



Life support customers — draft decision

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1 Summary

CitiPower, Powercor and United Energy welcome the Essential Service Commission of Victoria's (**ESCV**) draft decision to strengthen and clarify protections for customers who require life support equipment.

Generally, we support the ESCV's proposed changes to the Electricity Distribution Code (**EDC**) to strengthen protections for life support customers and align Victoria's regime with that contained in the National Energy Retail Rules (**NERR**). However, we have some concerns with some aspects of the proposals.

We have over 20,000 registered life support customers. Over 5,600 of these have been added since February 2019, and only 22.4% of these have been medically confirmed. This exponential growth in life support customers will impact our ability to prioritise genuine, medically confirmed life support customers. If the ESCV's proposed changes to protections for life support customers are adopted in their current form, our life support customer register will continue to increase.

In summary, we consider that the EDC should:

- **require that medical certificates be supplied** by life support customers to confirm their status, as it is essential to the integrity of the life support customer register and an important aspect of the alignment with the NERR
- **improve customer experience** so that distributors have the option to reduce the planned outage notification window with the consent of a life support customer, or any other customer, through Rule 90 of the NERR being brought in full into the Distribution Code
- **adopt the life support registration and de-registration provisions** in the NERR, and strengthen these provisions to require distributors and retailers to deregister a life support premise following notification from the Registered Process Owner
- **explicitly recognise digital notifications** as a valid form of written notification to life support customers.

Given the time available, we may make a subsequent submission that explicitly comments on the drafting of the amendments to the EDC provisions relating to life support customers.

2 Medical certificates

- The requirement for life support customers to confirm their status with a medical certificate must continue and be strengthened
- Only 22.4% of our life support customers that have registered since February this year are medically confirmed
- Since February this year, we have had 5,663 new life support customers
- We have over 20,000 registered life support customers
- Medical certificates are required under the NERR
- Our life support register will continue to grow unabated without a requirement for medical certificates
- Distributors should not have discretion over which life support customers require a medical certificate
- Medical certificates should be required to be refreshed every two years

The ESCV discusses taking customers at their word that they require life support equipment. We do not consider that this approach is appropriate, for the reasons discussed below.

2.1 Medical confirmation must be maintained

2.1.1 Align with the NERR

The NERR has been used by the ESCV to guide the changes to the EDC to strengthen protections for life support customers. Removing the requirement for a medical certificate would place Victoria at odds with the national framework for managing life support customers. The NERR requires the provision of a medical certificate for life support customer status in all circumstances.

The NERR was updated in 2017 to include clarified protections for life support customers. It did not remove the requirement for life support customers to confirm via a medical certificate.¹ As such there is no precedent for removal of the medical certificate requirement in the EDC.

2.1.2 Continued growth of life support customer register

Without a medical certificate requirement, we can expect our life support customer registers to further expand with the addition of many more unconfirmed life support customers. We currently have 20,110 registered life support customers across our three businesses.² Over 5,600 new life support customers have been added to our register since February 2019. Of those new customers, only 22.4% have been medically confirmed.³ The remaining life support customers have not provided medical confirmation.

¹ Australian Energy Market Commission, Final Rule Determination – National Energy Retail Amendment (Strengthening protections for customers requiring life support) Rule 2017, 19 December 2017.

² Per Appendix A, 1,761 for CitiPower, 11,303 for Powercor and 7,046 for United Energy.

³ Per Appendix A, 13.7% of life support customers were medically confirmed for CitiPower, 18.1% for Powercor and 29.5% for United Energy.

Removing the requirement to prove entitlement to be a life support customer removes any barrier from non-genuine customers registering as requiring life support. We already experience a large number of non-genuine customers registering as life support customers including:

- a chicken fast food shop
- thirty five National Meter Identifiers (**NMIs**) registered as life support against the same customer, who physically cannot be living at all thirty five addresses at the same time
- a soccer club
- a government department
- several churches
- several veterinary clinics
- a kickboxing gym
- several cafes and restaurants
- lighting for common areas in apartment complexes
- a car yard
- a yacht club.

The life support customer provisions are intended to support the most vulnerable members of society with managing the physical loss of electricity to their medical equipment. With an increasing register, we wish to prioritise the genuine life support customers in managing our network outages.

