

3 September 2025

Essential Services Commission

Level 8, 570 Bourke Street

Melbourne VIC 3000

Submitted through [Engage Victoria Website](#)

To whom it may concern,

Submission on “Better Protections for Life Support Customers in Victoria” Consultation

Energy On, as an Embedded Network and Local Energy Network Operator in Victoria, appreciates the opportunity to provide feedback on the consultation paper “Better protections for life support customers in Victoria” by the Essential Services Commission (ESC).

We strongly support initiatives aimed at strengthening the protections for life support customers, including improving the accuracy of life support registers, targeting support to those with the most critical needs, and enhancing communication.

While we support these initiatives, we would like to highlight some key challenges faced by exempt sellers that must be considered. It’s essential that any changes recognise the operational differences between embedded networks/local energy networks and traditional energy retailers and distributors.

1. New definitions to provide better life support protections to customers

We support the introduction of new and amended definitions to provide greater clarity. The proposed distinction between "Critical Life Support Equipment" and "Assistive Life Support Equipment" is a positive step that will allow for better prioritisation of support, especially during emergencies.

To ensure clarity, we recommend that the final guidelines provide a clear definition or criteria for what constitutes a "permanent critical condition". This will assist medical practitioners in making consistent assessments and provide certainty for both customers and exempt sellers.

2. Improving registration and deregistration processes

We agree with the principle of maintaining an accurate life support register. While we support the objective of improving register accuracy, some of the proposed requirements for medical confirmation, follow-ups, and potential deregistration processes could be overly burdensome for exempt sellers. Many exempt sellers are often small operations, such as body corporates or caravan park managers, and do not have the sophisticated IT systems and dedicated compliance teams that licensed retailers possess.

To ensure accuracy without creating excessive administrative load, consideration should be given to simplified processes or centralised support mechanisms that small operators can rely on. We recommend a “Centralised Life Support Register” that all parties can access and maintain, and a universal Medical Confirmation Form for exempt sellers that is accepted by all retailers and distributors. The combination of a centralised register and a universal form would create a system for consistent recognition for life support customers. This would not only benefit customers who move between retailers and exempt sellers but would also address the operational challenges faced by exempt sellers when changing the retailer for a parent meter.

3. Improving Communication Methods

We support the changes to improve communication with life support customers. Allowing a nominated secondary contact person is a sensible and practical measure.

We note the consultation question regarding customers affected by family violence and the potential risks of nominating a secondary contact person. As smaller entities, exempt sellers may not have the specialised training or resources to manage these highly sensitive situations. We recommend that any final rules are supported with clear, practical guidance and training materials. In particular, support for managing privacy, consent, and safety risks in family violence contexts will help ensure exempt sellers can implement these changes safely and effectively.

4. Implementation considerations

Unlike licensed retailers and distributors, many exempt sellers are small businesses or owners’ corporations operating on a limited scale. Some may lack the sophisticated IT systems or dedicated compliance teams that licensed retailers possess. Imposing identical requirements on both large retailers and small exempt sellers creates a disproportionate operational risk without necessarily improving outcomes for customers. We recommend that any new requirements are supported with tools and resources tailored to smaller operators. This could include standardised templates, registers, and communication materials, along with clear guidance and training to support compliance.

5. 24/7 Emergency Contact Requirements and Welfare Checks

While we understand the entitlements life support customers are entitled to, a key consideration is that life support customers must have access to a 24/7 emergency contact number. While this is reasonable for licensed distributors and retailers, it is not always practical for small exempt sellers.

Many exempt sellers operate without dedicated call centres or after-hours staff. Requiring a 24/7 line could impose significant operational challenges.

We recommend the ESC to consider flexible compliance pathways, for example, allowing exempt sellers to nominate the relevant distributor’s 24/7 contact line for emergencies. This also ensures that Emergency Services can effectively coordinate welfare checks.

Conclusion

As an Embedded Network /Local Energy Network Operator, we support the ESC's objective of improving protections for life support customers across the industry. However, we request that the ESC recognise the operational limitations faced by exempt sellers and embedded network operators. A one-size-fits-all approach risks creating challenges for small businesses without improving the outcome for customers.

We thank you for the opportunity to participate in this submission.

Regards,

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