AGL, op. cit., p. 8; EnergyAustralia, op. cit., p. 6.; Origin, op. cit., p. 9.

⁶² Engie, op. cit., pp. 3–4.

⁶³ Department of Health, op. cit., p. 33; Australian Energy Regulator, [submission to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria – Consultation Paper'](#), 4 September 2025, p. 2.

Our preferred options to enhance life support protections for Victorian consumers

resident when the account holder is unavailable or during a prolonged outage. Nominating a secondary contact reduces these risks.

Improving communication requirements

Retailers will have to allow life support customers to choose a preferred method of communication. This includes electronic communication channels, such as SMS and email. Secondary contacts can also nominate their preferred contact method.

Retailers will be required to use this method for notifications concerning life support protections, such as yearly check-ins and medical confirmation reminders. Distributors will still need to send a hard copy notification for planned interruptions.

Life support customers can nominate a secondary contact person in the medical confirmation form or by contacting their retailer directly. Both life support customers and their secondary contacts can choose or update their preferred contact method in the medical confirmation form or by contacting their retailer.

Costs and benefits of implementation

Both proposed reforms will involve some one-off and ongoing costs to energy businesses. However, we consider that these are outweighed by the benefits of more reliable communications with life support customers, both for regular communications and during emergencies.

A secondary point of contact gives emergency services a backup option to communicate critical information and conduct support checks during prolonged outages. This may be a large benefit. Emergency services may end up spending fewer resources contacting life support customers during an emergency. Life support customers are more likely to receive important information.

Ensuring life support customers and secondary contacts can nominate a preferred method of communication, and requiring energy businesses to use it, will:

- increase the likelihood that life support customers receive messages, especially in a timely manner for important communications
- reduce the burden on customers of receiving regular notifications in a format that is less suited to their needs.

We also believe this will increase the likelihood of receiving a response from life support customers when required, such as during a yearly check-in. We expect a life support customer to be more likely to respond to a retailer using their preferred communication method. A secondary contact can remind a life support customer to update their details and help them action requests for updated medical confirmation, yearly check-ins and deregistration if life support is no longer required. Combined, we expect these reforms to contribute to higher rates of medical confirmation

Our preferred options to enhance life support protections for Victorian consumers

and a reduction in the number of customers on life support registers who no longer need protections.

Costs to energy businesses include updating IT systems to record secondary contact information, communication preferences, issuing additional notifications and new staff training. They will also need to review their existing procedures to manage privacy and family violence risks when engaging with secondary contacts.

A diverse range of interested parties supported allowing life support customers to nominate a secondary contact and preferred contact method. The costs to business are outweighed by the benefits to customers and emergency services of more timely communications, especially during emergencies.

Our draft decision

We propose requiring retailers to record the contact details of a secondary contact for life support customers. Customers can provide these details directly to the retailer, or through the proposed standard medical confirmation form. It will be optional for life support customers to provide these details. Retailers will have to share relevant information with secondary contact persons.

We also propose that energy businesses must use a life support customer's and secondary contact's preferred communication method for communications relating to life support. This includes electronic methods, where explicit informed consent has been given.

Questions

8. Do you have any views on our proposed approach to enable the nomination of a secondary contact person to receive communications in addition to a life support customer?
9. Do you have any views on our proposal to mandate energy businesses to collect and use a life support customer and secondary contact's preferred communication method (including electronic communications)?

Implementation

Summary of proposed implementation

- Retailers will have six months from 1 July 2026 to conduct an initial check-in with all customers in their life support registers. Retailers will conduct the first yearly check-in on 1 January 2027.
- All other reforms will commence on 1 December 2027.

In our consultation paper, we considered an implementation period of 18 months from the publication of our final decision. This was determined as a suitable timeframe for the IEC, retailers and distributors to update B2B systems. We continue to propose that timeline for most reforms, with an implementation date of 1 December 2027.

However, we consider that check-ins to ask life support customers whether life support equipment is still required could leverage existing system and processes. We are proposing an initial six-month period for retailers to check-in with life support customers from 1 July 2026, with regular check-ins commencing from 1 January 2027.

Feedback received

Many interested parties agreed with an 18-month implementation timeline for most reforms. A few suggested a longer timeline due to the complexities of the reforms and other parallel reforms.

Consumer groups emphasised that any implementation timelines should not compromise consumer protections.⁶⁴ They cautioned that within our suggested timeframe, some reforms could place a higher burden on consumers. However, most of these concerns related to the requirement for updated medical confirmation, which we are not proposing to progress. Energy Consumers Australia warned that the suggested timeframe could pressure households and medical practitioners to develop backup plans.⁶⁵ The Consumer Action Law Centre also suggested an expedited timeline of 12 months for some requirements for energy businesses.⁶⁶

⁶⁴ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), Consumer Action Law Centre, op. cit., p. 21 Victorian Council of Social Service, op. cit., p. 9

⁶⁵ Energy Consumers Australia, op. cit., p. 4.

⁶⁶ More details about CALC's suggestions can be found on page 21 of their submission. Consumer Action Law Centre, op. cit., p. 21.

The Information Exchange Committee (IEC), responsible for implementing any business-to-business processes, agreed with the late 2027 implementation date.⁶⁷

Industry also favoured an implementation date of late 2027, citing changes to B2B processes and alignment with the IEC as their main reasons.⁶⁸ AusNet, CitiPower, Powercor, and United Energy agreed with this date, citing alignment with AEMO's B2B reforms.⁶⁹

AGL and Jemena considered our suggested timeline was too short and instead suggested a two-year implementation date.⁷⁰ Jemena stated that the proposed timeline would be inadequate given the scale and complexity of the reforms. Additionally, it also claimed the proposed reforms overlapped with several other major reforms.