There are various reasons why a customer who does not rely on life support equipment may seek to be registered as a life support customer. The growing and inaccurate register is increasing the cost of administering life support arrangements and is detrimental to all customers.

2.1.3 Conducting welfare checks

On occasion if there is any uncertainty regarding the status of a life support customer that may have been impacted by an outage, we may request police to conduct an onsite welfare check. Police may attend the registered life support premises, and check if the life support customer is coping with the outage. Where customers do not genuinely require power for life support equipment, this creates an unnecessary and inappropriate drain on public resources.

Requiring medical confirmation of life support status will minimise the waste of resources, both public and privately owned, as it increases the likelihood of welfare checks being conducted on only genuine life support customers.

2.2 Clear rules rather than discretion required

Registered medical practitioners are qualified to make a judgement on the need for medical certificates and life support arrangements for customers. Energy businesses are not qualified to have discretion over which customers should or should not provide medical certificates.

A consistent approach must apply to all customers, where a medical certificate must be supplied in order to obtain and retain life support customer status consistent with the customer's medical practitioner's advice.

2.3 Refreshed medical certificates every two years

To help preserve the integrity and accuracy of the life support register, medical certificates should be required to be refreshed every two years in order for the customer to retain life support status. It is our experience the affected life support customers can often pass away, move into an aged care facility or otherwise no longer require life support. In these instances, we are often not told and the customer remains on the register – in some cases for many years.

In our 2018 annual mail out to registered life support customers, we asked them to inform us, via a form with a reply paid envelope, whether they still require life support. Of the forms we sent out, 62% were not returned and of the 38% who did, 18% advised they in fact did not use life support equipment.⁴

The poor response rate together with the very low rate of medicate certificates provided suggests that a large proportion of those registered are either not genuine life support customers or that their account status has changed over time. A requirement to provide renewed medical certificates supported by a follow-up process would ensure greater data accuracy, and therefore ensure that we prioritise those genuine life support customers.

We suggest that a requirement for customers to submit on a bi-annual basis a refreshed medical certificate is introduced to ensure that only customers who still require life support are maintained on the register.

⁴ See Appendix A for statistics of our 2018 mail out.

3 Planned outages with consent

- Distributors should be able to obtain consent for a planned interruption to occur within a date range or on a specified date from all affected customers, including life support customers
- Rule 90 of the NERR should be adopted in its entirety, and is unworkable if only adopted in part
- Explicit “informed” consent needs to be defined
- The proposed record keeping requirements will require us to invest in new technology

In draft decision 9, the ESCV proposes to include an additional clause in the EDC that requires distributors to provide life support customers with the option of providing explicit informed consent for a planned interruption to occur on an earlier specified date. Distributors would be required to keep records of this for at least two years.

We discuss why this protection is inoperable on its own, and should be extended to all customers.

3.1 Unworkable to adopt only part of Rule 90

The ESCV's draft decision 9 appears to propose to adopt subrule 90(1)(c) of the NERR in isolation. This is unworkable for distributors.

Subrule 90(1)(c) of the NERR provides an opportunity for a life support customer to bring forward the specified date of a planned interruption. This would only be possible where the planned work does not impact any other customers. Such activities typically would include routine meter testing and asset replacement affecting a single customer.

For planned maintenance, repair or augmentation works on the distribution system, we typically notify about 30–50 customers per planned outage.⁵ In such instances, it will not be practical to bring forward the specified date of a planned interruption for a life support customer, as a shorter timeframe may not be acceptable to the other customers.

Example scenario #1:

In December 2019, CitiPower needs to conduct maintenance on the network, which will affect 40 customers. CitiPower, in compliance with the EDC, notifies all 40 customers on 5 December 2019 that the planned outage will occur on 10 December 2019.

One of the 40 customers is a life support customer. They request to bring forward the planned outage date to 7 December 2019. CitiPower is required to oblige under the EDC. CitiPower brings forward the outage date to 7 December 2019 per the life support customer's request.

CitiPower is unable to provide the remaining 39 affected customers with the requisite four days' notice under cl. 5.5.1 EDC, as the new outage date is two days away. CitiPower report this breach to the EDC per the Compliance and Performance Reporting Guideline, and may potentially be issued with a penalty under the Energy Industry Penalty Notice regime.

⁵ For FY19, we notified an average of 33 customers per job for CitiPower, and an average of 53 customers per job for Powercor.

We believe Rule 90 of the NERR as a whole is more flexible than the current clause 5.5.1 of the EDC as it also allows distributors, with the explicit consent of the customer, to arrange for an interruption on any day within a date range of five business days, or on a specific date for non-life support customers. This will have the dual benefit of providing distributors with flexibility whilst simultaneously improving convenience for customers.

However, we emphasise that bringing across only subrule 90(1)(c) of the NERR in isolation would make the notification system unworkable.

3.2 All of Rule 90 of NERR should be adopted

Rule 90 of the NERR allows distributors to arrange a planned interruption to occur within a date range or on a specified date with the consent of affected customers, including life support customers. This Rule, if adopted in its entirety, is workable for distributors and can provide benefits to all customers.

Subrule 90(1)(c) allows life support customers to provide consent to a distributor to bring forward a planned interruption that would affect them to a specified date. Subrule 90(1)(b)(ii) allows for other customers, who are not life support customers, impacted by that same interruption to provide consent to a distributor for the same outage to occur on a specified date. Therefore, all customers impacted by a planned outage can provide consent for the outage to occur on a specified date.

This Rule may provide a better experience for customers who, instead of having to make alternative arrangements during a possible planned outage for which they have received four days' notice, could benefit from an earlier opportunistic outage. For example, work crews in the area who have some spare time between jobs may request access of a customer, who may agree. With the customer's agreement, necessary works could be undertaken there and then, rather than on a later date for which the customer has received four days' notice. This would be of great benefit to customers who happen to be home to grant access, who would then not be required to be home at a later date.

Customers may benefit by clearer expectations about the outage window as well as lowering our costs in undertaking planned outages which will ultimately lower network tariffs. Additionally, it would facilitate efficient processes for new basic connections, connection alterations and supply abolishment and avoid delays.

3.3 Explicit “informed” consent

We query the meaning of explicit “informed” consent in draft decision 9. The ESCV has offered no definition of what may comprise informed consent. We note that this could amount to a requirement to ensure non-English speaking customers are offered a translation service in order to provide explicit informed consent to works going ahead. Equally, we query what would happen where a customer is not mentally or physically capable of providing explicit informed consent due to disability or other impediment.

The ESCV should provide distributors with clarity on the meaning of explicit informed consent.

3.4 Record keeping requirements

We note that draft decision 9 requires distributors to keep record of a life support customer's explicit informed consent for two years, which aligns with subrule 90(1A) of the NERR.

Currently, we do not have the IT systems in place to record this information electronically. There will be a transition period while we invest and implement IT solutions to store the data.

4 Registration process

- We support adopting the NERR registration and deregistration provisions into the EDC
- By the end of the transitional period, we seek all life support customers to provide medical confirmation

In draft decision 11, the ESCV proposes to align with the NERR in relation to registering and de-registering customers. We support this proposal for the reasons set out below.

4.1 Process will lead to enhanced protections for life support customers

We support adopting the NERR registration and deregistration provisions for the benefit of life support customers.

The NERR provides a more robust framework than is currently in the EDC. We consider that providing customers' protection from when they first notify their energy business that they require life support is a fair and reasonable way to ensure all life support customers are protected.

4.2 Deregistration of life support premises

The NERR provisions allow deregistration of a life support customer premises in the following circumstances:

- failure to provide a medical certificate: only the Registration Process Owner can deregister a life support customer if they fail to provide a medical certificate⁶
- change of circumstance: if the customer or their representative contacts the retailer or distributor to advise of a change in circumstance, then that party can commence the deregistration process⁷
- customer changes retailer: the distributor can commence deregistration of the premises when it becomes aware that the customer has transferred to a new retailer.⁸

We understand from other distributors in other states of situations where the customer has advised of the change of circumstances (life support is no longer required), the distributor has deregistered the premises however the retailer is not similarly de-registering the premises. Consequently, a mismatch between the registers of life-support premises will arise when the quarterly comparison is undertaken. The distributor will then be required to manually update their register to re-include the premises, which may trigger the sending of a welcome pack to the life support customer. This is despite the B2B process, through the Life Support Notification (**LSN**) transaction, allowing both parties to see the reason behind the deregistration and an appropriate audit trail.