Updated guidance

Our [Guideline 2 \(2022\): Life support customer details](#) clarifies what life support customer details must be recorded in registers. It also recommends additional details energy businesses can collect. The guideline contains other important requirements related to registration and deregistration, including record-keeping. If we proceed with the proposed reforms, this guideline will need to be updated. We will do this after publishing our final decision.

Our [Compliance and Performance Reporting Guideline](#) sets out the process for retailers to self-report non-compliance. It also requires retailers to report on a range of performance metrics. Following the completion of this review, we will review and update the Compliance and Performance Reporting Guideline. This may include reporting on indicators such as the total number of life support customers with a life-threatening condition, the number of new life support registrations with a life-threatening condition identified, the total number of life support customers registered with and without medical confirmation and the successful response rate of the yearly check-in which would support assessing the effectiveness of the proposed change.

Implementation dates

We are proposing a two-staged commencement of the rules, with an initial transition period. This will provide retailers and distributors with sufficient time to implement changes that require IT

⁶⁷ Information Exchange Committee, [Submission to Essential Services Commission 'Better Protections for Life Support Customers in Victoria'](#), 4 September 2025, p. 1.

⁶⁸ [Submissions to the Essential Services Commission 'Better Protections for Life Support Customers in Victoria: Consultation Paper'](#), Origin, op. cit., p. 7, Red and Lumo, op. cit., p.3, Shell, op. cit., p. 2.

⁶⁹ AusNet, op. cit., p. 9, Citipower, Powercor, United Energy, op. cit., p. 10.

⁷⁰ AGL, op. cit., p. 6; Jemena, op. cit., pg. 17.

Implementation

system updates. It will also start to increase the accuracy of life support registers by undertaking yearly check-ins.

The table below presents the stages for the implementation of these reforms:

Implementation stage	Proposed reforms	Proposed implementation date
Transitional arrangements <i>If a customer notifies their retailer they no longer require life support equipment, the retailer must deregister the customer, following the current deregistration process.</i>	One check-in within six months of our final decision	1 July to 31 December 2026
	One yearly check-in	1 January to 31 December 2027
Full framework	All other reforms, including yearly check-ins in 2028	From 1 December 2027

Transitional arrangements until 1 January 2027

Under the proposed approach, from 1 July 2026 retailers and exempt sellers will be required to start contacting customers currently on their life support registers.

Retailers will be required to undertake two check-ins within this transitional period:

- one within 6 months from our final decision, and
- one between 1 January and 31 December 2027.

During this transitional period, retailers will only need to ask a customer whether a life support resident continues to reside at the registered premises, and if they still require life support equipment. Retailers already need to contact customers regularly for a variety of reasons, including sending medical confirmation reminders. They can leverage existing systems for these check-ins.

Retailers must update customer contact details and deregister those customers who have vacated the premises or no longer require life support equipment.

We expect this will improve the accuracy of life support registers and ensure that emergency agencies can receive more accurate data during emergencies. This is especially important for upcoming bushfire and storm seasons.

Implementation

Our proposed approach will likely reduce ongoing administrative and economic burden on retailers and exempt sellers. Following these initial check-ins, we expect there will be fewer customers on life support registers when the remaining rules come into effect on 1 December 2027.

All other reforms to commence on 1 December 2027

From 1 December 2027, following AEMO's updates to B2B processes, all other reforms would come into effect. All energy businesses will need to have updated their systems and staff training to accommodate the new fields and data (secondary contact information, communication preferences and life-threatening condition flag) by this time. They will also need to have made available the standard medical confirmation form on their respective websites.

By this date, distributors will also need to have prepared new processes for handling life support customer registration requests (that is, notifying retailers) and redirecting life support customers to their retailer if they are requesting an update to their details.

We acknowledge there are potential complexities in the implementation of these reforms. However, we consider 1 December 2027 strikes the balance we aim to achieve. It allows energy businesses time to implement changes, while ensuring life support customers benefit from life support protections as soon as reasonably possible. It also supports emergency agencies to improve emergency triage in Victoria. We note that many interested parties, including the Information Exchange Committee, supported an implementation date of late 2027.

Questions

10. Are there any additional costs and benefits that we should consider for the proposed reforms?
11. Are there any additional implementation issues we should consider for each proposed reform?
12. Do you have any feedback on the proposed implementation timeframes for the proposed reforms?

Next steps

Indicative timeline

The key dates for this review are:

- Consultation period for the draft decision: 5 March to 16 April 2026.
- Final decision and amendments to the codes of practice: expected June 2026.

How to provide feedback

Submissions should be made via [Engage Victoria](#) by **5 pm on 16 April 2026**.

Submissions will be published on the commission's website, except for submissions, or any information that is identified by the submitting party as commercially sensitive or confidential, in accordance with our [Submissions Policy](#).

Submissions should clearly identify which information is sensitive or confidential, and the basis for the claim.

We are also open to meeting with interested parties to discuss specific feedback. We will continue to proactively engage with the community, industry, government departments and agencies through individual meetings as this review progresses.

Please contact energyreform@esc.vic.gov.au if you have any questions or would like to arrange a meeting.