These communications, after the distributor has been notified by the life support customer or their representative that the life support flag is no longer required, may be both inconvenient and insensitive.

We therefore recommend that the EDC strengthen the provisions in the NERR to require the other party (distributor or retailer) to deregister a life support premise following notification from the party originally contacted by the customer.⁹

⁶ Refer NERR subrule 125(4) and 125(5)

⁷ Refer NERR subrule 125(9) and 125(10)

⁸ Refer NERR subrule 125(14).

⁹ Refer NERR subrule 125(11) and 125(12).

5 Notifying customers

- Electronic communication should be the primary/default communication channel with life support customers for planned outages
- The penalty for non-compliance with planned outage notification obligations for life support customers should be compensation payments to affected customers

5.1 Electronic communications with life support customers should be the default

Communicating with life support customer in a way that ensures convenience, flexibility and timely provision of information is a priority for us.

Our customers increasingly prefer digital channels (i.e. online, email or SMS) as their preferred form of communication. This has been communicated to us through feedback from our customers as well as a literature review of energy customers' preferences which we recently commissioned (see appendix).¹⁰ In contrast, many aspects of the EDC still require us to interact with customers via hardcopy written communication.

AusGrid undertook a customer survey in November 2017 which found that life support customers overwhelmingly prefer to be contacted via text message when there is an unexpected loss of power.¹¹

We believe the EDC should be modernised to allow for electronic communication to be the default customer communication channel for all customers, including life support customers. We also recognise that not all customers wish to receive digital notifications, and so support providing customers the option to continue to receive hard-copy written communications.

In addition to meeting customer expectations, this will allow us to provide life support customers with the most up-to-date information possible in a convenient, timely, efficient, and cost-effective manner.

These arguments apply equally to life support and non-life support customer communications. Please see section 2 of our submission to the EDC review Issues Paper for further information on this matter.¹²

5.2 Penalties for failure to provide 4 day planned outage notification

We are subject to penalties if we fail to comply with the obligation to provide each affected customer with at least four business days written notice of a planned interruption. The penalties, under s 54I of the Essential Services Commission Act 2001 (Vic)¹³ and regulation 9 of the Essential Services Commission (Energy Industry Penalty Regime) Regulations 2016 (Vic)¹⁴, are \$10,000 for non-life support customers or \$20,000 where the customer is a life support customer.

These penalty payments are not paid to affected life support customers. Rather, the penalties are paid by distributors to the ESCV. A more appropriate penalty for failure to notify of planned outages would be akin to a

¹⁰ Dr Robyn Stokes, Literature Review: Energy customer preferences, communication trends and regulatory requirements: proposed amendments to Victoria's Electricity Distribution Code (EDC), June 2018.

¹¹ AusGrid, Life Support Customer Survey Results, November 2017.

¹² CitiPower, Powercor and United Energy. Electricity Distribution Code - Issues Paper, submission, 13 September 2019.

¹³ *Essential Services Commission Act 2001*. No. 62 of 2001. Authorised Version incorporating amendments as at 7 June 2016, section 54I, p 63.

¹⁴ *Essential Services Commission (Energy Industry Penalty Regime) Regulations 2016* S.R. No. 48/2016, regulation 9 p 4.

GSL payment to the affected customer which would seek to compensate for poor service and any inconvenience caused.

6 ESCV questions

In this section, we respond to the ESCV stakeholder questions.

1. Life support customer numbers - we are seeking energy businesses to provide us with information about the number of life support equipment customers who are currently registered with retailers, distributors and exempt persons.

As shown in appendix A, we currently have 20,110 registered life support customers. Of this, 1,761 are in CitiPower, 11,303 are in Powercor and 7,046 are in United Energy.

We note that our register has increased by 8,800 customers since July 2016, with 5,622 of those customers being added since February 2019.

2. Feedback on implementing the national rules - we are seeking stakeholder views on whether there have been challenges implementing the life support obligations in other jurisdictions that we may need to consider.

We have liaised with non-Victorian distributors to understand their challenges in implementing the national life support obligations. We have received the following feedback:

- life support registration has been used as a selling point by third party sales channels, trying to convince customers that by switching retailers and registering their power will be more guaranteed
- retailers continue to take a risk adverse approach, both by offering new customers the opportunity to sign up as life support customers when they first register, and also by failing to remove life support customer flags when advised by the distributor or the customer to do so. This has resulted in a significant increase in registrations and decrease in de-registrations, rendering a highly inaccurate life support customer register containing high volumes of non-genuine or outdated cases which in turn diverts administration and management effort away from legitimate cases
- there have been significantly higher numbers of B2B transactions initiated by retailers via automated B2B systems with minimal auditing processes deployed, causing challenges in monitoring data integrity and customer experience (e.g. many life support customers have their phone contact details listed as '00000' or customers being subject to a circular process of being deregistered and registered repeatedly)
- the risk averse automated solutions can result in the customer contacting/being contacted by both parties (retailer and distributor) to confirm registration or deregistration, which can then cause unintended negative impacts such as distressing grieving family members who have previously advised their deceased kin should be removed from the register
- customers are receiving duplicate and/or conflicting correspondence from their distributor and retailer.

3. and 4. Requirement for customer to provide medical confirmation - we are seeking stakeholder feedback on whether or not retailers, distributors and exempt persons must obtain medical confirmation from life support customers, or whether the commission should give energy businesses the discretion to require medical confirmation from life support customers.

As discussed in section 2, we consider that the medical certificate confirmation requirement must be maintained to safeguard the integrity and accuracy of the life support customer register.

The life support customer protections exist for the purpose of protecting customers who genuinely need life support equipment. Confirming this status with a medical certificate or medical confirmation is an appropriate and legitimate way to ensure this system is not taken advantage of by customers who do not genuinely require life support.

In our network, we have had fast food restaurants, veterinarians, soccer clubs and yacht clubs register as requiring life support, presumably due to a perception that doing so will reduce their chances of experiencing an outage. We have also seen a rise in low socio-economic customers knowingly registering for the purpose of not being de-energised when they are unable to pay their bills. Considering the Victorian Government's many initiatives to help customers with difficulty paying their bills,¹⁵ we consider that registering only to avoid being de-energised upon non-payment is against the spirit and intent of the life support protections.

We note the ESCV has alternatively presented an option whereby the registration process owner has discretion as to whether or not it will require the customer to provide medical confirmation. We consider that this is a discriminatory approach, where certain customers could be favoured over others. We further question what parameters the ESCV considers distributors should use to decide who to require a medical certificate from. Where these distinctions could be made on the basis of socio-economic status, geographical area, race or community group, this approach is discriminatory.

Where we experience an unplanned outage and we are unable to get in touch with a life support customer by phone, we call the local police station and ask them to do a welfare check. This is a use of public resources that should only be reserved for genuine life support customers.

We further consider that verified life support customers should have to obtain a new medical certificate every two years in order to stay on the life support customer register. This would ensure the ongoing robustness of the life support customer register, and would enable the removal of life support customers who no longer require life support, who have moved away or who are deceased.

5. Requirements on collecting and disclosing information - we are seeking stakeholder feedback on whether our codes should include specific obligations to seek consent from customers and persons residing at the premises (as applicable) before collecting and disclosing information about life support equipment to other energy businesses.

We consider that a requirement for consent before sharing a customer's data with other energy businesses could lead to further inaccuracies between retailers and distributors registers.

6. Retailer interruption provisions for exempt sellers - we are seeking stakeholder feedback on whether or not we should include provisions to cover situations where exempt sellers would interrupt a customer's supply.

We support retailer interruption provisions being applied to exempt sellers to protect life support customers living in embedded networks.

¹⁵ For example, the Victorian Default Offer, Victorian Energy Compare, Energy Fact Sheets, payment difficulty programs, energy concessions, the Solar Homes Package, and the Utility Relief Grant Scheme run by the Department of Health and Human Services.

7. Should distributors be allowed to de-register some life support customers? We are seeking stakeholder views on whether distributors should be able to de-register life support customers when they are not the registration process owner.

As discussed in section 4.2, we support distributors being able to deregister life support customers when the distributor is not the registered process owner.

The ability of the distributor to deregister a life support customer exists in the NERR where the distributor becomes aware that the customer has subsequently transferred from another retailer at that premises. Provided the distributor has complied with the written notification requirements in subrule 125(14)(a), the distributor can then deregister the customer.¹⁶ We consider that this would improve the integrity of the life support customer register by giving the distributor a mechanism to remove unconfirmed life support customers who have changed retailers, and for whom there is no registered process owner.

8. Timely notification of life support customers - we are seeking stakeholder views on the obligation to notify the other party within one business day.

We support creating an obligation on the registration process owner to notify the other party of a customer requiring life support equipment within one business day. We already notify the other party instantaneously in near real time through B2B processes and consider that codifying this as a requirement of one business day will benefit life support customers.

9. Updating life support registers in a timely manner - we are seeking stakeholder views on the obligation on retailers, distributors and exempt persons to update their life support registers within one business day.

We already update our registers in near real time upon being notified of a change to life support customer status. We support this obligation which is codification of current practice. We consider it will ensure registers are up to date, for the benefit of life support customers.

10. Registration process owner in embedded networks - we are seeking stakeholder views on our approach of requiring the exempt seller to always be the registration process owner.

N/A

11. Registration process owner in embedded networks - we are also interested to know from embedded network operators, the number of residential customers who have left their embedded network and are sold electricity by a licensed retailer? Does the commission need to account for these on-market embedded network customers in the design of the new life support obligations?

N/A

¹⁶ NERR subrule 125(14).

12. Registration process owner in embedded networks - is there merit in the commission considering the alternative approach outlined in section 6.2? If so, please provide reasons why these obligations would be needed. We also would like to know if an on-market customer, who is registered as requiring life support equipment, would be protected against disconnection in the event that the licensed retailer at the gate meter disconnected the exempt seller. Additionally, we would like to know if licensed distributors will notify the on-market customer about planned supply outages.

N/A

A Life support customer statistics

A.1 Growth of life support customers

Table 1 Number of registered life support customers

	CP	PAL	UE	Total
Jul-16	1,104	6,203	4,003	11,310
Jul-17	1,139	7,017	4,516	12,672
Jul-18	1,462	9,077	5,586	16,125
Jul-19	1,666	10,573	6,719	18,958
Sep-19	1,761	11,303	7,046	20,110

Source: CitiPower, Powercor and United Energy

A.2 Medical confirmation for life support customers

Below is a record of life support customers who have registered since 3 February 2019 who have provided a medical certificate.

Table 2 Medically confirmed and unconfirmed life support customers

	CP		PAL		UE		Total	
	Volume	%	Volume	%	Volume	%	Volume	%
Medical confirmation	59	14%	527	18%	684	30%	1,270	22%
No medical confirmation	373	86%	2,389	82%	1,631	70%	4,393	78%
Total	432	100%	2,916	100%	2,315	100%	5,663	100%

Source: CitiPower, Powercor and United Energy

A.3 Mail out results

Below are the statistics from the September 2018 annual mail out to a subset of our registered life support customers (new life support customers who had recently received a welcome pack were not included). Customers were asked to return the form in the provided reply paid envelope advising us of whether they still require life support.

Table 3 Forms sent out as part of the life support customer annual mail out

	CP		PAL		UE		Total	
	Volume	%	Volume	%	Volume	%	Volume	%
Forms returned	416	29%	3473	39%	2158	38%	6047	38%
Forms not returned	1013	71%	5365	61%	3464	62%	9842	62%
Forms sent out	1,429	100%	8,838	100%	5,622	100%	15,889	100%

Source: CitiPower, Powercor and United Energy

Table 4 Forms returned following the life support customer annual mail out

	CP		PAL		UE		Total	
	Volume	%	Volume	%	Volume	%	Volume	%
Life support confirmed	293	70%	2841	82%	1667	77%	4801	79%
Life support was cancelled	109	26%	542	16%	430	20%	1081	18%
Life support was not confirmed or cancelled	14	3%	90	3%	61	3%	165	3%

Source: CitiPower, Powercor and United Energy